FINAL DETERMINATION

PERMITTEE

City of Tallahassee
2602 Jackson Bluff Road
Tallahassee, Florida 32304

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Final Permit No. 1290001-011-AV
Sam O. Purdom Generating Station

The purpose of this project is to renew the Title V air operation permit for the above referenced facility.

The Title V air operation permit was processed using a parallel review.

PUBLIC NOTICE

A Written Notice of Intent to Issue Air Permit to the City of Tallahassee for the Sam O. Purdom Generating Station located in Wakulla County at 667 Port Leon Drive in St. Marks, Florida, was clerked on November 9, 2012. The Public Notice of Intent to Issue Air Permit was published in the Tallahassee Democrat on November 10, 2012. The draft/proposed Title V air operation permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice of Intent to Issue Air Permit was received on November 21, 2012.

COMMENTS

On November 9, 2012, the Department informed U.S. EPA Region 4 that the Title V air operation permit was being processed using a parallel review. U.S. EPA Region 4 was notified of the publication date of the Public Notice on November 15, 2012.

No comments on the permit were received from the public, U.S. EPA or from the applicant during the 30-day public comment period. However, Department initiated changes were made. All changes are emphasized with yellow highlight in this document only. Additions to the permit are indicated below by double underline. Deletions from the permit are indicated below by ~~strike through~~.

Department Initiated Corrections

The Department made corrections in the final permit.

1. Specific Condition III.D.34. The BACT determination for PSD-FL-239 references reporting as under 40 CFR 60, Subpart A. Subsequent to the BACT determination for PSD-FL-239, the reporting requirement in 40 CFR 60, Subpart A was changed to semi-annual.

Specific Condition III.D.34. is corrected to read as follows:

"**D.34.** ~~Quarterly~~Semi-Annual NOx Monitoring Report. Within 30 days following each calendar ~~quarter~~6-month period, the permittee shall submit a report to the Compliance Authority that summarizes the following information for the ~~quarter~~6-month period.

a. Identify the hours of NOx emission data excluded from the compliance determination due to each of the following: startups, shutdowns, documented malfunctions, major tuning sessions, and fuel switches.
b. For each malfunction, identify the: date; approximate time range; duration (hours) of the malfunction; NOx emission levels during the malfunction; problem and cause of the problem (if known); and corrective action taken (if any).
c. Identify the hours of NOx monitoring system down time due to each of the following: monitor malfunctions; non-monitor malfunctions; quality assurance calibrations; other known causes; and unknown causes. Identify the monitor availability.
d. Monitor availability shall not be less than 95% in any calendar ~~quarter~~6-month period. In the event that 95% availability is not achieved, the permittee shall include a report identifying the problems in achieving 95% availability and a plan of corrective actions that will be taken to achieve 95% availability. The permittee shall implement the reported corrective actions within the next calendar ~~quarter~~6-month period. Failure to take corrective actions or continued failure to achieve the minimum monitor availability shall be violations of this permit.

[40 CFR 60.7; and, PSD-FL-239A/1290001-005-AC, Specific Condition III.C.4.]"

2. Appendix 40 CFR 63, Subpart YYYY. The issued draft/proposed permit contained incorrectly cited facility and emissions unit descriptions in the applicability paragraphs in this appendix.

The applicability paragraphs in Appendix 40 CFR 63, Subpart YYYY are corrected to read as follows:

"…

40 CFR 63, Subpart YYYY - National Emissions Standards for Hazardous Air Pollutants for Stationary Combustion Turbines

Applicability of NESHAP Subpart YYYY

The ~~West County Energy Center~~Sam O. Purdom Generating Station is a major source of hazardous air pollutant emissions.

As such, the new combustion turbine~~s~~, ~~Unit 1 and Unit 2~~Unit No. 8, and the existing combustion turbines, Unit Nos. 1 & 2, are subject to NESHAP 40 CFR 63, Subpart YYYY, which became final on March 5, 2004.

According to the final rule, ~~each unit~~Unit No. 8 is considered a "new lean premix gas-fired stationary combustion turbine." Therefore, ~~each~~this new combustion turbine is subject to an emissions standard for formaldehyde of no more than 91 parts per billion by volume, dry (ppbvd @ 15% O_2). Compliance must be demonstrated by initial and annual performance tests. In addition, acceptable operating parameters must be specified that show continuous compliance with the standard. These operating parameters must be continuously monitored that ensure continuous compliance.

Staying of the Rule

On August 18, 2004, the U.S. EPA stayed the effectiveness of 40 CFR 63, Subpart YYYY for lean premix gas turbines such as Unit ~~1 and Unit 2~~No. 8 at the ~~West County Energy Center~~Sam O. Purdom Generating Station.

The following is the federal regulation amendment that stays the effectiveness of 40 CFR 63, Subpart YYYY:

…"

CONCLUSION

The final action of the Department is to issue the final Title V air operation permit renewal with the administrative corrections and/or clarifications as noted above.