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May 11, 2004

HAND DELIVERED

Mr. Mike Halpin, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, FL 32301

RECEIVED

MAY 11 2004

BUREAU OF AIR REGULATION

RE: Arvah B. Hopkins Generating Station; Facility No. 0730003
Air Construction Permit Application for Temporary Combustion Turbines
Request for Performance Test Waiver

Dear Mr. Halpin:

On behalf of the City of Tallahassee (City), I want to extend to you our sincerest appreciation for quickly processing the above-referenced air permit application. The public notice comment period closed on May 10, 2004, and we understand the Florida Department of Environmental Protection (Department) will be issuing Air Construction Permit No. 0730003-004-AC (Construction Permit) this week. As a follow-up to the Construction Permit, however, we would like to address some New Source Performance Standard (NSPS) requirements.

As you know, the Construction Permit, once issued, would authorize the temporary and limited use of twenty-three (23) small (nominal 5.5 megawatts each) natural gas-fired simple cycle combustion turbines at the Arvah B. Hopkins Generating Station. NSPS Subpart GG applies to these units and by this letter the City is requesting authorization to test four representative units using either U.S. Environmental Protection Agency (EPA) Method 20 or Method 7E once any four units reach 100 hours of individual operation. In addition, the City requests a waiver of the 30-day notice requirement because of the temporary nature of these units. In support of its requests, the City is providing the following information.

The twenty-three Solar Taurus 60 units, built in 2000 and 2001, are all identical units. At least nineteen of these twenty-three units have undergone performance testing in the past, at three different loads. We understand from information provided by Alstom, the provider of the Solar Taurus units, that these tests were conducted using a method which meets the intent and purpose of U.S. EPA Method 20. The gas turbine emissions test specifications provided by Alstom are attached hereto as Attachment A.

The Construction Permit requires that additional performance testing be conducted on four representative units (once each unit operates for more than 100 hours). The results of five of the tests that have already been performed were provided to you on April 16, 2004. Attached hereto as Attachment B are the results of initial performance testing for an additional fourteen of the Taurus 60 units.

The results of these nineteen performance tests indicate a wide margin between the tested emission levels and the NSPS emission limit of approximately 100 parts per million (ppm) for nitrogen oxides (NOx). Specifically, the test results show NOx emission levels ranging from 5 to 21 ppmvd and averaging 14 ppmvd (at 15% O2 and ISO conditions), which is well below the standard.

In addition, because there is insufficient stack height on the Solar Taurus 60 units to meet the requirements of an EPA Method 20 test, the City is requesting the authority to utilize EPA Method 7E which is a widely utilized and accepted method for determining NOx emissions from stationary sources. A drawing of the Solar Taurus 60 stack and sample ports with the associated dimensions is attached hereto as Attachment C.

We understand that 40 C.F.R. 60.8(b) provides that if the owner or operator of a source has demonstrated that the affected facility is in compliance with the standard, a waiver can be granted. We submit that between the performance testing that has been completed to date on nineteen of the units, and the City's proposed performance testing on the four remaining units, there is sufficient data to demonstrate compliance with the NOx emissions standard under 40 C.F.R. 60.332 for all twenty-three units.

The City is also requesting a waiver of the 30-day prior notice requirement for the performance tests. Because the units will be operated only if the City is unable to produce and import sufficient electricity to meet its customers demands and only for a period from the end of May through September 30, 2004, at the latest, the City anticipates that it may not operate these units at all, and if so, only for a very limited number of hours (maximum 11,500 hours combined). If the City finds itself in a situation where at least some of the individual units will need to be operated for more than 100 hours, the City is proposing, as stated above, to conduct performance testing on four representative units. In this situation, however, it may be impossible to provide 30-days prior notice of the performance testing. The City therefore requests a waiver of the 30-day notice and requests acceptance of a 7-day prior notice instead (which is allowed for rescheduled tests).

We believe that the Department has been delegated the authority to grant waivers of emission tests under 40 C.F.R. 60.8(b), as well as waivers of the 30-day notice requirement. If not, would you please forward this request to the U.S. EPA, Region IV. Because the units will be located on the site for only a brief period of time from late May through September 30, 2004, at the very latest, and because the units will be operated only if other sources of electricity are unavailable to meet the demands of the City's customers, we sincerely hope that this request can be expedited.

Thank you for your continued assistance with this project. If you have any questions or need any additional information to process this request, please call me at (850) 891-8850 or call our consultant, Ken Kosky with Golder Associates, at (352) 336-5600.

Sincerely,



Jennette Curtis
Environmental Services Administrator
Attachments

cc: Hamilton S. Oven, Jr., w/o attachments
Scott Goorland, w/o attachments
Gerald Neubauer, w/o attachments
Rob McGarrah, w/o attachments
Triveni Singh, w/o attachments
John Powell, w/o attachments
Ken Kosky, w/o attachments