



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

May 7, 2008

ELECTRONIC MAIL – Read Receipt Requested

Mr. Robert E. McGarrah
Manager Power Production
City of Tallahassee, Electric Utilities
Arvah B. Hopkins Generating Station
2602 Jackson Bluff Road
Tallahassee, Florida 32304

RE: Requested Amendment to Air Permit No. 0730003-009-AC
Arvah B. Hopkins Generating Station
Unit 2 Re-Powering Project

Dear Mr. McGarrah:

Thank you for your letter received by electronic mail on April 25 requesting an amendment to permit No. 0730003-009-AC to provide for the possibility of having to startup the new combustion turbine and run in exclusively simple cycle mode throughout the summer. We understand that this may need to happen if further construction delays prevent the startup in combined cycle mode in time to meet the summer electrical generation demand requirements. While not in the original design to run for extended periods of time in simple cycle mode, we believe the permit does make provisions for simple cycle operation.

In addition, pursuant to Rule 62-210.300(3)(a) 34, Florida Administrative Code (F.A.C.), the proposed 28.8 MMBtu/hr natural gas-fired boiler needed to preheat the fuel for simple cycle operation is exempt from the requirements to obtain an air construction permit, provided that the boiler does not burn more than 150 million standard cubic of gas in a 12 month period. The PSD issue for CO emissions should not be a problem since the 99 ton per year increase authorized by this project includes emissions of CO from the duct burner. Since this 28.8 MMBtu/hr boiler will only be in operation when the 765 MMBtu/hr duct burner is not available, the total CO emissions for the year should be significantly less than if the duct burner was in operation for the entire year. Because fuel heating is required for simple cycle operation, it would be a good idea to consider adding the operation of a fuel heating boiler that meets the requirements of the categorical exemption to the list of insignificant emissions units available for use at the Hopkins facility the next time the Title V permit is opened for revision or renewal. As long as the insignificant unit is identified in the permit, then a rental boiler could be brought on-site if extended simple cycle operation is ever needed in the future.

If startup and continued operation in simple cycle mode is required throughout the summer, initial compliance testing will be required within 60 days of achieving the maximum production rate at

Mr. Robert McGarrah, Manager Power Production
City of Tallahassee, Electric Utilities
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which the unit will be operated on natural gas (Permit No. 0730003-009-AC, Specific Condition 26.). Once the HRSG construction is completed, initial testing will need to be conducted for combined cycle operation on both natural gas and fuel oil.

Please be sure to keep the compliance office notified of all anticipated start ups and testing dates. If you should have any further questions, please contact Jonathan Holtom, P.E., at (850) 921-9531.

Sincerely,

A handwritten signature in black ink, appearing to read "Trina Vielhauer", written over a horizontal line.

Trina Vielhauer, Chief
Bureau of Air Regulation

cc: Mr. John Powell, City of Tallahassee
Mr. Rick Bradburn, NWD
Mr. Tracy White, NWDT

Harvey, Mary

From: Harvey, Mary
Sent: Wednesday, May 07, 2008 2:43 PM
To: 'Mr. John Powell, City of Tallahassee, Electric Utilities'; Bradburn, Rick; White, Tracy A.
Cc: Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria
Attachments: Document.pdf

Tracking:	Recipient	Delivery	Read
<input checked="" type="checkbox"/>	Mr. John Powell, City of Tallahassee, Electric Utilities'		
<input checked="" type="checkbox"/>	Bradburn, Rick	Delivered: 5/7/2008 2:43 PM	
<input checked="" type="checkbox"/>	White, Tracy A.	Delivered: 5/7/2008 2:43 PM	Read: 5/7/2008 2:43 PM
<input checked="" type="checkbox"/>	Holtom, Jonathan	Delivered: 5/7/2008 2:43 PM	
<input checked="" type="checkbox"/>	Walker, Elizabeth (AIR)	Delivered: 5/7/2008 2:43 PM	
<input checked="" type="checkbox"/>	Gibson, Victoria	Delivered: 5/7/2008 2:43 PM	Read: 5/7/2008 2:47 PM

Dear Sir/Madam:

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

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

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:

<http://www.adobe.com/products/acrobat/readstep.html>.

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

Thank you,
 DEP, Bureau of Air Regulation

5/7/2008

Harvey, Mary

From: Bradburn, Rick
To: Harvey, Mary
Sent: Wednesday, May 07, 2008 3:24 PM
Subject: Read:

Your message

To: 'Mr. John Powell, City of Tallahassee, Electric Utilities'; Bradburn, Rick; White, Tracy A.
Cc: Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria
Subject:
Sent: 5/7/2008 2:43 PM

was read on 5/7/2008 3:24 PM.

Harvey, Mary

From: Gibson, Victoria
To: Harvey, Mary
Sent: Wednesday, May 07, 2008 2:47 PM
Subject: Read:

Your message

To: 'Mr. John Powell, City of Tallahassee, Electric Utilities'; Bradburn, Rick; White, Tracy A.
Cc: Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria
Subject:
Sent: 5/7/2008 2:43 PM

was read on 5/7/2008 2:47 PM.

Harvey, Mary

From: Powell, John [John.Powell@talgov.com]
To: Harvey, Mary
Sent: Wednesday, May 07, 2008 2:50 PM
Subject: Read:

Your message

To: John.Powell@talgov.com
Subject:

was read on 5/7/2008 2:50 PM.

Harvey, Mary

From: White, Tracy A.
To: Harvey, Mary
Sent: Wednesday, May 07, 2008 2:43 PM
Subject: Read:

Your message

To: 'Mr. John Powell, City of Tallahassee, Electric Utilities'; Bradburn, Rick; White, Tracy A.
Cc: Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria
Subject:
Sent: 5/7/2008 2:43 PM

was read on 5/7/2008 2:43 PM.