



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

P.E. Certification Statement

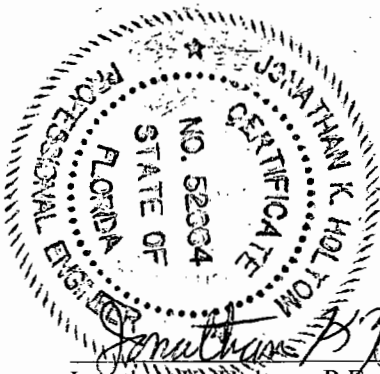
Permittee:

City of Tallahassee
Arvah B. Hopkins Generating Station

DRAFT Permit No.: 0730003-006-AC
Facility ID No.: 0730003

Project: Air Construction Permit Revision to establish allowable excess visible emissions during minor load changes.

I **HEREBY CERTIFY** that the engineering features described in the above referenced application and related additional information submittals, if any, and subject to the proposed permit conditions outlined in the "Statement of Basis" attached to this permit, provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).



Jonathan K. Holtom, P.E.

Registration Number: 0052664

10/26/04
Date

Permitting Authority:

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114

Fax: 850/922-6979

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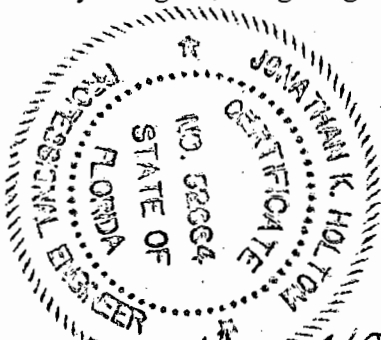
Permittee:

City of Tallahassee
Arvah B. Hopkins Generating Station

DRAFT Permit No.: 0730003-007-AV
Facility ID No.: 0730003

Project: Title V Air Operation Permit Revision to incorporate project 0730003-006-AC.

I HEREBY CERTIFY that the engineering features described in the above referenced application and related additional information submittals, if any, and subject to the proposed permit conditions outlined in the "Statement of Basis" attached to this permit, provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).



Jonathan K. Holtom
Jonathan K. Holtom, P.E.
Registration Number: 0052664

10/26/07
Date

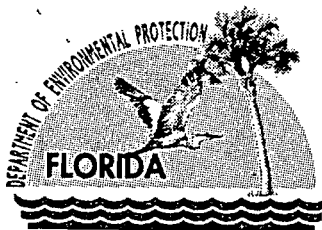
Permitting Authority:

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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Twin Towers Office Building
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Colleen M. Castille
Secretary

October 29, 2004

Mr. Robert McGarrah
Manager of Power Production
City of Tallahassee
2602 Jackson Bluff Road
Tallahassee, Florida 32304

Re: Air Construction Permit, DRAFT Permit No.: 0730003-006-AC
Title V Air Operation Permit Revision, DRAFT Permit No.: 0730003-007-AV
Arvah B. Hopkins Generating Station

Dear Mr. McGarrah:

One copy of the combined Public Notice, the Draft Air Construction Permit, and the revised portions of the DRAFT Title V Air Operation Permit for the Arvah B. Hopkins Generating Station located at 1125 Geddie Road, Tallahassee, Leon County, is enclosed. The permitting authority's "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" are also included. Please note that only those portions of the Title V permit that were affected by the revision are being included in this transmittal. Once the revision becomes final, these updated pages will replace the corresponding pages in your existing Title V Air Operation Permit. A full copy of the text of the revised permit (not including the referenced attachments) has been sent by electronic mail.

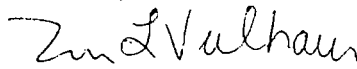
An electronic version of the DRAFT Permits have been posted on the Division of Air Resource Management's World Wide Web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

["http://www.dep.state.fl.us/air/eproducts/ards/default.asp"](http://www.dep.state.fl.us/air/eproducts/ards/default.asp).

The "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" must be published as soon as possible upon receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit revision.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to James K. Pennington, P.E., at the above letterhead address. If you have any other questions, please contact Jonathan Holtom, P.E., at 850/921-9531.

Sincerely,


Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/jkp/jh
Enclosures

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In the Matter of an
Application for Permits by:

City of Tallahassee
2602 Jackson Bluff Road
Tallahassee, Florida 32304

Draft Air Construction Permit No.: 0730003-006-AC
DRAFT Title V Air Operation Permit No.: 0730003-007-AV
Arvah B. Hopkins Generating Station
Leon County

INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an Air Construction permit and a Title V Air Operation Permit Revision (copies of the Draft Air Construction Permit and the revised portions of the DRAFT Title V Air Operation Permit attached) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, City of Tallahassee, applied on September 10, 2004, to the permitting authority for an Air Construction permit and a Title V Air Operation Permit Revision, for the Arvah B. Hopkins Generating Station located at 1125 Geddie Road, Tallahassee, Leon County.

The Air Construction Permit is being issued at the applicant's request to allow for excess visible emissions resulting from fuel switching, startup or shutdown of an individual burner, or minor load change. The current permit allows emissions in excess of the permitted limit for up to 2 hours in any 24 hour period for occurrences of a unit start up, shut down or malfunction. However, due to the operational nature of this specific dual fuel-fired boiler, fuel switching and minor load changes can sometimes result in visible emissions slightly above the current permitted levels with no significant increase in particulate matter emissions. In accordance with rule 62-210.700(5), Florida Administrative Code (F.A.C.), considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest.

The Title V Air Operation Permit Revision is being issued to allow continued commercial operation of the facility, as revised by Air Construction Permit 0730003-006-AC.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-212 and 62-213. This source is not exempt from construction and Title V permitting procedures. The permitting authority has determined that an Air Construction Permit and a Title V Air Operation Permit are required to construct and to commence or continue operations at the described facility.

The permitting authority intends to issue the Air Construction Permit and the Title V Air Operation Permit based on the belief that reasonable assurances have been provided to indicate that the construction activity and operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit revision. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-1344; Fax: 850/922-6979), within 7 (seven) days of

Note to Permittee: This page is part of the Notice of Intent, NOT the Public Notice.
PLEASE DO NOT PROVIDE THE NOTICE OF INTENT TO THE NEWSPAPER FOR PUBLICATION!

publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit revision pursuant to Rule 62-110.106, F.A.C.

The permitting authority will issue the Air Construction Permit and the PROPOSED Title V Air Operation Permit and subsequent FINAL Title V Air Operation Permit, in accordance with the conditions of the attached Draft Air Construction Permit and the DRAFT Title V Air Operation Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT."

The permitting authority will accept written comments concerning the proposed Title V Air Operation Permit issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT."

Written comments must be post-marked, and all e-mail or facsimile comments must be received by the close of business (5 pm), on or before the end of the comment periods listed above by the Permitting Authority at the above address, e-mail or facsimile. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the Department's official web site for notices at <http://tlhora6.dep.state.fl.us/onw> and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT Permit, the Permitting Authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit revision applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when each petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;

Note to Permittee: This page is part of the Notice of Intent, NOT the Public Notice.
PLEASE DO NOT PROVIDE THE NOTICE OF INTENT TO THE NEWSPAPER FOR PUBLICATION!

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

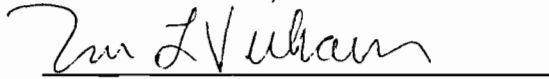
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit revision. Any petition shall be based only on objections to the permit revision that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section

7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at: <http://www.epa.gov/region4/air/permits/Florida.htm>.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT (including the combined PUBLIC NOTICE and the DRAFT Permits) was sent by certified mail before the close of business on 10/29/04 to the person(s) listed:

Mr. Robert McGarrah, City of Tallahassee

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL (including the DRAFT Permit package) were sent by INTERNET E-mail on the same date to the person(s) listed:

Mr. John Powell, P.E. (PowellJ@talgov.com)]

Mr. Andy Allen, DEP-NWD


Ms. Sandra Veazey, DEP-NWD

Mr. Hamilton Oven, P.E., DEP-SCO

U.S. EPA, Region 4

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.


(Clerk) Friday 10/29/04 (Date)

**PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR
OPERATION PERMIT**

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Construction Permit No.: 0730003-006-AC
DRAFT Title V Air Operation Permit No.: 0730003-007-AV

City of Tallahassee – Arvah B. Hopkins Generating Station
Leon County

Applicant: The applicant for this project is City of Tallahassee, 2602 Jackson Bluff Road, Tallahassee, Florida 32304. The applicant's responsible official is Mr. Robert McGarrah, Manager of Power Production.

Facility Location: The applicant operates a steam power generation facility, which is located at 1125 Geddie Road, Tallahassee, Leon County, Florida.

Project: The applicant submitted an application for an Air Construction Permit in order to establish an allowable limit for excess visible emissions resulting from fuel switching, startup or shutdown of an individual burner, or minor load change. The current permit allows emissions in excess of the permitted limit for up to 2 hours in any 24 hour period for occurrences of a unit start up, shut down or malfunction. However, due to the operational nature of this specific dual fuel-fired boiler, fuel switching and minor load changes can sometimes result in visible emissions slightly above the current permitted levels with no significant increase in particulate matter emissions. In accordance with rule 62-210.700(5), Florida Administrative Code (F.A.C.), considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest.

The applicant also submitted an application for a Title V Air Operation Permit revision. This facility consists of two fossil fuel-fired steam generators and two fossil fuel-fired combustion turbines. The two steam generators are Phase II Acid Rain Units. Boiler Number 2 is regulated under the Florida Electrical Power Plant Siting Act. The total (nominal) combined electrical generating capacity from the facility is 356.27 megawatts electric (MW), of which, 313 MW are provided by the steam generators and 43.27 MW are provided by the combustion turbines. The fuels used at this facility are natural gas, fuel oil and on-specification used oil. This permit will be a revision to the Title V air operation permit for this facility.

Permitting Authority: Applications for Air Construction Permits and for Title V Air Operation Permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to operate the facility. The Department of Environmental Protection is the Permitting Authority responsible for making a permit determination regarding this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: Department of Environmental Protection, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the Draft Construction Permit, the Statement of Basis, the Draft Title V permit, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed, above, or may view the DRAFT Permit and file electronic comments by visiting the following website: <http://www.dep.state.fl.us/air/eproducts/ards/>. A copy of the complete project file is also available at the

Department of Environmental Protection's Northwest District Office at 160 Governmental Center, Pensacola, Florida 32501-5794 (Telephone: 850/595-8300).

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an Air Construction Permit and a Title V Air Operation Permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Air Construction Permit, a Proposed Title V Air Operation Permit and subsequent Final Title V Air Operation Permit in accordance with the conditions of the Draft Permits unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the Draft Air Construction Permit for a period of fourteen (14) days from the date of publication of this Public Notice. The Permitting Authority will accept written comments concerning the Draft Title V Air Operation Permit for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be post-marked and all e-mail or facsimile comments must be received by the close of business (5 pm) on or before the end of this 30-day period by the Permitting Authority at the above address, email or facsimile. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the Department's official web site for notices (<http://tlhora6.dep.state.fl.us/onw/>) and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT Permit, the Permitting Authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with

respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of intent. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

Objections: In addition to the above right to petition, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V Air Operation Permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding objections, visit the EPA Region 4 web site at: www.epa.gov/region4/air/permits.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

MR. Robert McGarrah
Manager of Power Production
City of Tallahassee
2602 Jackson Bluff Road
Tallahassee, Florida 32304

4a. Article Number

7001 1140 0002 1578 2120

4b. Service Type

- ☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery

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V. Mosser

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X V. Mosser, 11-1-04

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PS Form 3811, December 1994

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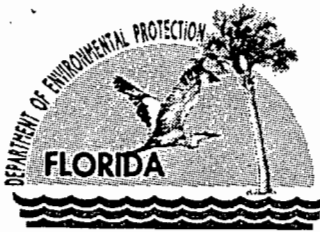
2602 Jackson Bluff Road

City, State, ZIP+4

Tallahassee, Florida 32304

PS Form 3800, January 2001

See Reverse for Instructions



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

PERMITTEE:

City of Tallahassee
Arvah B. Hopkins Generating Station
1125 Geddie Road
Tallahassee, Florida 32304

Authorized Representative:

Robert McGarrah, Manager of Power Production

DRAFT

ARMS Permit No.	0730003-006-AC
Facility ID No.	0730003
SIC No.	4911
Expires:	May 31, 2005

PROJECT AND LOCATION

This permitting action is being issued at the applicant's request to allow for excess visible emissions resulting from fuel switching, startup or shutdown of an individual burner, or minor load change. The current permit allows emissions in excess of the permitted limit for up to 2 hours in any 24 hour period for occurrences of a unit start up, shut down or malfunction. However, due to the operational nature of this specific dual fuel-fired boiler, fuel switching and minor load changes can sometimes result in visible emissions slightly above the current permitted levels with no detectable increase in particulate matter emissions. In accordance with rule 62-210.700(5), Florida Administrative Code (F.A.C.), considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest.

The facility is located at 1125 Geddie Road, Tallahassee, Leon County.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to make changes in accordance with the conditions of this permit.

APPENDICES

The following attached document is incorporated as part of this permit:

Appendix CG General Conditions

MGC/jkp/jh

Enclosure

cc: Sandra Veazey, DEP - NWD
Jennette Curtis, City of Tallahassee
Buck Oven, DEP - PPSO

Michael G. Cooke, Director
Division of Air Resource Management

Andy Allen, DEP - NWD
John Powell, City of Tallahassee

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SECTION II. ADMINISTRATIVE REQUIREMENTS

FACILITY DESCRIPTION

This facility consists of two fossil fuel-fired steam generators and two fossil fuel-fired combustion turbines. The two steam generators are Phase II Acid Rain Units. Boiler Number 2 is regulated under the Florida Electrical Power Plant Siting Act. The total (nominal) combined electrical generating capacity from the facility is 356.27 megawatts electric (MW), of which, 313 MW are provided by the steam generators and 43.27 MW are provided by the combustion turbines. The fuels used at this facility are natural gas, fuel oil and on-specification used oil.

REGULATORY CLASSIFICATION

Title V Major Source. This facility is a Title V major source of air pollution.

PSD Major Source. Each pollutant with potential emissions greater than the Significant Emissions Rates specified in Table 62-212.400-2, F.A.C. requires a PSD review and Best Available Control Technology (BACT) determination. This project will not result in a significant emissions increase of any pollutant, nor will it subject the emissions unit to any new BACT standards, provided that the Emissions Unit is operated as specified in this permit.

RELEVANT DOCUMENTS

The documents listed form the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- 0730003-003-AV effective 01-01-03
- Electronic construction permit application received 9-10-04

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

1. Other Permits. The conditions of this permit supplement all previously issued air construction and/or operation permits for this facility. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations.

[Rule 62-4.070, F.A.C.]

2. In order to establish an allowable period of excess visible emissions resulting from fuel switching, startup or shutdown of an individual burner, or minor load change, the following condition is created:

Excess visible emissions resulting from fuel switching, startup or shutdown of an individual burner, or minor load changes shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of such excess visible emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. A "minor load" change means a change in the operational load of the unit, other than startup or shutdown, which is between 2 percent and 10 percent of the unit's rated capacity and occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700 (5), F.A.C.; and, applicant request]

3. ATTACHMENT GENERAL CONDITIONS is a part of this permit (letter) and incorporated by reference.

ATTACHMENT GENERAL CONDITIONS

Rule 62-4.160, F.A.C.

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
[Rule 62-4.160(1), F.A.C.]
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
[Rule 62-4.160(2), F.A.C.]
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
[Rule 62-4.160(3), F.A.C.]
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
[Rule 62-4.160(4), F.A.C.]
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
[Rule 62-4.160(5), F.A.C.]
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
[Rule 62-4.160(6), F.A.C.]
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

[Rule 62-4.160(7), F.A.C.]

- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- [Rule 62-4.160(8), F.A.C.]
- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- [Rule 62-4.160(9), F.A.C.]
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- [Rule 62-4.160(10), F.A.C.]
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- [Rule 62-4.160(11), F.A.C.]
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- [Rule 62-4.160(12), F.A.C.]
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology ()
 - (b) Determination of Prevention of Significant Deterioration (); and
 - (c) Compliance with New Source Performance Standards ().
- [Rule 62-4.160(13), F.A.C.]
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- [Rule 62-4.160(14), F.A.C.]

- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.
[Rule 62-4.160(15), F.A.C.]

STATEMENT OF BASIS

City of Tallahassee
Arvah B. Hopkins Generating Station
Facility ID No.: 0730003
Leon County

Title V Air Operation Permit Revision
Permit No.: 0730003-007-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 62-213 and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility was issued a Title V Air Operation Permit renewal (Permit No. 0730003-003-AV) on January 1, 2003. The Department issued Air Construction (AC) Permit No. 0730003-006-AC concurrent with this Draft Title V permit revision. The AC permit establishes an allowable limit for excess visible emissions resulting from fuel switching, startup or shutdown of an individual burner, or minor load change. This is the first revision to the renewed Title V Air Operation permit.

This Title V Air Operation Permit revision incorporates the excess emissions conditions from Permit No. 0730003-006-AC into the Title V Air Operation Permit.

This facility consists of two fossil fuel-fired steam generators and two fossil fuel-fired combustion turbines. The two steam generators are Phase II Acid Rain Units. Boiler Number 2 is regulated under the Florida Electrical Power Plant Siting Act. The total (nominal) combined electrical generating capacity from the facility is 356.27 megawatts electric (MW), of which, 313 MW are provided by the steam generators and 43.27 MW are provided by the combustion turbines. The fuels used at this facility are natural gas, fuel oil and on-specification used oil. With the issuance of this permit, the Department is formally recognizing the facility's historical ability to utilize liquefied petroleum gas (LPG) as an igniter fuel for the fuel oil during periods of natural gas curtailment. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Emissions unit number 001 is a Foster-Wheeler Corporation fossil fuel fired steam generator (model number SF-5) designated as "Boiler Number 1". It is rated at a maximum heat input of 903 million Btu per hour (MMBtu/hour) when firing natural gas or fuel oil and a nominal 75 MW and 750,000 pounds of steam per hour.

Emissions unit number 004 is a Babcock & Wilcox steam generator (model number RB-533) designated as "Boiler Number 2". It is rated at a maximum heat input of 2,325 million Btu per hour (MMBtu/hour) when firing fuel oil and 2,500 MMBtu/hour when firing natural gas and a nominal 238 MW and 1,619,000 pounds of steam per hour.

Emissions unit number 002 is a combustion turbine manufactured by Westinghouse (model number W191G) and is designated as "Combustion Turbine Number 1". It is rated at a maximum heat input of 228 million Btu per hour (MMBtu/hour) while being fueled by natural gas and/or No. 2 fuel oil with a maximum fuel oil sulfur content of 0.4%, by weight. Emissions unit number 003 is a combustion turbine manufactured by Westinghouse

(model number W251G) and is designated as "Combustion Turbine Number 2". It is rated at a maximum heat input of 446 million Btu per hour (MMBtu/hour) while being fueled by natural gas and/or No. 2 fuel oil with a maximum fuel oil sulfur content of 0.4%, by weight. Combustion Turbine Number 1 runs a nominal 16.47 MW generator and Combustion Turbine Number 2 runs a nominal 26.8 MW generator. Emissions from the combustion turbines are uncontrolled.

Based on the Title V permit renewal application received July 1, 2002, this facility is a major source of hazardous air pollutants (HAPs).

Proposed changes to the Title V Permit No. 0730003-003-AV for the Arvah B. Hopkins Generating Station are described below.

1. As a result of the provisions of permit No. 0730003-006-AC, a new Specific Condition B.16. is added:

B.16. Excess visible emissions resulting from fuel switching, startup or shutdown of an individual burner, or minor load changes shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of such excess visible emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. A "minor load" change means a change in the operational load of the unit, other than startup or shutdown, which is between 2 percent and 10 percent of the unit's rated capacity and occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700 (5), F.A.C.; and, 0730003-006-AC.]

2. Old Specific Conditions B.16. – B.37. have been renumbered as B.17. – B.38.

Only the portions of the permit that have been changed as a result of this project are being issued with this revision. Upon finalization of this project, the revised pages will be substituted into the existing permit in the appropriate places.

City of Tallahassee
Arvah B. Hopkins Generating Station
Facility ID No.: 0730003
Leon County

Title V Air Operation Permit Revision

DRAFT Permit No.: 0730003-007-AV

(1st Revision of Title V Air Operation Permit No.: 0730003-003-AV)

Permitting Authority

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

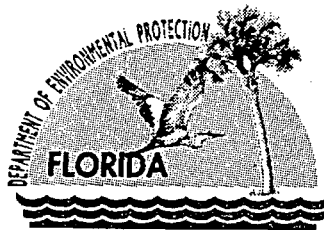
Telephone: 850/488-0114
Fax: 850/922-6979

Title V Air Operation Permit Revision

DRAFT Permit No.: 0730003-007-AV

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Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

Permittee:

City of Tallahassee
300 South Adams Street
Tallahassee, Florida 32301

DRAFT Permit No.: 0730003-007-AV

Facility ID No.: 0730003

SIC Nos.: 49, 4911

Project: Title V Air Operation Permit Revision

This permit revision is for the operation of the Arvah B. Hopkins Generating Station. This facility is located at 1125 Geddies Road, Tallahassee, Leon County. This Title V Air Operation Permit Revision incorporates the excess emissions condition from Permit No. 0730003-006-AC into the Title V Air Operation Permit.

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Phase II Acid Rain Permit Application/Compliance Plan Received July 1, 2002
Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)
Appendix TV-4, Title V Conditions (version dated 2/12/02)
ASP Number 97-B-01
Scrivener's Order Correcting ASP Number 97-B-01 (dated July 9, 1997)

Effective Date: January 1, 2003

1st Revision Effective Date: Day 55

Renewal Application Due Date: July 5, 2007

Expiration Date: December 31, 2007

Michael G. Cooke, Director,
Division of Air Resource Management

MGC/jkp/jh

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of two fossil fuel-fired steam generators and two fossil fuel-fired combustion turbines. The two steam generators are Phase II Acid Rain Units. Boiler Number 2 is regulated under the Florida Electrical Power Plant Siting Act. The total (nominal) combined electrical generating capacity from the facility is 356.27 megawatts electric (MW), of which, 313 MW are provided by the steam generators and 43.27 MW are provided by the combustion turbines. The fuels used at this facility are natural gas, fuel oil and on-specification used oil. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the Title V permit renewal application received July 1, 2002, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

Regulated Emissions Units:

E.U. ID

No.

Brief Description

- | | |
|------|---|
| -001 | Boiler Number 1: 903 MMBtu/hour (Phase II Acid Rain Unit) |
| -002 | Combustion Turbine Number 1, 228 MMBtu/hour |
| -003 | Combustion Turbine Number 2, 446 MMBtu/hour |
| -004 | Boiler Number 2: 2,325 - 2,500 MMBtu/hour (Phase II Acid Rain Unit) |

Unregulated emissions Units and/or Activities (See Appendix U-1):

E.U. ID

No.

Brief Description

- | | |
|------|--|
| -005 | Fugitive VOC Sources - Painting Operations |
| -006 | General Purpose Engines |
| -007 | Emergency Generators |

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID Number(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The following documents are part of this permit:

Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Phase II Acid Rain Permit Application/Compliance Plan Received July 1, 2002
Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)
Appendix TV-4, Title V Conditions (version dated 2/12/02)
ASP Number 97-B-01
Scrivener's Order Correcting ASP Number 97-B-01 (dated July 9, 1997)

{Permitting Note: The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.}

These documents are provided to the permittee for information purposes only:

Appendix H-1, Permit History / ID Number Changes
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers (version dated 2/5/97)
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements
Statement of Basis

These documents are on file with the permitting authority:

Title V Permit Renewal Application received July 1, 2002
Department's request for additional information letter dated July 24, 2002
City of Tallahassee letter received July 31, 2002
Response to request for additional information received August 16, 2002
Additional Information regarding insignificant emissions units received September 3, 2002
Title V Permit Revision Application Received September 10, 2004
0730003-006-AC issued Month DD, 2004

Subsection B. This section addresses the following emissions unit(s).

<u>E.U. ID No.</u>	<u>Brief Description</u>
-004	Boiler Number 2, (Phase II Acid Rain Unit)

Emissions unit number 004 is a Babcock & Wilcox steam generator (model number RB-533) designated as "Boiler Number 2". It is rated at a maximum heat input of 2,325 million Btu per hour (MMBtu/hour) when firing fuel oil and 2,500 MMBtu/hour when firing natural gas and a nominal 238 MW and 1,619,000 pounds of steam per hour.

{Permitting notes: This emissions unit is regulated under Acid Rain, Phase II and the Florida Electrical Power Plant Siting Act (permit number PA 74-03D). This emissions unit pre-dates PSD regulations, but is regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input. Stack height = 250 feet, exit diameter = 14.0 feet, exit temperature = 220 - 305°F, actual volumetric flow rate = 636,706 acfm. Emissions from this boiler are uncontrolled. This unit began commercial operation in October of 1977.}

The following conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters.

B.1. Permitted Capacity. The maximum operation heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
-004	2,500	Natural Gas
	2,325	No. 2 - No. 6 Fuel Oil;
		On-Specification Used Oil

Note: When a blend of fuel oil and natural gas is fired, the allowable heat input is prorated based on the percent heat input of each fuel.

[Rules 62-4.160(2), 62-210.200(PTE) & 62-296.405, F.A.C.; and, Applicant request dated June 18, 1997.]

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.}

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **B.26.**
[Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation.

- a. Fuels. The fuels that are allowed to be burned in this boiler are natural gas and/or new No. 2 through No. 6 fuel oil and/or on-specification used oil (See Specific Condition **B.38.**). In case of a natural gas curtailment, liquefied petroleum gas (LPG) may be used as an igniter fuel for the fuel oil.
- b. Other. Fuel additives typically of a magnesium oxide, hydroxide, sulfonate, or calcium nitrate origin may be used.

[Rule 62-213.410, F.A.C.; and, Applicant's request in Title V permit renewal application dated July 1, 2002.]

B.4. Hours of Operation. This emissions unit may operate continuously, i.e. 8760 hours/year. The permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation, including a detailed account of the hours operated on each of the allowable fuels.

[Rule 62-210.200(PTE), F.A.C.; and, applicant request in Title V permit renewal application received July 1, 2002.]

Emission Limitations and Standards.

{Permitting Note: The attached Table 1-1, Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

{Permitting note: Unless otherwise specified, the averaging times for conditions B.5. – B.10. are based on the averaging time of the applicable test method.}

B.5. Visible Emissions. Visible emissions shall not exceed 20 percent opacity, except for one six-minute period per hour during which opacity shall not exceed 27 percent.

[Rule 62-296.405(1)(a), F.A.C.; and applicant request.]

B.6. Visible Emissions. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

[Rule 62-210.700(3), F.A.C.]

B.7. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(b), F.A.C.]

B.8. Particulate Matter. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700(3), F.A.C.]

B.9. Sulfur Dioxide. Sulfur dioxide emissions when burning liquid fuel shall not exceed 1.87 pounds per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(c)1.h., F.A.C.]

B.10. Sulfur Dioxide. For compliance purposes, the following limit supersedes the limit contained in **Specific Condition B.9.** Sulfur dioxide emissions shall not exceed 1.4 pounds per million Btu heat input, as measured by applicable compliance methods. Any calculations used to demonstrate compliance shall be based solely on the heating value, quantities, and the percent sulfur of the liquid and gaseous fuels being burned. (See specific conditions **B.11. & B.24.**)

[Rule 62-204.220 & .240, F.A.C.; AO37-242825 specific condition 4; and, Applicant's request in Title V permit renewal application received July 1, 2002.]

B.11. Fuel Sulfur. Fuel sulfur content (percent, by weight) shall be determined by a fuel analysis representative of all "as-fired" fuels. Prior to burning any fuels in the boiler pursuant to this permit, receipts of the analyses of the existing fuels shall have been received by the City in order to use their values and calculate a maximum allowable fuel blend of natural gas and fuel oil. Upon subsequent fuel deliveries, if the vendor's delivery receipts indicate that the sulfur content of the delivered fuel is greater than the sulfur content established by the previous analysis, then a new maximum allowable fuel blend shall be calculated using the assumption that any future fuel fired contains the higher sulfur content. The resulting maximum allowable fuel blend shall be adhered to until such time that a more accurate analysis has been provided. If the vendor's delivery receipt indicates that the sulfur content of the delivered fuel is less than the sulfur content previously established, a new analysis is only necessary if the permittee wishes to adjust the previously established maximum allowable fuel blend. (See specific conditions **B.10. and B.24.**)

[Rules 62-4.070(3) & 62-296.405(1)(c)3., F.A.C.; and, Applicant Requests dated June 18, 1997 & July 1, 2002.]

B.12. Nitrogen Oxide. Nitrogen oxide emissions shall not exceed 0.3 pounds per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(d)3., F.A.C.]

Excess Emissions.

B.13. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

B.14. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.]

B.15. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

B.16. Excess visible emissions resulting from fuel switching, startup or shutdown of an individual burner, or minor load changes shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of such excess visible emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. A "minor load" change means a change in the operational load of the unit, other than startup or shutdown, which is between 2 percent and 10 percent of the unit's rated capacity and occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700 (5), F.A.C.; and, 0730003-006-AC.]

Monitoring of Operations.

{Permitting Note: In accordance with the Acid Rain Phase II requirements, the following continuous monitors are installed on this unit: Gas Fuel Flow, Oil Fuel Flow, NO_x and CO₂.}

[Rules 62-296.405(1)(f)1.c. & d., 62-214.320 and 62-214.330, F.A.C.; 40 CFR Part 75 Appendix D, Section 2.1]}

B.17. Sulfur Dioxide. The permittee elected to demonstrate compliance using fuel sampling and analysis. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions **B.11. and B.24.** of this permit.

[Rule 62-296.405(1)(f)1.b., F.A.C.]

B.18. Nitrogen Oxides. For emission units that are subject to continuous monitoring requirements under 42 U.S.C. sections 7661-7661f or 40 CFR Part 75, compliance with nitrogen oxides emission limits shall be demonstrated based on a 30-day rolling average, except as specifically provided by 40 CFR Parts 60 or 76.

[Rule 62-296.405(1)(e)4., F.A.C.]

B.19. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall

be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures.

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.20. Visible emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See specific condition **B.21.**
[Rule 62-296.405(1)(e)1., F.A.C.]

B.21. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
 - a. For the basic part of the standard (i.e., 20 percent opacity), the opacity shall be determined as specified above for a single-valued opacity standard.
 - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.
[Rule 62-297.401(9)(c), F.A.C.]

B.22. Particulate Matter. The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat

analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-296.405(1)(e)2. and 62-297.401, F.A.C.]

B.23. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedances of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee elected to demonstrate compliance by using fuel sampling and analysis.** See specific conditions B.11. and B.24.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.401, F.A.C.; and, AO37-242825.]

B.24. The following fuel sampling and analysis protocol shall be used as an alternate sampling procedure authorized by permit to demonstrate compliance with the sulfur dioxide standard and to provide the necessary values needed to calculate a maximum allowable fuel blend:

- a. Establish and maintain a record of the sulfur content (percent, by weight) of the "as-fired" fuel oil using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or equivalent, to analyze a representative sample of the blended fuel following each fuel delivery. This record may be maintained either by;
 - 1) retaining the delivery receipts that are provided by the fuel oil vendor (which indicates that the proper ASTM test methods have been followed) each time a fuel oil delivery is received, or;
 - 2) by "as-fired" sample results provided by the permittee.
- b. Establish and maintain a record of the sulfur content of the "as-fired" natural gas using either ASTM D1072-90(94)E-1, ASTM D3031-81(86), ASTM D3246-92, ASTM D4084-94, ASTM D5504-94, or equivalent. This record may be maintained either by;
 - 1) retaining delivery receipts provided by the natural gas vendor (which indicates that the proper ASTM test methods have been followed and which shall be provided, at a minimum, each time there is a measurable increase in the sulfur content of the natural gas), or;
 - 2) by on-site sample results provided by the permittee, or;
 - 3) by utilizing the FERC Tariff guaranteed maximum sulfur content of 10 grains per 100 cubic feet of natural gas as a "default value".
- c. Establish and maintain a record of either the density (using ASTM D 1298-80, or equivalent), or the mass, and the calorific heat value in Btu per pound (using ASTM D 240-76, or equivalent), of the fuel oil combusted. This record may be maintained either by;
 - 1) retaining the delivery receipts that are provided by the fuel oil vendor (which indicates that the proper ASTM test methods have been followed) each time a fuel oil delivery is received, or;

- 2) by on-site sample results provided by the permittee, or;
- 3) by utilizing data provided by a certified continuous mass flow monitor in accordance with 40 CFR 75, Appendix D.
- d. Record daily the amount of each fuel fired, the sulfur content (percent, by weight) of each fuel, either the density or mass of the fuel oil, and the calorific heat value of each fuel. For all fuels fired, the highest value for any parameter (i.e., density, calorific heat value, etc.) that has been established by the vendor's receipt shall be utilized until an as-fired fuel analysis is received to establish a new value for the parameter in question.
- e. Utilize the information in a., b. c. and d., above, to calculate the SO₂ emission rate to ensure compliance at all times.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. & 62-297.440, F.A.C.; and, Applicant Requests dated July 10, 1997 & July 1, 2002]

Compliance Test Requirements.

B.25. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

B.26. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

B.27. Operating Conditions During Testing. If particulate matter and visible emissions tests are required, the tests shall be conducted concurrently and shall be performed using the maximum fuel oil to natural gas ratio that can be fired while meeting the standards.

[Rule 62-4.070(3), F.A.C.; and, Applicant requests dated June 18, 1997 & July 1, 2002.]

B.28. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

B.29. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

TABLE 297.310-1
CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		Comparison check	5%

B.30. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

B.31. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) **General Compliance Testing.**

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid for more than 400 hours other than during startup.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - a. Did not operate; or,
 - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard (see **specific condition B.32.**);
 - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
 - c. Each NESHAP pollutant, if there is an applicable emission standard.
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours (see **specific condition B.33.**);.
9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) **Special Compliance Tests.** When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct

compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

- (c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, SIP Approved.]

B.32. Visible Emissions Testing - Annual. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or,
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or,
- c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

B.33. Particulate Matter Testing - Annual and Permit Renewal. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or,
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or,
- c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

Recordkeeping and Reporting Requirements.

B.34. The owner or operator shall maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. These records must be of sufficient detail to determine compliance with the allowable sulfur dioxide emission limitation.

[Rule 62-4.070(3), F.A.C.]

B.35. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

B.36. Quarterly Reports. Submit to the Department a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of

the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

B.37. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
 - 1. The type, location, and designation of the emissions unit tested.
 - 2. The facility at which the emissions unit is located.
 - 3. The owner or operator of the emissions unit.
 - 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 - 5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 - 6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 - 7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 - 8. The date, starting time and duration of each sampling run.
 - 9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
 - 10. The number of points sampled and configuration and location of the sampling plane.
 - 11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
 - 12. The type, manufacturer and configuration of the sampling equipment used.
 - 13. Data related to the required calibration of the test equipment.
 - 14. Data on the identification, processing and weights of all filters used.
 - 15. Data on the types and amounts of any chemical solutions used.
 - 16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
 - 17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
 - 18. All measured and calculated data required to be determined by each applicable test procedure for each run.
 - 19. The detailed calculations for one run that relate the collected data to the calculated emission rate.

20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

Miscellaneous Conditions.

B.38. Used Oil. Burning of on-specification used oil is allowed in this emissions unit in accordance with all other conditions of this permit and the following conditions:

- a. **On-specification Used Oil Emissions Limitations.** This emissions unit is permitted to burn on-specification used oil, which contains a PCB concentration of less than 50 ppm. On-specification used oil is defined as used oil that meets the specifications of 40 CFR 279 - Standards for the Management of Used Oil, listed below. "Off-specification" used oil shall not be burned. Used oil which fails to comply with any of these specification levels is considered "off-specification" used oil.

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash point	100 degrees F minimum

- b. **Quantity Limitation.** This emissions unit is permitted to burn "on-specification" used oil that is generated by the City of Tallahassee, not to exceed 10,000 gallons during any calendar year.
- c. **PCB Limitation.** Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement.
- d. **Operational Requirements.** On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.

- e. Testing Requirements: For each batch of used oil to be burned, the owner or operator must be able to demonstrate that the used oil qualifies as on-specification used oil and that the PCB content is less than 50 ppm.

The requirements of this demonstration are governed by the following federal regulations:

Analysis of used oil fuel. A generator, transporter, processor/re-refiner, or burner may determine that used oil that is to be burned for energy recovery meets the fuel specifications of Sec. 279.11 by performing analyses or obtaining copies of analyses or other information documenting that the used oil fuel meets the specifications.
[40 CFR 279.72(a)]

Testing of used oil fuel. Used oil to be burned for energy recovery is presumed to contain quantifiable levels (2 ppm) of PCB unless the marketer obtains analyses (testing) or other information that the used oil fuel does not contain quantifiable levels of PCBs.

- (i) The person who first claims that a used oil fuel does not contain quantifiable level (2 ppm) PCB must obtain analyses or other information to support that claim.
- (ii) Testing to determine the PCB concentration in used oil may be conducted on individual samples, or in accordance with the testing procedures described in Sec. 761.60(g)(2). However, for purposes of this part, if any PCBs at a concentration of 50 ppm or greater have been added to the container or equipment, then the total container contents must be considered as having a PCB concentration of 50 ppm or greater for purposes of complying with the disposal requirements of this part.
- (iii) Other information documenting that the used oil fuel does not contain quantifiable levels (2 ppm) of PCBs may consist of either personal, special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the oil contains no detectable PCBs.

[40 CFR 761.20(e)(2)]

When testing is required, the owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs.

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

In addition to the above requirements, the owner or operator shall sample and analyze each batch of used oil to be burned for the sulfur content (by weight), density and heat content in accordance with approved test methods.

- f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
- (1) The gallons of on-specification used oil placed into inventory to be burned and the gallons of on-specification used oil burned each month.

- (2) Results of the analyses of each deposit of used oil, as required by the above conditions.
- (3) Other information, besides testing, used to make a claim that the used oil meets the requirements of on-specification used oil or that the used oil contains less than 50 ppm of PCBs.

[40 CFR 279.72(b), 40 CFR 279.74(b) and 40 CFR 761.20(e)]

- g. Reporting Requirements: The owner or operator shall submit, with the Annual Operation Report form, the analytical results required above and the total amount of on-specification used oil placed into inventory to be burned and the total amount of on-specification used oil burned during the previous calendar year.

[Rule 62-4.070(3) and 62-213.440, F.A.C., 40 CFR 279 and 40 CFR 761, unless otherwise noted.]

Appendix H-1, Permit History/ID Number Changes

City of Tallahassee
Arvah B. Hopkins Generating Station

DRAFT Permit No.: 0730003-007-AV
Facility ID No.: 0730003

Permit History (for tracking purposes):

<u>E.U.</u> <u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue / Effective</u> <u>Date</u>	<u>Expiration</u> <u>Date</u>	<u>Extended</u> <u>Date</u> ^{1,2}	<u>Revised Date(s)</u>
-001	Boiler Hopkins #1	AO37-242825	03/08/94	03/01/99		
-002	Combustion Turbine Hopkins #1	AO37-242824	03/08/94	12/31/98		06/10/94, 06/24/94
-003	Combustion Turbine Hopkins #2	AO37-242824	03/08/94	12/31/98		06/10/94, 06/24/94
-004	Unit #2 Boiler	PA74-03D	05/20/75			05/18/94, 10/27/86
All	Initial Title V Permit	0730003-001-AV	01/01/98	12/31/02		
All	Admin Correction To Update Appendix TV-1 to TV-2	0730003-002-AV	01/02/98	12/31/02		
All	Title V Permit Renewal	0730003-003-AV	01/01/03	12/31/07		
-002	Establish excess VE for minor load change	0730003-006-AC	??????	5/31/05		
-002	Title V revision to incorporate 0730003-006-AC	0730003-007-AV	????	12/31/07		

Phase II Acid Rain Part Application

For more information, see Instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission is: ☐ New ☐ Revised ☒ Renewal

STEP 1

Identify the source by plant name, State, and ORIS code from NADB

Plant Name: Arvah B. Hopkins Generating Station

State: Florida

ORIS Code: 688

STEP 2 Enter the unit ID# for each affected unit and indicate whether a unit is being repowered and the repowering plan being renewed by entering "yes" or "no" at column c. For new units, enter the requested information in columns d and e.

Compliance Plan				
a	b	c	d	e
Unit ID#	Unit will hold allowances in accordance with 40 CFR 72.9(c)(1)	Repowering Plan	New Units Commence Operation Date	New Units Monitor Certification Deadline
Boiler No. 1 (EU ID No. 001)	Yes	No		
Boiler No. 2 (EU ID No. 004)	Yes	No		
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			

STEP 3

Check the box if the response in column c of Step 2 is "Yes" for any unit

☐ For each unit that is being repowered, the Repowering Extension Plan form is included.

STEP 4

Read the standard requirements and certification, enter the name of the designated representative, and sign and date

Plant Name: Arvah B. Hopkins Generating Station

Standard Requirements

Acid Rain Part Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the Department determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain part;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the Department; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(i) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain part application, the Acid Rain part, or an exemption under 40 CFR 72.7, 72.8, or 72.14 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the Department:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and

Plant Name: Arvah B. Hopkins Generating Station

Recordkeeping and Reporting Requirements (cont)

(iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or an exemption under 40 CFR 72.7, 72.8 or 72.14, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.

(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.

(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.

(4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.

(5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.

(6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

(7) Each violation of a provision of 40 CFR parts 72, 73, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities. No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or an exemption under 40 CFR 72.7, 72.8, or 72.14 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;

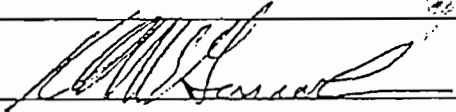
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name: Robert E. McGarrah, Manager of Power Production, City of Tallahassee	
Signature: 	Date: July 1, 2002

Friday, Barbara

To: PowellJ@talgov.com; Allen, Andy; Veazey, Sandra; Oven, Hamilton

Cc: Holtom, Jonathan

Subject: DRAFT Title V Permit Revision No. 0730003-006-AC/0730003-007-AV - City of Tallahassee - Arvah B. Hopkins

Find attached two zip files for subject DRAFT Title V Permit Revision and Draft Air Construction Permit for your information and files.

If I may be of further assistance, please feel free to contact me.

Barbara J. Friday
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10/29/2004