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DIVISION OF AIR RESOURCE MANAGEMENT



Transmitted Via Certified Mail: 7011 0470 0001 0594 2526
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August 23, 2012

Martin Costello, P. E. 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 Renewal Application

Request for Additional Information

Arvah B. Hopkins Generating Station (Facility ID 0730003)

Dear Mr. Costello:

This letter is in response to your request dated June 20, 2012 for additional information concerning the Title V Air Operation Permit Renewal Application for the City of Tallahassee's Arvah B. Hopkins Generating Station. In particular, the Department requested two items of information. These items and the City's responses are listed below:

1. In letter dated May 16, 2012, regarding changes to the Title V permit for the Hopkins facility, you requested changes to Specific Condition E.25 to reduce the frequency of compliance testing from annual to only during years when the simple cycle mode has been used. The Title V renewal process cannot be used to change requirements in construction permits. Since the annual test requirement was established in Condition 22 of permit No. 0730003-009-AC for EU-033, please submit an application for an AC permit revision if you wish to accommodate this change at this time.

Response: At this time, the City of Tallahassee would like to withdraw this request and perhaps pursue this at a later date.

2. From the information provided with the annual operations reports (AOR), it is conceivable that oil has been fired in Unit 1 for more than 400 hours/yr during the period covered by the existing Title V permit. However, it does not appear that particulate matter (PM) compliance tests have been performed while firing oil. For any year during the past 5 years that oil was fired (including used oil) for more than 400 hrs, please provide the test results for the required compliance tests. If no tests were conducted in this case, please revise the compliance statement appropriately and provide a compliance plan committing to a schedule for completing the required compliance tests for PM.

Response: Listed below are the operating hours of Unit 1 on oil and gas for the past 5 years, as reported to US EPA via the Clean Air Markets Division (Part 75 reporting). In no year was oil fired for more than 400 hours.

Year		Hours of operation on gas	Hours of operation on oil	Total hours of operation
	2007	7490	0	7490
	2008	4525.38	86	4611
	2009	3637.21	3.05	3640.26
	2010	5241	237	5478
	2011	4389	52	4441
2012 (until 6/30/12)	2086	0	2086

CITY HALL 300 South Adams Street Tallahassee, FL 32301-1731 850-891-0000 TDD: 711 • Talgov.com JOHN R. MARKS, III Mayor ANITA F. THOMPSON

City Manager

ANDREW GILLUM Commissioner JAMES R. ENGLISH

City Attorney

NANCY MILLER Commissioner

JAMES O. COOKE, IV

City Treasurer-Clerk

MARK MUSTIAN
Commissioner
SAM M. McCALL

City Auditor

GIL D. ZIFFER Commissioner Additionally, the City of Tallahassee submits the test results of the compliance testing required by the compliance plan that was submitted with the Title V renewal application dated May 20, 2012. A summary of the results of compliance testing that is required prior to the permit renewal for units that generally are not required to test annually is listed in the table below. These tests were all conducted while the units were using natural gas as fuel and each visible emissions test was one-hour long.

Unit	Test date	Visible Emissions Limit	VE test result	Heat input (mmBtu/hr)
Unit 1 (EU-001)	May 11, 2012	20%	0%	795
GT1 (EU-002)	July 25, 2012	20%	0%	225.8
GT2 (EU-003)	July 26, 2012	20%	0%	408.6

If you have any questions regarding the information above, please do not hesitate to contact me at (850) 891-8710, or John Powell, Environmental Regulatory Compliance Administrator at (850) 891-8851 or Triveni Singh, Manager of Power Production at (850) 891-5533.

Sincerely,

Russell A. Wider, P.E. Environmental Engineer

Kussell a. Vill

Attachment

cc:

Cynthia Barber, COT Clark Sheehan, COT Triveni Singh, COT Phil Bucci, COT John Powell, COT

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

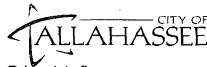
1.	Application Responsible Official Name:
	Triveni Singh, Manager Power Production
2.	Application Responsible Official Qualification (Check one or more of the following options, as applicable):
	For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
	For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
	For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
	The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3.	Application Responsible Official Mailing Address Organization/Firm: City of Tallahassee
	Street Address: 2602 Jackson Bluff Road
	City: Tallahassee State: FL Zip Code: 32304
4.	Application Responsible Official Telephone Numbers Telephone: (850) 891 - 5533 ext. Fax: (850) 891 - 5162
5.	Application Responsible Official E-mail Address: Triveni.Singh@talgov.com
6.	Application Responsible Official Certification:
I, th	ne undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

DEP Form No. 62-210.900(1) – Form

Effective: 3/16/08 5

Fr	ofessional Engineer Certification
1.	Professional Engineer Name: Russell A. Wider, Environmental Engineer
	Registration Number: 66540
2.	Professional Engineer Mailing Address
	Organization/Firm: City of Tallahassee
	Street Address: 300 South Adams Street
	City: Tallahassee State: Florida Zip Code: 32304
3.	Professional Engineer Telephone Numbers
	Telephone: (850) 891-8710 ext. Fax: (850) 891-8277
4.	Professional Engineer E-mail Address:
5.	Professional Engineer Statement:
	I, the undersigned, hereby certify, except as particularly noted herein*, that:
	(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and
	(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.
	(3) If the purpose of this application is to obtain a Title V air operation permit (check here, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.
	(4) If the purpose of this application is to obtain an air construction permit (check here, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.
	(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.
}	Signature Date
	(seal)
* /	Attach any exception to certification statement.

DEP Form No. 62-210.900(1) – Form Effective: 03/11/2010



Transmittal via email: NWDAir@dep.state.fl.us

May 17, 2012

Florida Department of Environmental Protection Northwest District Office 160 Governmental Center Pensacola, Florida 32502-5794

Re:

Visible Emissions Test Boiler Unit 1 (EU-001) City of Tallahassee

Arvah Hopkins Generating Station (Facility ID: 0730003)

Dear Mr. Bradburn:

Pursuant to the City of Tallahassee's letter dated April 27th, the City submits the attached visible emissions test for the Arvah Hopkins Generating Station. The visible emissions test was conducted on May 11, 2012, in order to demonstrate compliance with the permitted limit of 20%, six-minute average for opacity. The test was conducted while the unit was firing natural gas as fuel. Two tests were conducted on the test date of May 11th, with the latter test being conducted at a capacity higher than 90% of the maximum heat input. Both test results have been included in this test report submission and demonstrate a visible emissions determination of 0% opacity, based on a 6-minute average.

Please do not hesitate to contact me at (850) 891-8710, or John Powell, Environmental Regulatory Compliance Administrator at (850) 891-8851, if you have any questions or require additional information.

Sincerely.

Russell Wider, P.E.

Russell a. W.

Attachment

CC:

Cynthia Barber, COT Clark Sheehan, COT John Powell, COT Phil Bucci, COT

VISIBLE EMISSION OBSERVATION FORM 1	Foom Nun	1	HIP	OC	1	Ango Or Z
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TALLAHASSEE FLORING 32304	20000	
BOILER-GAS FIRED 1 00000000000000000000000000000000000	10000	
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Whitlow Enterprises, LLC

www.smokeschool.net

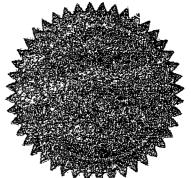
Certifies that

Hazem Tamimi of City of Tallahassee

Has passed the certification test required by EPA Method 9 40 CFR 60 Appendix A and is qualified as a visible emissions evaluator.

Certification Date: 2/22/2012 Location: Gainesville, FL

George Whitlow **President**



GFL022212-16



Submitted via email: NWDair@dep.state.fl.us

August 15, 2012

Rick Bradburn Northwest District Office Florida Department of Environmental Protection 160 Governmental Center Pensacola, Florida 32502-5794

Re:

2012 Annual Compliance Tests

Units CT1 & CT2 (EUs - 002 & 003)

Visible Emissions Test

Arvah B. Hopkins Generating Station - Facility ID No. 0730003

Dear Mr. Bradburn:

Pursuant to Title V Air Operation Permit No. 0730003-013-AV, the City of Tallahassee (City) submits the attached annual air compliance test report for visible emissions (VE) for Combustion Turbines CT1 and CT2 (EUs -002 & -003) at the Arvah B. Hopkins Generating Station. The tests were performed during the week of July 25, 2012 while the units were firing natural gas.

The test results indicate that the six-minute average for opacity as follows:

Enterior Unit	Permit Limit VI. (%).	distribute systematic	Heathean (andsults
HET HET WES	20	0	225.8
C SO (FRANCE)	20	0	408.6

Attached are the field data sheets from the visible emissions testing that were conducted in accordance with Reference Method 9. These tests have been done to demonstrate compliance with the applicable emissions limiting standard prior to obtaining a renewed operation permit.

Please do not hesitate to contact me at (850) 891-8710, if you have any questions or require additional information.

Sincerely.

Russell Wider, P.E. **Environmental Engineer**

Attachments

cc:

Cynthia Barber, COT Triveni Singh, COT Phil Bucci, COT John Powell, COT

Clark Sheehan, COT

Мауог

CITY HALL 300 South Adams Street Tallahassee, FL 32301-1731

850-891-0000 TDD: 711 • Talgov.com City Manager

ANITA E THOMPSON

JOHN R. MARKS, III

ANDREW GILLUM Commissioner

JAMES R. ENGLISH

City Attorney

NANCY MILLER Commissioner

City Treasurer-Clerk

GARY HERNDON SAM M. McCALL

MARK MUSTIAN Commissioner

City Auditor

GIL D. ZIFFER Commissioner

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.

Triveni Singh

Responsible Official



VISIBLE EMISSIONS EVALUATOR

Russell Wider

This is to certify that the above named observer has met the specifications of Federal Reference Method 9 and is qualified as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates, Inc. of Raleight N.C.

This certificate is valid for six months from date of issue

404704

Certificate Number

5/16/2012

Date of Certification

11/15/2012

Certification Expiration Date

WID360837

Student ID Number

Pensacola, FL

Location

TMPF11

Last Lecture

Marty Hughes
Director of Training

EPA VISIBLE EMISSION OBSERVATION FORM 1

Method (head Chole On Method 9	e) 203A 2038	Other:	
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Organization City of	Tollahouse
Carllind By ETA	Date 5/16/12

EPA VISIBLE EMISSION OBSERVATION FORM 1

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City of Tallahussee Rivan Hopkins Generating Station										
1125 Geddie Re										
Tallahassee	FL 32304									
Combustion Turbia	Unit # Operating Mode HC1									
M.9 vs.	Operating Mode 1/A									
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City of Tellaha	See
Certified by	Dode 5/16/12

EPA VISIBLE EMISSION OBSERVATION FORM 1

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Tallahassee	Stobe ~		32304
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EPA VISIBLE EMISSION OBSERVATION FORM 1 H C 2 0 2 2°2 Form Number Continued on VEO Form Num Method Usad (Circle One) Other: 2:43 0 Observation Date 7/26/12 Pre Zone EDST LYSPM Station Comments O Ó Specialing Mode 4086 pun8tu Specialing Mode Combustion Turbitticz Control Equipment Describe Ernission Point Ð ø Height of Gritte. Pt. Height of Ernise. Pt. Rel. to Observer اعطأ Distance to Emiss Pt. Start **Gnd** Vertical Angle to Obs. Pt. Otraction to Obs. Pt. (Degraes) Start End Black
Distance and Discriton to Observation Point from End Ø Describe Emissions D Encil Woder Droplet Plume Affached Detached None D D D Describe Plume Background Start Background Color incl Sky Conditions D Ø Mind Speed Engl D End RH Percent End Stort Ambient Temp. Stort Met Bullo Tismp. O Start Brd O Source Layout Shetch Drow North Arrow ø □ IN □ WeN O X Observation Point Ð \Box O Observer's Position O D Sun. Sun Location Line Observante Names (Paris) Russell ebuttgnoi واصدائها Dectination Wider ٠.٠ Charle a. W.S. 7/26/12 Additional Information Tallahas sec City of

ETA