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**CERTIFIED MAIL RECEIPT**  
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Article Sent To:

Robert McGarrah

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Restricted Delivery Fee  
 (Endorsement Required)

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City of  
 Tallahassee

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Robert McGarrah

Street, Apt. No., or PO Box No.

2602 Jackson Bluff Rd.

City, State, ZIP+4

Tallahassee, FL 32304

PS Form 3800, July 1999

See Reverse for Instructions

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- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:

Mr. Robert McGarrah  
 Superintendent - Electric  
 Production Division  
 City of Tallahassee  
 2602 Jackson Bluff Road  
 Tallahassee, FL 32304

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly)

R. McGarrah

B. Date of Delivery

9-25-01

C. Signature

X Robert McGarrah

☒ Agent

☐ Addressee

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

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4. Restricted Delivery? (Extra Fee)

☐ Yes

2 Article  
 709

PS Form

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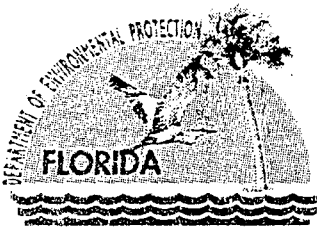
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Dept. of Environmental Protection  
Division of Air Resources Mgt.  
Bureau of Air Regulation, NSR  
2600 Blair Stone Rd., MS 550  
Tallahassee, FL 32399-2400

RECEIVED  
MAY 01 2001

BUREAU OF AIR REGULATION





Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

April 24, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert McGarrah  
Superintendent - Electric Production Division  
City of Tallahassee  
2602 Jackson Bluff Rd.  
Tallahassee, Florida 32304

Re: Proposed Burner Replacement Project  
Arvah B. Hopkins Generating Station  
Facility ID 0730003

Dear Mr. McGarrah:

The Department is in receipt of the your request for concurrence dated April 13, 2001 on the City of Tallahassee's determination that the subject project is not subject to New Source Review. The City has proposed that replacement of the 12 burners on Unit 2 boiler qualifies for an exemption as a pollution control project. Inasmuch as the submittal included a specific request for an expeditious review and written response within the next two weeks, the Department currently finds that the analysis and submittals are incomplete. In order to continue processing your request under this exemption, the Department will need the additional information below. Should your response to any of these items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application.

1. A copy of the guarantees and/or specifications will be required for the existing as well as the proposed burners. The Department understands that the existing burners are not considered to be low-NO<sub>x</sub> whereas the proposed burners are. Please confirm or clarify this information.
2. A summary of the estimated emission changes for each criteria pollutant. Each criteria pollutant emitted should be compared over the generating unit's load range as well as on an annual basis, as a result of the burner replacement. All assumptions should be clearly stated, as the Department must be able to quantify the net benefit to the environment.
3. A modeling analysis to evaluate ambient impacts for any criteria pollutant where emissions may increase as a result of the burner replacement.

We may include the EPA and the National Park Service within this formal review. Should we receive written comments, we will forward them to you when received and they will comprise part of this completeness review.

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please note that per Rule 62-4.055(1): "The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department."

If you have any questions, please call me or Michael P. Halpin, P.E. at 850/921-9519.

Sincerely,

A.A. Linero, P.E. Administrator  
New Source Review Section

cc: Carl Bauer, City of Tallahassee

"More Protection, Less Process"



CITY HALL  
300 S. ADAMS ST.  
TALLAHASSEE, FL  
32301-1731  
850/891-0010  
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Mayor  
STEVE MEISBURG  
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CHARLES E. BILLINGS  
Commissioner  
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Commissioner

ANITA R. FAVORS  
City Manager  
GARY HERNDON  
Interim City Treasurer-Clerk

JAMES R. ENGLISH  
City Attorney  
SAM M. MCCALL  
City Auditor

May 9, 2001

RECEIVED

MAY 10 2001

**CERTIFIED MAIL NO.: 7099 3400 0004 3663 3995**

BUREAU OF AIR REGULATION

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

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

Dear Mr. Linero:

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

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

*An All-America City*

Page 2  
Mr. Al Linero  
May 9, 2001

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

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

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

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

Yours truly,



Robert E. McGarrah, Superintendent  
Electric Production Division

lmh

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