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May 9, 2001

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BUREAU OF AIR REGULATION

Mr. Al Linero, PE Administrator
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Mail Station 5505

**Re: Proposed Burner Replacement Project
Unit 2 Steam Generating Unit (Unit ID -004)
Site Certification No. PA-74-03D
Operating Permit No. 0730003-001-AV
Arvah B. Hopkins Generating Station**

Dear Mr. Linero:

The City of Tallahassee has received the Department's response to the requested review (dated April 13, 2001) of a proposed burner replacement project. The City would like to extend its sincerest appreciation for the Department's expeditious consideration of the proposed project. The City recognizes and respects the Department's request and rationale for the additional information pointed out in the letter dated April 24, 2001. However, inasmuch as the Department indicated that additional information would be necessary to identify whether the proposed project qualifies for an exemption as a pollution control project, the City would like to emphasize that the April 13, 2001, request also asked that the Department consider qualification of the project as "routine replacement" of burners.

A phone conversation on April 19, 2001, between Mr. Mike Halpin and Karl Bauer indicated that neither the Department nor EPA believed that the proposed project would qualify as "routine replacement," based on the information available at that time. As your letter does not address the routine nature of the proposed project, the City would like to further explain why the project should qualify as "routine replacement." In reviewing the WEPCO rulemaking published in the Federal Register in July 1992, the City understands that the EPA defines routine nature of a project "based on the evaluation of

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whether that type of equipment has been repaired or replaced by sources within the relevant industry." The City is confident in stating that burner replacement projects similar to the one proposed occur commonly on steam-generating sources within the electric industry. Furthermore, although the components that have been chosen to replace the existing burners are designed to reduce NOx emissions, they will serve a functionally similar purpose as the existing burners and will not fundamentally change the production process. For these reasons, the City maintains its previously stated position that the proposed project would qualify both as a "routine repair, replacement and maintenance" activity, as well as a "pollution control project."

Regardless as to how the project would have qualified (routine repair, replacement and maintenance or pollution control), the City recognizes that the Department will need the additional information requested in the April 24, 2001, letter. The City deemed it to be impracticable to gather the required information, get approval from the Department (as well as possible approval from the EPA and the National Park Service), and execute a contract for the purchase and installation of the burners to meet the proposed fall outage schedule. As such, the City has decided to suspend consideration of the burner replacement project, at this time.

Again, the City truly appreciates the expedient and thorough efforts afforded by you and your staff. Once we have identified a schedule to continue pursuing the burner replacement project, we will attempt to provide the information requested in your April 24, 2001, letter.

In the meantime, if you have any questions regarding the proposed project or the applicability determination requested, please feel free to contact me at (850) 891-5534 or Ms. Jennette Curtis at (850) 891-8850.

Yours truly,



Robert E. McGarrah, Superintendent
Electric Production Division

lmh

cc: Clair Fancy, FDEP
Mike Halpin, FDEP
T. Singh, COT
J. Curtis, COT