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BUREAU OF AIR REGULATION

August 3, 2004

Via Fax and Certified Mail No.: 70010360000207628226

Trina Vielhauer
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, M.S. 5500
Tallahassee, Florida 32399

Re: Proposed Air Construction and Title V Permit Revision Language
Boiler Number 2 (EU-004)
Arvah B. Hopkins Generating Station
Title V Air Operation Permit No. 0730003-003-AV

Dear Ms. Vielhauer:

On behalf of the City of Tallahassee (City), I would like to thank you and your staff for meeting with representatives of the City on July 30, 2004, to further discuss the elevated opacity levels recorded at the Arvah B. Hopkins Generating Station Boiler Number 2. As requested, the City has prepared the following language to be submitted via an air construction permit and request for revision to the Hopkins Title V Air Operation Permit. This proposed language addresses the conditions that occur during the operation of Boiler Number 2 which are associated with very short duration increases in visible emissions.

The existing Title V Air Operation Permit states:

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.]

The City is proposing the following language be added:

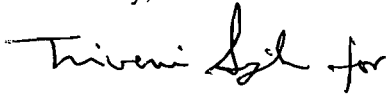
In accordance with Rule 62-210.700(5), F.A.C., excess visible emissions resulting from fuel switching, startup or shutdown of an individual burner, or minor load changes shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of such excess visible emissions shall be minimized but in no case shall such excess visible emissions and excess emissions resulting from malfunction 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.

The City would appreciate any feedback you and your staff could provide on the proposed permit revision language. The City is prepared to file an Air Construction Permit Application and corresponding Title V Air Operating Permit Revision Application upon receipt of confirmation that the Department supports this approach.

Thank you again for your assistance with this important matter. Please do not hesitate to contact me at (850) 891-5534 or Jennette Curtis, Environmental Services Administrator at (850) 891-8850, if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Triveni Singh for", written over a horizontal line.

Robert E. McGarrah
Manager of Power Production

cc: Sandra Veazey, FDEP
Pat Comer, FDEP
Jim Pennington, FDEP
Johnathan Holtom, FDEP
Gerald Neubauer, FDEP
Triveni Singh, COT
Jennette Curtis, COT
John Powell, COT
Peter Cunningham, HGS



300 South Adams Street, Tallahassee, Florida 32301, (850) 891-4YOU (4968), talgov.com

April 30, 2004

Certified Mail No.: 70010360000207628042

Trina Vielhauer
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, M.S. 5000
Tallahassee, Florida 32399

Re: Boiler Number 2 (EU-004)
Arvah B. Hopkins Generating Station
Title V Air Operation Permit No. 0730003-003-AV

RECEIVED

MAY 05 2004

BUREAU OF AIR REGULATION

Dear Ms. Vielhauer:

I wanted to take this opportunity to thank you and your staff for meeting with representatives of the City of Tallahassee (City) on April 9, 2004, to discuss the elevated opacity levels recorded at the Arvah B. Hopkins Generating Station (Hopkins) Boiler Number 2 (EU-004) and the City's desire to obtain alternative opacity limits to address these circumstances. This letter also provides additional information regarding the causes of the elevated levels observed in January 2004.

As we discussed, Hopkins Unit 2 recently lost its gas-fired designation pursuant to 40 CFR Part 75 and was required to install a continuous opacity monitor (COM). The COM officially began recording opacity for purposes of the Acid Rain program on January 1, 2004. Provided for your convenience is a copy of the first quarter COM report for calendar year 2004 required under Part 75 (Attachment A), which has been submitted to the Department's Northwest District Office.

As you are aware, the COM recorded five 6-minute instances during the quarter where opacity levels were above the limits specified in the Hopkins Title V Air Operation Permit (Title V Permit) and not attributable to startup, shutdown or malfunction conditions. As noted on the attached COM report (Attachment A), the total duration of these instances accounted for only 0.0262% of the Unit 2 operating time during the quarter.

Upon further review of the available data, we have identified five operational scenarios for Unit 2 that may result in elevated opacity levels, other than startup, shutdown or malfunction conditions. These operational scenarios, as indicated on the summary description of excess emissions for January 2004 provided as Attachment B, are:

- Startup of an individual burner(s)
- Shutdown of an individual burner(s)
- Burner Maintenance
- Fuel Switching
- Load Changes

As shown on Attachment B, the COM indicated opacity levels in excess of 40 percent during four of the five six-minute periods. The occurrence on January 13th was during a load change, and would be authorized pursuant to the third paragraph of Rule 62-210.700(3) now that a COM has been installed in Unit 2.

Prior to our meeting on April 9th, the City had advised the Department of its election of quarterly particulate emission compliance testing, in order to obtain a 40 percent opacity limit for Hopkins Unit 2 under Rule 62-296.405(1)(a), F.A.C. We very much appreciate your suggestion of an alternative approach that is more closely tied to the specific operational conditions that may result in elevated opacity levels. We recognize that the Department may authorize adjustment of the opacity limits for Hopkins Unit 2 pursuant to Rule 62-210.700(5), F.A.C. We also understand that several other facilities in Florida currently have at least some of the operational conditions listed above included in the excess emissions provisions of their Title V Permits.

As we discussed, the City is approaching a time of increased electrical demand and corresponding fuel consumption, and therefore would like to address and resolve this matter at the Department's earliest convenience. Upon review of this information by members of your staff, we would appreciate any feedback regarding the specific revisions to the Hopkins Unit 2 Title V Permit that would be appropriate. The City is prepared to file a request for the necessary permit revisions, in lieu of its election of quarterly particulate emissions compliance testing, upon receipt of confirmation that the Department supports this approach.

Thank you again for your attention to this matter. Please do not hesitate to contact me at (850) 891-5534 or Jennette Curtis, Environmental Services Administrator at (850) 891-8850, if you have any questions or require additional information.

Sincerely,



Robert E. McGarrah
Manager of Power Production

Attachment

cc: Larry George, FDEP
Jim Pennington, FDEP
Jonathan Holtom, FDEP
Sandra Veazey, FDEP
Gerald Neubauer, FDEP
Triveni Singh, COT
Jennette Curtis, COT
John Powell, COT

Attachment A

SUMMARY REPORT--GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

[Note: This form is referenced in 40 CFR 60.7, Subpart A-General Provisions]

Pollutant (Circle One): ☐ SO₂ ☐ NO_x ☐ TRS ☐ H₂S ☐ CO ☒ Opacity

Reporting period dates: From January 1, 2004 to March 31, 2004

Company: City of Tallahassee, Arvah B. Hopkins Generating Station (Facility I.D. No. 0730003)

- Emission Limitation:
- 20% except for one 6-minute period per hour during which opacity shall not exceed 27%;
 - 60% during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change;
 - Excess emissions from malfunction are permitted for two hours in any 24 hour period;
 - Excess emissions from startup or shutdown are permitted.

Facility Address: 1125 Geddie Road, Tallahassee, Leon County, Florida 32304

Monitor Manufacturer: Spectrum Systems, Inc.

Model No.: Spectrum 41

Date of Latest CMS Certification or Audit: 2003

Process Unit(s) Description: Boiler Number 2 (EU-004)

Total source operating time in reporting period ¹: 114,336 minutes

Emission data summary ¹	CMS performance summary ¹
1. Duration of excess emissions in reporting period due to ² :	1. CMS downtime in reporting period due to:
a. Control equipment problems <u>0</u>	a. Monitor equipment malfunctions <u>0</u>
b. Process problems <u>0</u>	b. Non-Monitor equipment malfunctions <u>0</u>
c. Other known causes ³ <u>24</u>	c. Quality assurance calibration <u>0</u>
d. Unknown causes <u>6</u>	d. Other known causes <u>0</u>
	e. Unknown causes <u>0</u>
2. Total duration of excess emissions <u>30</u>	2. Total CMS Downtime <u>0</u>
3. Total duration of excess emissions x (100) / [Total source operating time] <u>0.0262</u> %	3. [Total CMS Downtime] x (100) / [Total source operating time] <u>0.0</u> %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² Excess emissions authorized under Unit No. 2's permit for startup, shutdown, and malfunctions less than 2 hours are not included.

³ Known causes of excess emissions include: fuel switching, minor load changes, and startup/shutdown of individual burners.

I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and information contained in this report are true, accurate and complete.

Name: Robert E. McGarrah

Signature: _____

Date: 4/30/04

Title: Manager of Power Production, Responsible Official

Attachment B

OPACITY EXCESS EMISSIONS REPORT

City of Tallahassee

Arvah B. Hopkins Generating Station

Boiler Number 2 (EU-004)

(Title V Air Operation Permit No. 0730003-003-AV)

Pollutant Monitored: Opacity

Report Period: 01 / 01 / 2004 to 03 / 31 / 04

Date	Start Time	End Time	Value (%)	Reason / Cause
01/08/2004	0554	0600	43.900	Startup individual burners; Minor load change
01/13/2004	0612	0618	61.300	Load change; Startup individual burners; Suspected malfunction
01/14/2004	0900	0906	42.100	Fuel switching; Shutdown individual burners; Burner purging
01/23/2004	1918	1924	29.300	Startup individual burners; Minor load change
01/23/2004	1924	1930	62.100	Startup individual burners; Minor load change

Hopkins # 2

most NPS; PP rating

Which unit?

Is it "existing" unit?

Any discretion to deny?

Can we tell them we'd recommend keeping quarterly testings?

Do they have COMB?

① It doesn't meet load change?
→ why not?

② Communicate w/ Mag Lab for notice before they start up. (Test for opacity & PM specification)

③ ~~But not~~ At least 1 test during Mag Lab startup & then could change limit only during Mag Lab.

Peter Cunningham Intro:

① Aling not need to be changed
② Currently 20% with provision for excursions up to 27%.

③ 2000, 01 & 02 → burning more oil so has to install COMB by end of 2003

→ compliance method in W is method 9

④ 4 instances above 20%

3 for 1 minute

2 for 2-6 minutes

1st quarterly test is scheduled later this month.

→ Bkgrd of rule (energy crisis / quality of oil issue)

Section 120 CAA penalties were a factor.

Questions:

① MagLab is cause of exceedances?

② → no, is only part of the problem. Not necessarily meet 1090 MW change

→ can't say ~~if~~ all exceedances are when Lab is doing something

→ Pundam #8 now carries the load

→ also bc. of using mae oil

③ Where are you on the 6 minute averages?

→

43.99%

61.9%

42.19%

29.37%

62.19%

(maef.)

→ fuel switch

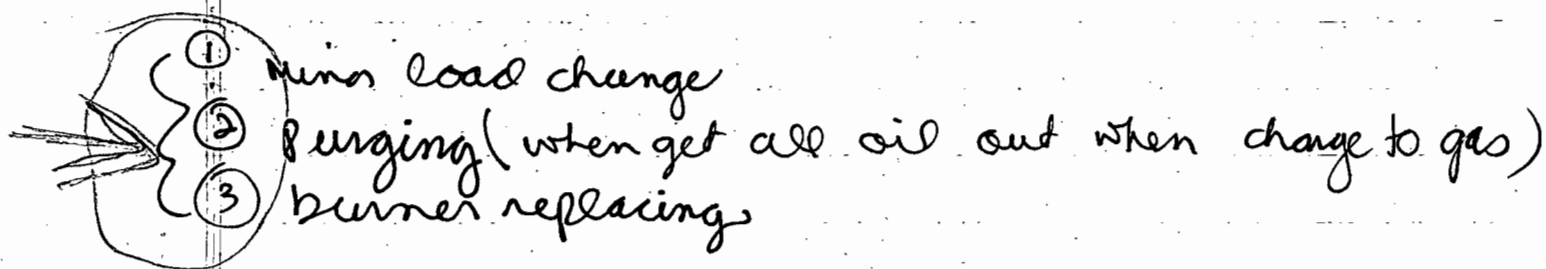
Problem 1: 61% (above the 60%) ^{for} load Δ

→

Problem 2: not meet definition of load change because

Problem 3: is taking out

* fuel switching?



* ④ have an hour-by-hour purchasing that can affect this, too.

* ⑤ load following still meeting .1 lb/mmBtu when at higher % opacity

Process: construction & title V revision

CFR - requests for > opacity

Pricing < \$6 / million Btu - gas
\$5 / mmBtu → oil



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

True,

July 18, 1989

*Larry dropped off
this paperwork for
tomorrow's meeting.*

Mr. Greer C. Tidwell
Regional Administrator
United States Environmental
Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

945 Vicki

Dear Mr. Tidwell:

Attached is the most recent revision to Florida's State Air Implementation Plan which includes a number of corrective amendments. This revision includes amendments to Florida Administrative Code Rules 17-2.100, 17-2.210, 17-2.260, 17-2.300, 17-2.340, 17-2.410, 17-2.420, 17-2.430, 17-2.460, 17-2.500, 17-2.510, 17-2.520, 17-2.540, 17-2.600, 17-2.610, 17-2.650, 17-2.660, 17-2.700, 17-2.710 and 17-2.960.

These amendments were approved by the Environmental Regulation Commission at a duly noticed public hearing April 26, 1989. I certify that the public hearing requirements of 40 CFR 51.102, 40 CFR 51.104 and applicable state laws and regulations have been satisfied. Copies of the certifications of publication are included with the revision.

Based on available evidence, implementation of the revision will not jeopardize the attainment and maintenance of the federal or state ambient air quality standards.

We respectfully request your approval of this revision to the State Air Implementation Plan pursuant to the Clean Air Act as amended, 42 USC 1856 et seq.

Sincerely,

Dale Twachtmann
Dale Twachtmann
Secretary

DT:jw

Enclosure

COMPARATIVE APPRAISAL

CORRECTIVE AMENDMENTS TO CHAPTER 17-2, F.A.C.

The Florida Environmental Regulation Commission approved corrective amendments to Chapter 17-2, Florida Administrative Code (F.A.C.) at a public hearing on April 26, 1989. These amendments were subsequently adopted by the Florida Department of Environmental Regulation by filing with the Florida Secretary of State June 19, 1989. The amendments are effective as of July 9, 1989, and are summarized below:

Clarification of General Prohibitions - Rules 17-2.100(37), 17-2.300(2), and 17-2.500(1)

To comply with EPA's request, a definition of "cause or contribute to" is added along with amended provisions in Rules 17-2.300(2) and 17-2.500(1) to clarify that any new or modified source would be prohibited if its emissions would result in a violation of an applicable ambient air quality standard.

New Exemptions from Permitting Requirements - Rule 17-2.210(3)

Permitting exemptions for boilers are expanded to include larger gas-fired units and others operated only during emergencies. Hot water generators are exempted also. New exemptions are included for auxiliary equipment used by the electric power industry and others, small attainment-area painting facilities, phosphogypsum

disposal areas and cooling ponds, small dry cleaning facilities and small degreasing units.

Updating of Air Quality Modeling Provisions - Rule 17-2.260

Provisions requiring the use of EPA-approved air quality models are updated to reflect the most recent modeling guidelines adopted by the EPA.

Redesignation of Orange County - Rules 17-2.410(1),
17-2.460(1)(b), and 17-2.510(5)

Orange County's federal redesignation to an ozone air quality maintenance area is reflected in these changes.

Correction of PM₁₀ Related Provisions - Rules 17-2.100(145),
17-2.410(2), 17-2.540(2), and 17-2.650(2)

Minor corrections are made to PM₁₀ related provisions to satisfy EPA requirements for SIP approval.

Reformatting of Emission Limiting and Performance Standards for
New Sources - Rules 17-2.600 and 17-2.660

Language is included to explain that federal new source performance standards are controlling unless the state has a more stringent standard for new sources. Where a state standard is

the same or equivalent to a federal standard, the rule language in the section on new sources is replaced by appropriate references to the federal code and Section 17-2.660 wherein the federal new source standards are adopted by reference.

Removal of Ringelmann Chart Limits - Rule 17-2.600

Consistent with EPA's current emission standards, the Ringelmann Chart limits are stricken, leaving only the opacity limits for visible emissions.

Conditional Visible Emission Limits for Kraft Recovery Furnaces - Rule 17-2.600(4)(a)

A condition is added to this subsection making visible emission limits non-applicable if the reading is substantially affected by plume mixing or condensation. In such cases, compliance will be established by the particulate matter emission test results.

Reformatting of Emission Limiting and Performance Standards - Rule 17-2.600

Certain subsections are reformatted for consistency by addressing "existing plants" first, followed by standards for "new plants".

Revision of Maximum Opacity Limits for Boilers - Rules
17-2.600(5) and (6)

A facility may meet the existing maximum limit of 40 percent opacity for two minutes per hour or a new limit of 27 percent opacity for six minutes per hour which is consistent with the EPA's standards. The purpose of the change is to bring as many existing plants as possible under the EPA standard while allowing older units to have brief periods of higher opacity. No significant emission change is expected from this revision.

Revision of "Averaging Times" for Boiler Emissions - Rule
17-2.600(5)

The maximum "two-hour average" provision of the particulate matter, sulfur dioxide, and nitrogen oxides limits for boilers over 250 million Btu/hr is replaced with a phrase clarifying that compliance will be established by applicable test methods.

New Provisions for Dry Cleaning Facilities - Rule 17-2.600(12)

New provisions require monthly records of solvent consumption. The applicability provisions are modified to apply to perchloroethylene facilities located outside of ozone nonattainment areas and having dryer capacity of 10 pounds or more. Petroleum solvent facilities must comply with the regulations depending on their location and annual solvent

consumption instead of dryer capacity. The purpose of these changes is to make the regulations responsive to solvent consumption instead of dryer capacity, since VOC emissions equate directly with actual gallonage consumed. No significant emission change is expected from this revision.

Emission Limits for Concrete Batching Plants - Rule 17-2.600(13)

A visible emission limit for concrete batching plants is added in view of the substantial number of these facilities in Florida. EPA grant conditions required establishing a standard for at least one industry category for which there are no current specific visible emission limits.

Mathematical Corrections to Process Weight Table - Table 610-1

Corrections are made to the process weight table where obvious typographical or rounding errors exist.

Removal of Redundant Language for Nonattainment Area Particulate Matter Exemptions - Rule 17-2.650(2)(a)3.

Under the particulate matter reasonably available control technology applicability provisions, subparagraph 3. is deleted since it is redundant with respect to exemptions 2. and 4. listed in the following paragraph (b).

Reduced Opacity Observation Period for Batch Processes - Rule
17-2.700(1)(d)1.b.

The 12-minute minimum observation period is deleted since batch cycle time could be less than 12 minutes.

Revision of Annual Compliance Testing Requirements - Rule
17-2.700(2)(a)2. and 17-2.700(2)(a)4.

Rule 17-2.700(2)(a)2. presently requires annual compliance testing under soot blowing conditions regardless of operating time and regardless of whether or not soot blowing is done. The revision makes such compliance testing mandatory only in a year during which soot blowing is done and only if the unit operates 400 hours or more during the year.

Updating of EPA Test Methods - Rule 17-2.700(6)(b)

There are a number of new or revised EPA test methods that are adopted by reference. Included are the new instrument methods for O₂, CO₂, SO₂, and NO_x in boiler stacks and TRS from kraft pulp mills. Others include the new ultraviolet, colorimetric and chromatograph methods for NO_x concentrations, and the addition of Appendix F of 40 CFR Part 60 (Quality Assurance Requirements for Continuous Emission Monitoring Systems).

Provision for SO₂ Monitoring by Fuel Sulfur Analysis - Rule
17-2.710(1)(a)2.

To coincide with federal rule 40 CFR Part 60.45(b)(2), a continuous monitoring system for SO₂ will not be required where there is no desulfurization device and the fuel sulfur content is monitored by sampling and analysis.

Correction of Typographical Errors - Rules 17-2/210(1),
17-2.210(1), 17-2.340(1)(c), 17-2.420(3)-(5), 17-2.430(2)

Miscellaneous typographical errors are corrected.

~~or Sources burning gaseous fuel --- 6.20 pounds per million
Btu heat input maximum two-hour average~~

(a) (b) Existing Sources.

1. Visible emissions - ~~Visible emissions with a density of
Number 1 of the Ringelmann Chart (20 percent opacity) except for
either one six-minute period per hour during which opacity shall
not exceed 27 percent, or one two-minute period per hour during
which opacity shall not exceed 40 percent, that a shade as dark
as Number 2 of the Ringelmann Chart (40 percent opacity) shall be
permissible for no more than 2 minutes in any hour~~ The option
selected shall be specified in the source's construction and
operation permits. Sources governed by this visible emission
limit shall test for particulate emission compliance annually and
as otherwise required by Rule Section 17-2.700, F.A.C. ~~For a
period of 30 consecutive months, starting upon resumption of
burning of a coal/oil mixture or July 1, 1985, whichever first
occurs, Florida Power and Light Company's Sanford Unit 4, Volusia
County, shall be allowed visible emissions the density of which
is equal to or less than Number 3.5 of the Ringelmann Chart (76
percent opacity), except during periods of excess emissions as
allowed under 17-2.356 and provided that a shade as dark as
Number 4 of the Ringelmann Chart (86 percent opacity) shall be
allowed during periods of excess emissions, and further provided
that an opacity of 100 percent shall be allowed for a period of
90 full power burn days for the purpose of conducting experiments
of various solid and/or liquid fuel mixtures.~~

Sources electing ~~Sources which elect~~ to test for particulate
matter emission compliance quarterly shall be allowed visible
emissions of ~~with a density of~~ Number 2 of the Ringelmann Chart
(40 percent opacity). The results of such tests shall be
submitted to the Department. Upon demonstration that the
particulate standard has been regularly complied with, the
Secretary, upon petition by the applicant, shall ~~may~~ reduce the
frequency of particulate testing to no less than once annually.

2. Particulate Matter - 0.1 pounds per million Btu heat
input, as measured by applicable compliance methods. ~~maximum two-~~

(6) Fossil Fuel Steam Generators With Less than 250 Million Btu per Hour Heat Input, New and Existing Sources.

The following standards apply to new and existing facilities unless otherwise specified by rule, or by order or permit issued by the Department prior to July 15, 1989.

(a) Visible Emissions - ~~Visible emissions with a density of Number 1 on the Ringelmann Chart (20 percent opacity)~~ except for either one six-minute period per hour during which opacity shall not exceed 27 percent, or one two-minute period per hour during which opacity shall not exceed 40 percent. The option selected shall be specified in the source's construction and operation permits. ~~that A density of 30 percent opacity shall be allowed for Monsanto Textiles Company boiler units 2 and 4, Escambia County, while burning fuel oil in conjunction with waste material derived from waste streams previously discharged into underground wells. A density of 40 percent opacity is permitted for not more than two minutes in any one hour.~~

(b) Particulate Matter - Best available control technology in accordance with as determined pursuant to Rule Section 17-2.630, F.A.C. shall be applied.

(c) Sulfur Dioxide - Best available control technology in accordance with as determined pursuant to Rule Section 17-2.630, F.A.C. shall be applied.

(7) - (11) - No change.

(12) Dry Cleaning Facilities.

~~Except for these facilities exempted in Rule 17-2.616(f) or (g), the following standards shall apply.~~

(a) Except as provided in Rule 17-2.600(12)(b), F.A.C., the owner or operator of any perchloroethylene dry cleaning facility, new or existing, with a total rated dryer capacity of 10 50 pounds of articles or greater shall:

1. Vent the entire dryer exhaust through a carbon adsorption system or refrigerated condensation unit which meets the following conditions:

a. The dryer/condenser system must be closed to the atmosphere at all times except when articles are being loaded or unloaded through the door of the machine; and

Chairman Mandell then accepted several exhibits into the record submitted by Mr. Alves and granted party status.

Finally, Mr. Buford moved to adopt 17-2.100, with changes on page 6 through 7 of the hearing draft, as shown on attachment (3) of the handouts. Ms. Hill seconded and the motion passed.

✓ 3. Chapter 17-2, Air Corrective Amendments

Mr. Smallwood gave the presentation on Specific Source Emission Limiting Standards. He was assisted by Mr. John Reynolds. Mr. Smallwood said the purpose of the amendments is to comply with EPA standards. Specifically, he worked on three things: Creating new permitting exemptions; Clarifying rule provisions; and Updating compliance test methods.

Being no public comments or objections, Ms. Hill moved to adopt the amendments to Section 17-2.600, Mr. Buford seconded and the motion passed. Immediately following, Mr. Buford moved to pass all air corrective amendments, as recommended by the Department. Ms. Hill seconded and the motion passed.

Chairman Mandell expressed concern over the quality of air in Florida, particularly, in Tampa, and asked Mr. Smallwood to comment on this issue. Mr. Smallwood responded that mobile sources of air pollution are gaining attention.

VI. New Business

None

VII. Public Comment Period

Comments were received by Ms. Debra Swim, representing the Sierra Club. She discussed environmental groups being included in workshops on the Ash Rule.

VIII. Adjournment

Being no further business or comments, Mr. Buford moved to adjourn the meeting at 3:00 P.M., Ms. Hill seconded and the motion passed.

EXPLANATION OF CHANGE

DEPARTMENT OF ENVIRONMENTAL REGULATION

RULE NO.: Chapter 17-2

DOCKET NO.: 88-55R

RULE TITLE: Air Pollution

The changes to the corrective amendments were made as a result of last-minute requests by the concrete products industry and the Jacksonville local air program. The Environmental Regulation Commission approved the changes on April 26, 1989.

✓ Visible Emission Limits for Fossil Fuel Steam Generators - Rule 17-2.600(5)(a) and 17-2.600(6)(a)

The Jacksonville air program staff requested adding the word "either" to clarify that the permittee has an option of meeting the existing DER standard (40%) or the EPA standard (27%). To lock in the option, they requested language stating that the option selected must be specified in the permit. The option was included after the Florida Electric Power Coordinating Group expressed concern that older power plants would have great difficulty in complying with the 27% standard. The Joint Administrative Procedures Committee also required that wording be added to Rule 17-2.600(6)(a) to clarify the application of the rule.

Visible Emission Limits for Concrete Batching Plants - Rule 17-2.600(14)

The Florida Concrete and Products Association (FC&PA) asked the Division of Air Resources Management to delete the proposed 5 percent opacity limit for truck loadout operations (plant grounds) because FC&PA does not believe the industry can meet this limit. The unconfined particulate emissions rule (F.A.C. Rule 17-2.610(3) already applies to such loadout operations and will provide for adequate regulation until a more specific achievable standard can be developed.

RACT VOC Limits For Bulk Gasoline Terminals - Rule 17-2.650(1)(f)10.c.(i)

The Jacksonville air program staff recommended deleting the word "gasoline" so as not to preclude applicability of this provision to jet fuel, diesel fuel, or other non-gasoline fuels.

Fossil Fuel Steam Generators/Drycleaning Facilities - Rule

17-2.600(5)(a) and 17-2.600(12)(b)

The Joint Administrative Procedures Committee required that the word "may" be changed to "shall".

NOTICE OF CHANGE IN PROPOSED RULE

*Post-hearing
notice of change*

DEPARTMENT OF ENVIRONMENTAL REGULATION

RULE NO.: Chapter 17-2

DOCKET NO.: 88-55R

RULE TITLE: Air Pollution

The Department has made a change to the proposed rule which appeared in the Florida Administrative Weekly, Volume 15, Number 12, dated March 24, 1989, page 1263, so that the following section(s) will read as set forth below:

17-2.100 - Definitions.

(1) - (144) - No change.

(145) "PM₁₀"

(a) With respect to concentrations in the atmosphere, PM₁₀ means particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by a reference method based on 40 CFR Part 50, Appendix J, and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53.

(b) With respect to emissions, PM₁₀ means finely divided solid or liquid material with an aerodynamic diameter less than or equal to a nominal 10 micrometers emitted to the atmosphere as measured by an applicable reference method or by an equivalent or alternative method specified in ~~Title 40, Code of Federal Regulations~~ 40 CFR Part 60, Appendix A and adopted as part of this rule.

(146) - (216) - No change.

17-2.600 Specific Emission Limiting and Performance Standards.

(1) - (4) - No change.

(5) Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input.

(a) Existing Sources.

1. Visible emissions - 20 percent opacity except for either one six-minute period per hour during which opacity shall not exceed 27 percent, or one two-minute period per hour during which opacity shall not exceed 40 percent. The option selected shall be specified in the source's construction and operation permits.

Sources governed by this visible emission limit shall test for particulate emission compliance annually and as otherwise required by Rule 17-2.700, F.A.C.

Sources electing to test for particulate matter emission compliance quarterly shall be allowed visible emissions of 40 percent opacity. The results of such tests shall be submitted to the Department. Upon demonstration that the particulate standard has been regularly complied with, the Secretary, upon petition by the applicant, shall may reduce the frequency of particulate testing to no less than once annually.

2. - (b) - No change.

(6) Fossil Fuel Steam Generators With Less than 250 Million Btu per Hour Heat Input, New and Existing Sources.

The following standards apply to new and existing facilities unless otherwise specified by rule, or by order or permit issued by the Department prior to July 15, 1989.

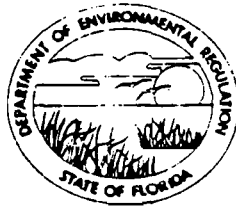
(a) Visible Emissions - 20 percent opacity except for either one six-minute period per hour during which opacity shall not exceed 27 percent, or one two-minute period per hour during which opacity shall not exceed 40 percent. The option selected shall be specified in the source's construction and operation permits.

A density of 30 percent opacity shall be allowed for Monsanto Textiles Company boiler units 2 and 4, Escambia County, while burning fuel oil in conjunction with waste material derived from waste streams previously discharged into underground wells.

(b) - (12)(a) - No change.

(b) ~~Any~~ New or existing (as of October 1, 1986) perchloroethylene dry cleaning facilities, facility located outside of ozone nonattainment areas and their respective metropolitan statistical areas, with total rated dryer capacity equal to or greater than 10 50 pounds of articles shall may be exempt from the requirements of Rule 17-2.600(12)(a), F.A.C., if the owner or operator demonstrates to the Department that the solvent mileage (pounds of articles cleansed per drum of solvent consumed) is equal to or greater than 20,000 or 15,000 pounds of articles cleansed per 52-gallon drum of perchloroethylene

TWIN TOWERS OFFICE BUILDING
2800 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

October 19, 1979

Mr. John White
Regional Administrator
U.S. Environmental Protection
Agency, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Attention: Air Program Branch

Dear Mr. White:

We are pleased to submit the attached revision to Florida's State Air Implementation Plan which includes revised visible emission limiting standards for fossil fuel steam generators in Florida; and, a particulate emission cap for soot blowing and load changing modes. This amendment is a regulatory revision to Sections 17-2.05(14), FAC (Excess Emissions) and 17-2.05(6), Table II, E., FAC (Fossil Fuel Steam Generators - Visible Emissions). The principal effect of this amendment is to allow Florida's electric utilities to continue operations during the current low sulfur oil shortage; and to formalize certain existing practices concerning soot blowing and load changing. This amendment is consistent in many respects (Visible and Excess Emissions) with my variance order for Florida Power and Light Company, which was issued on August 28, 1979. This revision was adopted by the Florida Environmental Regulation Commission at a duly noticed public hearing on August 22, 1979. I certify that the public requirements of 40 CFR 51.4 and 51.6, as well as applicable state regulations have been met. This includes 30 days advance notice of the Department's proposed action to your agency. Copies of the notice of public hearing and its publication are included in the attached document.

COMPARATIVE APPRAISAL OF REGULATIONS

On August 22, 1979, the Florida Environmental Regulation Commission adopted a revision to Chapter 17-2, FAC for fossil fuel steam generators. This revision contained three important changes in the regulation. The basic thrust of these changes were a modification of the excess emission standards and visible emission limits.

- ✓ 1. The visible emission limit for existing fossil fuel steam generators during steady state operations was increased from 20 percent to 40 percent for those units electing to test quarterly. The quarterly test must show compliance with the particulate mass emission limit of 0.1 #/MMBTU of heat input. In practice, the Department intends to limit the subject units to an opacity corresponding to the 0.1 #/MMBTU of heat input based on the opacity observed during steady state quarterly tests. However, the steady state opacity will never be allowed to exceed 40 percent. The Department does not intend to allow the opacity to exceed 20 percent if that level is not exceeded during the quarterly compliance test at the corresponding 0.1 #/MMBTU level. The specific opacity limit for each unit will be incorporated into the permit conditions for that unit. Verification of compliance with the appropriate opacity standards will be made during periodic field inspections.
2. Owners of fuel steam generators may petition the Secretary of the Department of Environmental Regulation for an increase in the 20 percent emission limit on a case-by-case basis. This provision is contingent upon all mass emission limits being met. The Secretary has the authority to limit these units to the corresponding opacity observed during the compliance test if it is greater than 20 percent. The limiting opacity declared by the Secretary will be incorporated into the permit or site certification conditions for the specific unit. Compliance with the visible emission limit will be enforced during periodic field inspections and subsequent compliance tests.
3. Section 17-2.05(14), FAC was amended to allow excess emissions from fossil fuel steam generators during periods of boiler cleaning and sharp load changes.

This modification of the rule permits fossil fuel steam generators to increase visible emissions to 60 percent for as long as 3 hours per day. In addition, the unit which have installed or committed to install continuous opacity monitors are allowed to exceed 60 percent opacity for up to 4 six minute periods during the allowed 3 hours per day. A particulate mass emission limitation cap of 0.3 #/MMBTU was allowed for periods of soot blowing and load changing. Compliance with the opacity limitations of Section 17-2.05(14), FAC will be monitored during random field inspections and quarterly compliance tests.

The Department will monitor compliance with the 0.3 #/MMBTU emission cap by requiring that one run of the test be conducted during soot blowing and load changing modes. The runs will then be weighted and arithmetically averaged ($0.875 \times \text{steady state avg.} + 0.125 \times \text{soot blowing and load changing}$). The result will be compared with an average of 0.13 #/MMBTU ($0.875 \times 0.1 \text{ #/MMBTU} + 0.125 \times 0.3 \text{ #/MMBTU}$). The average of the two steady state runs will be compared to the 0.1 #/MMBTU emission limitation for steady state conditions. The soot blowing run will be compared to the soot blowing standard of 0.3 #/MMBTU. An alternate approach, which will be accepted will be one complete test during steady state conditions and one complete test during soot blowing and load changing. The average of each test will be compared to the appropriate standard (0.1 #/MMBTU for steady state and 0.3 #/MMBTU for load changing and soot blowing).

Since Chapter 17-2, FAC contained no definition of load change, one was developed and added. A load change is defined as occurring when a fossil fuel steam generator, operating in the 10 to 100 percent capacity range, makes a load change equal to or greater than 10 percent of capacity at a rate of 0.5 percent per minute or more. An evaluation of several Florida units indicated that these load changes do not occur on a frequent basis.

This revision does not represent a change in particulate mass emission limits since Florida has never considered these conditions in its 0.1 #/MMBTU standard. However, soot blowing and load changing have always produced excess emission of up to 0.3 #/MMBTU of heat input.

*This is when we tried
to maintain the SIP
as a single document*

II. Revision to be Incorporated into SIP

- A. Narrative Pages MTTT - MEEEE
- B. Rule Pages 169 & 170A
(Replacing 169, 170, 171)
Pages 177A, 177B, 177C (to be incorporated
on page 177)

REVISION TO FLORIDA AIR IMPLEMENTATION
PLAN FOR VISIBLE AND EXCESS EMISSIONS
FROM FOSSIL FUEL STEAM GENERATORS

On August 22, 1979, the Florida Environmental Regulation Commission adopted an amendment to Chapter 17-2, FAC which contained three important revisions to the regulation. The overall thrust of these revisions were the modification of excess emission limitations and visible emission limits.

1. The visible emission limitation for existing fossil fuel steam generators during steady state operations was increased from 20 percent to 40 percent opacity for units which elect to perform a quarterly particulate source test. The quarterly particulate source test must demonstrate compliance with the current particulate mass emission limit of 0.1 #/MMBTU input. The Department plans to limit the subject units to an opacity corresponding to the 0.1 #/MMBTU of heat input based on the opacity observed during the steady state quarterly particulate test. However, the steady state opacity will never be allowed to exceed 40 percent. The Department does not intend to allow the opacity to exceed 20 percent if that level is not exceeded during the quarterly compliance test on the basis of the corresponding 0.1 #/MMBTU allowable emission rate. The specific opacity limit for each unit will be incorporated into the permit conditions for that unit. Verification of compliance with the appropriate opacity limit will be accomplished during periodic field inspections.
2. New fossil fuel steam generators may petition the Secretary of the Department of Environmental Regulation for an increase in the 20 percent visible emission limit on a case by case basis. This provision is contingent upon all mass emission limits being complied with. The Secretary has the authority to limit these units to the corresponding opacity observed during the compliance test, if it is greater than 20 percent. The limiting opacity determined by the Secretary will be incorporated into permit or site certification conditions for the specific unit. Compliance with the visible emission limits will be enforced during periodic field inspections and subsequent compliance tests.

3. Section 17-2.05(14), FAC has been amended to allow excess emissions, during periods of boiler cleaning and sharp load changes, from fossil fuel steam generators. This revision of the rule permits fossil fuel steam generators to increase visible emissions from 40 percent for 2 minutes in any hour to 60 percent for as long as 3 hours per day. In addition, the units which have installed or committed to install continuous opacity monitors are allowed to exceed 60 percent opacity for up to 4 six minute periods during the allowed 3 hours per day. A particulate mass emission limiting cap of 0.3 #/MMBTU was placed on the subject sources for periods of soot blowing and load changing. Compliance with the opacity limiting standards of Section 17-2.05(14), FAC will be monitored during random field inspections and quarterly compliance tests. The Department will monitor compliance with the 0.3 #/MMBTU emission cap by requiring that one run of the test be conducted during soot blowing and load changing modes. The runs will then be weighted and arithmetically averaged ($0.875 \times \text{steady state avg.} + 0.125 \times \text{soot blowing and load changing emission}$). The constants (0.875 and 0.125) can be modified to reflect the time actually spent load changing and soot blowing at the specific unit. The result will be compared with an average of 0.13 #/MMBTU ($0.875 \times 0.1 \text{ lb/MMBTU} + 0.125 \times 0.3 \text{ lb/MMBTU}$). The average of the two steady state runs will be compared to the 0.1 #/MMBTU and the soot blow-load change run compared to 0.3 #/MMBTU. An alternative approach which will be accepted will be one complete test during soot blowing and sharp load changing conditions. The alternate will be in addition to a complete steady state test. The average of each test will be compared to the appropriate standard (0.1 #/MMBTU for steady state and 0.3 #/MMBTU for load changing and soot blowing).

Since Chapter 17-2, FAC contained no definition of load change, one was developed and added. This definition was necessary so that only significant load changes would exempt fossil fuel steam generators from the 0.1 #/MMBTU standard. Analysis of actual load data enabled the Department and the power industry to concur on a definition. A load change is defined as occurring when a fossil fuel steam generator, operating in the 10 to 100 percent capacity range, makes a load change equal to or greater than 10 percent of capacity at a rate of 0.5 percent per minute or more.

The Department arrived at the emission cap of 0.3 #/MMBTU from source tests conducted by its stack team and Florida Power and Light Company's team. The maximum measured emission rate during a soot blowing operation was 0.281 #/MMBTU. The second maximum recorded was 0.206 #/MMBTU. The maximum particulate emission rate measured occurred during a load swing of 280 MW on a 400 MW generating unit. The particulate emission rate during this load swing was 0.132 #/MMBTU.

The Department calculated an estimated daily emission rate to evaluate the impact of the amendment against the 24-hour particulate standard and Prevention of Significant Deterioration increment. Since the affected units are limited to 0.1 #/MMBTU 88% of the time and to 0.3 #/MMBTU 12% of the time, the daily average emission rate will not be allowed to exceed 0.13 #/MMBTU. The data has been used to evaluate the impact of the amendment on ambient particulate concentrations using Environmental Science and Engineering's May 1979 Analysis For The Air Quality Impact Resulting From A Particulate Emission Rule Change For Fossil Fuel Steam Generators In Florida. The ambient particulate modeling in Environmental Science and Engineering's report has been varified by the Department of Environmental Regulation's staff.

Environmental Science and Engineering has analyzed the impact of major fossil fuel steam generating facilities on impacted areas at 0.1 #/MMBTU and 0.3 #/MMBTU. This analysis examined the impact of the power plants on designated nonattainment and Class I PSD areas.

The impact of the amendment to Chapter 17-2, FAC was examined in other areas of the state as well.

The maximum 24-hour incremental impact of power plants near Class I PSD areas has been found to be well below the 5 ug/m³ significance level in every case. These incremental impacts are as follows:

FP & L	Culter	1 ug/m ³	Everglades
FP & L	Turkey Point	2 ug/m ³	Everglades
TAL	A.B. Hopkins	1 ug/m ³	St. Marks
TAL	S.O. Purdom	4 ug/m ³	St. Marks

The maximum 24-hour incremental impact of power plants on areas which have not attained particulate standards have been carefully reviewed. Once again, the 5 ug/m³ significance level was not exceeded using the adopted control strategy. The impact of the control strategy on areas where particulate standards have not been attained are as follows:

FPC	Anclote	1 ug/m ³	Pasco
FP & L	Cutler	2 ug/m ³	Dade
FP & L	Lauderdale	1 ug/m ³	Dade
FP & L	Pt. Everglades	2 ug/m ³	Dade
FP & L	Turkey Point	1 ug/m ³	Dade
JEA	Kennedy	3 ug/m ³	Duval
JEA	Northside	1 ug/m ³	Duval
JEA	Southside	4 ug/m ³	Duval
TECO	Big Bend	1 ug/m ³	Hillsborough
TECO	Gannon	4 ug/m ³	Hillsborough
TECO	Hookers Point	2 ug/m ³	Hillsborough
FPC	Bartow	4 ug/m ³	Hillsborough
FPC	Higgins	1 ug/m ³	Hillsborough

The maximum 24-hour incremental impacts, the current impact, the background concentration, and the maximum 24-hour resulting concentration are shown in Table I. It is important to note that Class II PSD 24-hour increments and ambient air quality standards for particulate are not exceeded. Therefore, the Department of Environmental Regulation is certain that the attainment of ambient air quality standards for particulate will not be jeopardized.

Tables 2 and 3 include Department of Environmental Regulation and Florida Power and Light Company source test data collected during soot blowing and load changing modes. Emissions during the tests did not exceed the 0.3 #/MMBTU emission rate which was used as the cap.

The particulate emission cap of 0.3 #/MMBTU reflects a modification of Chapter 17-2 to accommodate an existing practice not recognized in the existing regulation. The standard of 0.1 #/MMBTU was only intended to apply during steady state conditions. Therefore, the cap does not represent an increase in the allowable particulate mass emission rate for these facilities.

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170A

More legible pre-hearing draft

Stationary Sources	Particulates	Visible emissions	Total reduced sulfur
D. KRAFT (SULFATE LIQUOR) PULP MILLS BLACK LIQUOR RECOVERY FURNACES			
(1) New plants	No greater than three pounds per each 3000 pounds of black liquor solids fed.		No greater than one ppm as H ₂ S on the dry basis or 0.01 pound per 3000 pounds black liquor solids fed, whichever is the more restrictive.
(2) Existing plants			17.5 ppm expressed as H ₂ S on a dry gas basis, or one-half (0.5) pounds per 3000 pounds of black liquor solids fed, whichever is more restrictive.
E. FOSSIL FUEL STEAM GENERATORS			
(1) Plants with more than 250 million BTU per hour heat input	0.1 pounds per million BTU heat input, maximum two hour average.	Density of which is equal to or greater than Number 1 of the Ringelmann Chart (20 percent opacity) except that a shade as dark as Number 2 of the Ringelmann Chart (40 percent opacity) shall be permissible for no more than 2 minutes in any hour. The preceding sentence notwithstanding, an owner or operator of a facility may request the Department to determine opacity of emissions from the facility during initial performance tests. Upon receipt from such owner or operator of the written report of the results of the performance tests, the Department will make a finding concerning compliance with opacity and other applicable standards. If the Department finds that a facility is in compliance with all applicable standards for which performance tests are conducted but during the time such performance tests are being conducted fails to meet any applicable opacity standard, it shall notify the owner or operator and advise him that he may petition the Secretary within 14 days of receipt of notification to make appropriate adjustment to the opacity standard for the facility.	
(a) New sources burning			
1. Liquid fuel			
2. Solid fuel			
3. Gaseous fuel		The Secretary will grant such a petition upon a demonstration by the owner or operator that the facility and associated air pollution control equipment was operated and maintained in a manner to minimize the opacity of emissions during the performance tests; that the performance tests were performed under the conditions established by the Department and that the facility and associated air pollution control equipment were incapable of being adjusted or operated to meet the applicable opacity standard.	
		The Secretary will establish an opacity standard for the facility meeting the above requirements at a level at which it will be able, as indicated by the performance and opacity tests, to meet the opacity standard at all times during which the source is meeting the mass or concentration emission standard. The Department shall take such steps as necessary to modify the permit or conditions of the certification of the source to reflect the new opacity limitation.	

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<p>(b) Existing sources</p> <p>1. Liquid fuel</p> <p>a. Duval County North of Neckacher Drive exclud- ing Jacksonville Electric Authority Northside Generating Stations.</p>		<p>Density of which is equal to or greater than Number 1 of the Ringelmann Chart (20 per- cent opacity) except that a shade as dark as Number 2 of the Ringelmann Chart (40 per- cent opacity) shall be per- missible for no more than 1 minute in any hour. Sources governed by this visible emis- sion limit shall test for particulate emission compliance annually and as otherwise re- quired by Section 17-2.08.</p> <p>Sources which elect to test for particulate emission compliance quarterly shall be allowed a density which is equal to or greater than Number 2 of the Ringelmann Chart (40 percent opacity). The results of such tests shall be submitted to the Department. Upon demonstration that the particulate standard has been regularly complied with, the Secretary, upon pe- tition by the applicant, may reduce the frequency of parti- culate testing to no less than once annually.</p>
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TABLE 11
EMISSION LIMITING STANDARDS

Stationary Sources	Particulates	Visible Emissions	Sulfur dioxide per million BTU heat input	Maximum Sulfur dioxide per million BTU heat input, Maximum 2 hour average
1. LIQUID FUEL STEAM GENERATORS (CONT.)				
1. Jacksonville Electric Authority's Northeast Generating Station	3.1 pounds per million BTU heat input, maximum two hour average	Density of which is equal to or greater than number 1 of the Lindemann Chart 120 percent opacity) except that a shade as dark as number 2 of the Lindemann Chart is permitted for not more than 2 minutes in any one hour. Sources complying with this visible emission limit shall test for particulate emission compliance annually and if the particulate emission is found to be in compliance, the source shall be exempt from the particulate emission test for the next two years.	1.78 pounds per million BTU heat input	1.78 pounds (Unit No. 1 only)
2. Jacksonville Electric Authority's Southeast and Kennedy Generating Stations			1.10 pounds per million BTU heat input	
3. All other sources in Duval County			1.65 pounds per million BTU heat input	
4. Hillsborough County including Tampa Electric Co. Gannon Station Units 1 through 4 and Hooker's Point Generating Station			1.1 pounds per million BTU heat input	
5. Escambia County, Gulf Power Co. First Steam Plant Units 1, 2 and 3		Source which elect to test for particulate emission compliance shall test for particulate emission compliance annually and if the particulate emission is found to be in compliance, the source shall be exempt from the particulate emission test for the next two years.	1.38 pounds per million BTU heat input	
6. Escambia County, Non-Santa Fe Station Units 1 through 6 in the aggregate		Source which elect to test for particulate emission compliance shall test for particulate emission compliance annually and if the particulate emission is found to be in compliance, the source shall be exempt from the particulate emission test for the next two years.	57.3 tons per any 24 hour period	
7. Manatee County, Florida Power and Light Company's Manatee Generating Station		Source which elect to test for particulate emission compliance shall test for particulate emission compliance annually and if the particulate emission is found to be in compliance, the source shall be exempt from the particulate emission test for the next two years.	1.1 pounds per million BTU heat input	3.10 pounds
8. Leon & Alachua County, City of Tallahassee's A. B. Hopkins and Pardon Generating Stations		Source which elect to test for particulate emission compliance shall test for particulate emission compliance annually and if the particulate emission is found to be in compliance, the source shall be exempt from the particulate emission test for the next two years.	1.87 pounds per million BTU heat input	10.10 pounds (Units No. 1 and 2 only)
2. SOLID FUEL				
1. Hillsborough County, Florida Power and Light Company's Butler Units No. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 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808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000			2.75 pounds per million BTU heat input	
2. Solid fuel				
1. Hillsborough County, Tampa Electric Co. Fanning Generating Station Units 3 and 4			2.4 pounds per million BTU heat input	
2. Hillsborough County, Tampa Electric Company's J. B. Bond Station, Units 1, 2 and 3			Units 1, 2 and 3 in total shall not emit more than 11.5 tons per hour of sulfur dioxide on a three hour average but in no case to exceed a two hour average emission of 4.1 pounds of sulfur dioxide per million BTU	3.70 pounds (Unit No. 1 only)
3. Escambia County, Gulf Power Co. First Steam Plant Units 4, 5, 6 and 7			3.30 pounds per million BTU heat input	
4. All other areas of the State			4.17 pounds per million BTU heat input	



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June 28, 2004

VIA FACSIMILE &
CERTIFIED MAIL NO.

70010360000207628134
Sandra Veazey
Air Resources Administrator
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Florida Department of Environmental Protection
160 Governmental Center
Pensacola, Florida 32502-5794

Re: Notification of Elevated Opacity Levels
Boiler Number 2 (EU-004)
Arvah B. Hopkins Generating Station
Facility ID No.: 0730003

Dear Ms. Veazey:

As you know, on Saturday, June 26, 2004, Boiler No. 2 at the Arvah B. Hopkins Generating Station recorded three six-minute values above the visible emissions limit contained in Title V Air Operation Permit No. 0730003-003-AV. The following serves to provide the Florida Department of Environmental Protection with written notification of the incident and to make a correction to the time the elevated opacity levels occurred from that originally reported to you. The elevated opacity levels were recorded by the Boiler No. 2 continuous opacity monitor as follows:

<u>Time and Duration</u>	<u>Six-Minute Average</u>
17:30 to 17:36	34.2%
17:36 to 17:42	41.8%
17:42 to 17:48	38.3%

An investigation into the cause of the elevated opacity levels was initiated immediately after their discovery. Although the investigation remains ongoing, the City of Tallahassee currently suspects the elevated opacity levels may have been caused by a malfunction resulting in a fuel to air ratio imbalance.

Please do not hesitate to contact me at (850) 891-5534, or Jennette Curtis, Environmental Services Administrator at (850) 891-8850, if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. McGarrah', with a long horizontal flourish extending to the right.

Robert E. McGarrah
Manager of Power Production
Responsible Official

cc: Jim Pennington, FDEP
Jonathan Holtom, FDEP
Gerald Neubauer, FDEP
Kevin Wailes, COT
Cynthia Barber, COT
Triveni Singh, COT
Jennette Curtis, COT
John K. Powell, COT

Date/Time
Local ID 1
Local ID 2

06-28-2004 02:52:51 p.m.
850 891 5162

Transmit Header Text
Local Name 1 CITY OF TALL. ELECTRIC DEPT.
Local Name 2

This document : Confirmed
(reduced sample and details below)
Document size : 8.5"x11"

2602 Jackson Bluff Rd.
Tallahassee, Florida 32304

City of Tallahassee
Your Own Utilities
Electric Utility

Phone: 850-891-5031
Fax: 850-891-5162

facsimile transmittal

To: <u>Sandra Veazy</u>	Fax:
From: <u>Bob McGurk</u>	Date: <u>6/28/04</u>
Re:	Pages: <u>3</u>
CC:	
<input type="checkbox"/> Urgent <input checked="" type="checkbox"/> For Review <input type="checkbox"/> Please Comment <input type="checkbox"/> Please Reply <input type="checkbox"/> Please Recycle	

Fax with Logo.dat

Total Pages Scanned : 3

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No.	Job	Remote Station	Start Time	Duration	Pages	Line	Mode	Job Type	Results
001	900	8505958096	02:51:56 p.m. 06-28-2004	00:00:53	3/3	1	EC	HS	CP14400

Abbreviations:

HS: Host send
HR: Host receive
WS: Waiting send

PL: Polled local
PR: Polled remote
MS: Mailbox save

MP: Mailbox print
CP: Completed
FA: Fail

TU: Terminated by user
TS: Terminated by system
RP: Report

G3: Group 3
EC: Error Correct

City of Tallahassee

Your Own UtilitiesSM



ENVIRONMENTAL RESOURCES FAX COVER SHEET

TO: <u>Trina Vielhauer</u>	FROM: <u>JENNIFER CURTIS</u> <u>LAURA Popovich x 8166</u>
COMPANY: <u>FL. D.E.P.</u>	DATE: <u>8/3/04</u>
FAX NUMBER: <u>922-6979</u>	TOTAL NO. OF PAGES INCLUDING COVER: <u>3</u>
PHONE NUMBER:	SENDER'S PHONE NUMBER: 850-891-8850
RE:	IF YOU HAVE A DISABILITY REQUIRING ACCOMMODATIONS CALL: FRS TDD- 1-800-955-8771

☒ URGENT ☒ FOR REVIEW ☐ PLEASE COMMENT ☒ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

*copies to
Jim P. Jk
Jonathan,
Pat Comer*

City of Tallahassee
Your Own Utilities



300 South Adams Street, Tallahassee, Florida 32301, (850) 891-4YOU (4968), talgov.com

August 3, 2004

Via Fax and Certified Mail No.:70010360000207628226

Trina Vielhauer
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, M.S. 5500
Tallahassee, Florida 32399

Re: Proposed Air Construction and Title V Permit Revision Language
Boiler Number 2 (EU-004)
Arvah B. Hopkins Generating Station
Title V Air Operation Permit No. 0730003-003-AV

Dear Ms. Vielhauer:

On behalf of the City of Tallahassee (City), I would like to thank you and your staff for meeting with representatives of the City on July 30, 2004, to further discuss the elevated opacity levels recorded at the Arvah B. Hopkins Generating Station Boiler Number 2. As requested, the City has prepared the following language to be submitted via an air construction permit and request for revision to the Hopkins Title V Air Operation Permit. This proposed language addresses the conditions that occur during the operation of Boiler Number 2 which are associated with very short duration increases in visible emissions.

The existing Title V Air Operation Permit states:

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.]

The City is proposing the following language be added:

In accordance with Rule 62-210.700(5), F.A.C., 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 shall such excess visible emissions and excess emissions resulting from malfunction exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.


Trina Vielhaur
August 3, 2004
Page 2 of 2

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.

The City would appreciate any feedback you and your staff could provide on the proposed permit revision language. The City is prepared to file an Air Construction Permit Application and corresponding Title V Air Operating Permit Revision Application upon receipt of confirmation that the Department supports this approach.

Thank you again for your assistance with this important matter. Please do not hesitate to contact me at (850) 891-5534 or Jennette Curtis, Environmental Services Administrator at (850) 891-8850, if you have any questions or require additional information.

Sincerely,



Robert E. McGarrah
Manager of Power Production

cc: Sandra Veazey, FDEP
Pat Comer, FDEP
Jim Pennington, FDEP
Johnathan Holtom, FDEP
Gerald Neubauer, FDEP
Triveni Singh, COT
Jennette Curtis, COT
John Powell, COT
Peter Cunningham, HGS