



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 6, 2009

Electronically Sent – Received Receipt Requested.

Mr. Robert E. McGarrah, Manager of Power Production (Rob.McGarrah@talgov.com)
City of Tallahassee
2602 Jackson Bluff Road
Tallahassee, Florida 32304

Re: DEP File No. 0730003-013-AV
Title V Air Operation Permit Revision
Request for Additional Information

Dear Mr. McGarrah:

The Florida Department of Environmental Protection has reviewed the materials submitted in response to our recent request for additional information letter in reference to your application for a Title V Air Operation Permit Revision for the Arvah B. Hopkins Generating Station. However, we must deem your application *incomplete*, because we need further information relative to the following item:

The Title V air operation permit revision application contained the following Compliance Plan:

Activity	Due Date
Liquid fuel oil initial installation and cleaning.	31-Dec-08
Schedule outage for Unit 2A starts.	09-Feb-09
Schedule outage for Unit 2A ends.	18-Mar-09
Liquid fuel oil commissioning.	25-Mar-09
Notification of compliance test to FDEP.	15 days prior to performance test.
Performance testing completed.	No later than 5-31-09.
Compliance test report to FDEP.	45 days after performance test is completed.

If any activities in this plan have not been completed, please update this plan with new appropriate due dates. When we receive this information, we will continue processing your application. If you have any questions, please contact Project Engineer Tom Cascio at 850-921-9526. Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days.

Sincerely,

Jonathan K. Holtom, P.E., CPM
Program Administrator
Title V Section

Mr. Robert E. McGarrah, Manager of Power Production
Arvah B. Hopkins Generating Station
Page 2 of 2

Cc: Mr. Russell Wider, P.E., City of Tallahassee: Russel.Wider@talgov.com
Mr. Rick Bradburn, Northwest District Office: rick.bradburn@dep.state.fl.us
Ms. Katy Forney, EPA Region 4: forney.kathleen@epa.gov
Ms. Ana Oquendo, US EPA Region 4: oquendo.ana@epa.gov
Ms. Barbara Friday, DEP BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)
Ms. Victoria Gibson, DEP BAR: victoria.gibson@dep.state.fl.us (for reading file)

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Monday, July 06, 2009 4:12 PM
To: 'rob.mcgarrah@talgov.com'
Cc: 'russe.wider@talgov.com'; Bradburn, Rick; 'forney.kathleen@epa.gov'; 'oquendo.ana@epa.gov'; Friday, Barbara; Gibson, Victoria; Walker, Elizabeth (AIR); Cascio, Tom; Holtom, Jonathan
Subject: Request for Additional Information - City of Tallahassee (0730003-013-AV)
Attachments: RAI 0730003-013-AV.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Mcgarrah, Rob [Rob.Mcgarrah@talgov.com]
Sent: Tuesday, July 07, 2009 2:36 PM
To: Livingston, Sylvia
Subject: RE: Request for Additional Information - City of Tallahassee (0730003-013-AV)

This has been received by the City of Tallahassee.

-----Original Message-----

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Monday, July 06, 2009 4:12 PM
To: Mcgarrah, Rob
Cc: russel.wider@talgov.com; Bradburn, Rick; forney.kathleen@epa.gov; oquendo.ana@epa.gov; Friday, Barbara; Gibson, Victoria; Walker, Elizabeth (AIR); Cascio, Tom; Holtom, Jonathan
Subject: Request for Additional Information - City of Tallahassee (0730003-013-AV)

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.



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

July 14, 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 Application
Request for Additional Information
Arvah B. Hopkins Generating Station (Facility ID 0730003)

Dear Mr. Holtom:

This letter is in response to your request dated July 6, 2009 for additional information concerning the Title V Air Operation Permit Revision Application for the City of Tallahassee's Arvah B. Hopkins Generating Station. In particular, the Department requested an update of the Compliance Plan that was an attachment to the permit revision application. The City completed liquid fuel oil commissioning in late March 2009, and completed the performance testing as required on June 8, 2009. The test report will contain the results of the testing for ammonia slip, visible emissions, as well as the continuous emissions monitoring systems (CEMS) data for NOx and CO that was recorded during the test. This report shall be submitted to the Department sometime next week.

The updated compliance plan details the schedule of the last initial performance testing activity to be performed. Unit HP2A will simulate simple cycle bypass operation mode while the unit is firing natural gas without duct burners and without ammonia injection. The test will consist of four one-hour runs during which the CEMS for NOx and CO will record the required data. The City of Tallahassee has made the required notification and the test should be completed by the end of July with the appropriate reports to be submitted as soon as practicable.

The requested document has been attached and is accompanied by the signature of the Primary Responsible Official, Rob McGarrah. As this request is not of an engineering nature, certification by a professional engineer is unnecessary and a signature and seal from one has not been included. If this is in error please contact me at your earliest convenience.

If you have any questions regarding the attachments, 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,

Russell Wider, P.E.
Environmental Engineer

Attachments

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

CITY HALL
300 South Adams Street
Tallahassee, FL 32301-1731
850-891-0000
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JOHN J. MARKS, III
Mayor

ANITA E. THOMPSON
City Manager

ALLAN J. KATZ
Mayor Pro Tem

JAMES R. ENGLISH
City Attorney

ANDREW GILLUM
Commissioner

GARY HERNDON
City Treasurer-Clerk

DEBBIE LIGHTSEY
Commissioner

SAM M. McCALL
City Auditor

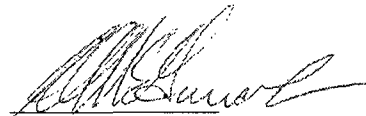
MARK MUSTIAN
Commissioner

Compliance Plan

Activity	Due Date
Liquid Fuel Oil initial installation and cleaning	31-Dec-08
Schedule outage for Unit 2A Starts	09-Feb-09
Scheduled outage for Unit 2A Ends	18-Mar-09
Liquid Fuel Oil Commissioning	25-Mar-09
Notification of Compliance Test to FDEP	15 days prior to Performance test
Ammonia Slip testing while firing LFO Completed	08-June-09
Compliance Test Report to FDEP	23-July-09
Simple Cycle HRSG/SCR bypass operation compliance testing scheduled	03-July-09
Notification of Compliance test to FDEP	15 days prior to test
Simple Cycle HRSG/SCR bypass operation compliance test performed	22-July-09
Compliance Test Report to FDEP	45 days after bypass operation test is completed.

Responsible Official Certification

I, the undersigned, am the Responsible Official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this document is being submitted. I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements and information in this document are true, accurate, and complete.

A handwritten signature in black ink, appearing to read 'R. McGarrah', written over a horizontal line.

Robert E. McGarrah
Responsible Official