



Transmitted Via Email:
Barbara.Friday@dep.state.fl.us

October 7, 2009

Jonathan Holtom, P.E. Administrator
Title V Section
Division of Air Resources Management
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5500
Tallahassee, Florida 32399-2400

Re: Title V Air Operation Permit Revision
Comments on Draft/Proposed Permit
Arvah B. Hopkins Generating Station (Facility ID 0730003)

Dear Mr. Holtom:

The City of Tallahassee submits the attached comment to the Florida Department of Environmental Protection regarding Draft/Proposed Title V Air Operation Permit No. 0730003-013-AV for the Arvah B. Hopkins Generating Station. Title V Air Operation Permit No. 0730003-013-AV incorporated emission unit, HP2A (EU-033) and the permit specific conditions of air construction permit no. 0730003-009-AC. The following comment is submitted within thirty days from the date of publication of the Public Notice of Intent to Issue Title V Air Operation Permit Revision (Public Notice) pursuant to Rule 62-213.430, Florida Administrative Code (F.A.C.), and as required by the Public Notice.

The requested revision will not result in a significant change in the terms or conditions of the Draft/Proposed permit and the City of Tallahassee believes that the change will not require the issuance and re-noticing of a revised Draft/Proposed permit pursuant to Rule 62-213.430, F.A.C., and the Public Notice.

The City of Tallahassee requests the removal of specific condition E.34. The specific condition states:
E.34. Initial Report on Startups. The permittee shall submit a report summarizing the following information for each startup during the first 12 months of operation: the type of startup; the sequence of events for the startup; the duration of the startup; CO and NOX hourly emissions averages recorded for each hour of the startup (lb/hour and ppmvd @ 15% oxygen); total CO and NOX mass emissions rates for each startup (pounds). The report is due within 60 days following the 12th month of operation for the unit. Based on the actual information, the Department may reduce the duration of data allowed to be excluded as excess emissions due to the startup event through an air construction permit modification. [Rules 62-4.070(3), 62-210.700(5), F.A.C.; and 0730003-009-AC, Specific Condition 37.]

Typically, the Department removes or modifies specific conditions from the air construction permit that have been met prior to the issuance of the draft Title V air operation permit. Case in point, specific condition 20 of air construction permit no. 0730003-009-AC states:

20. CEMS: The permittee shall install, calibrate, maintain, and operate continuous emissions....

This condition has been modified in the Title V to:

E.19. CEMS: The permittee shall calibrate, maintain, and operate continuous emissions....

As the requirement to install a CEMS has been met, the reference has been modified.

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The Initial Report on Startups was submitted to the Department on August 13, 2009, thus meeting the requirement for the report. The City believes that removal of this condition would eliminate confusion in the future, particularly during annual compliance inspections by DEP. A copy of the report will remain on site in accordance with record keeping retention requirements, but no further reports will be forthcoming and the City would prefer to not present this same unchanging document every year during subsequent annual inspections.

If you have any questions regarding the comment, please do not hesitate to contact me at (850) 891-8710, or John Powell, Environmental Regulatory Compliance Administrator at (850) 891-8851 or Rob McGarrah, Manager of Power Production at (850) 891-5534.

Sincerely,

A handwritten signature in cursive script that reads 'Russell A. Wider'.

Russell Wider, P.E.
Environmental Engineer

cc: Cynthia Barber, COT
Rob McGarrah, COT
Triveni Singh, COT
Phil Bucci, COT
John Powell, COT