

THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**RECEIVED**

JUL 18 2002

In the Matter of an  
Application for Permit by:

OGC No.: 02-0893

BUREAU OF AIR REGULATION

City of Tallahassee  
300 South Adams Street  
Tallahassee, FL 32301

Draft Air Construction Project No.: 1290001-005-AC  
Draft Title V Permit Revision No.: 1290001-006-AV  
Sam O. Purdom Generating Station  
Wakulla County, Florida

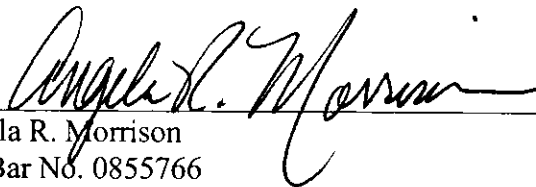
**NOTICE OF WITHDRAWAL OF REQUEST  
FOR EXTENSION OF TIME TO FILE PETITION FOR HEARING**

By and through undersigned counsel, the City of Tallahassee (City) hereby gives notice:

1. On June 24, 2002, the City requested, pursuant to Florida Administrative Code Rule 62-110.106(4), an Extension of Time, to and including July 24, 2002, in which to file a Petition for Administrative Proceedings in the above-styled matter.
2. On July 9, 2002, the Department of Environmental Protection (Department) issued an order granting the City's request for extension of time.
3. The City and the Department came to an agreement on the issues involved in the above-referenced permits. The agreement between the City and the Department is contained in the proposed revisions to the permit language, a copy of which is attached to this Notice (Exhibit A). This revised language will address the City's concerns with its above-mentioned draft permits and obviates the need for an enlargement of time. Therefore, the City hereby withdraws its Request for Extension, conditioned upon the Department's issuance of the revised proposed permit in accordance with the Department's agreement with the City.

Respectfully submitted this 15<sup>th</sup> day of July, 2002.

HOPPING GREEN & SAMS, P.A.



Angela R. Morrison  
Fla. Bar No. 0855766  
123 South Calhoun Street  
Tallahassee, FL 32301  
(850) 222-7500

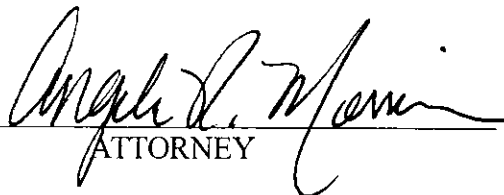
Attorneys for CITY OF TALLAHASSEE

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that an original and one copy of the foregoing has been furnished by hand-delivery to the Clerk of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399, and that a true and correct copy of the foregoing has been furnished to the following by U.S. Mail and/or hand delivery this 15<sup>th</sup> day of July, 2002:

Douglas Beason, Esq.  
Office of General Counsel  
Department of Environmental Protection  
3900 Commonwealth Blvd.  
Tallahassee, FL 32399

Jeff Koerner  
Division of Air Resources Management  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400



ATTORNEY

**From:** "Curtis, Jennette" <CurtisJ@talgov.com>  
**To:** "Angela Morrison (E-mail)" <morrisona@hgss.com>  
**Date:** 7/12/02 2:03PM  
**Subject:** FW: City of Tallahassee-Title V Revision/PSD Modification

Please find attached, the response from DEP concerning our requested changes to the above-referenced permits

-----Original Message-----

**From:** Koemer, Jeff [mailto:Jeff.Koemer@dep.state.fl.us]  
**Sent:** Tuesday, July 02, 2002 1:19 PM  
**To:** Curtis, Jennette  
**Subject:** RE: City of Tallahassee-Title V Revision/PSD Modification

Jennette,

I reviewed the requested changes and agree that these represent our previous discussion. I believe that the requests are minor in nature and represent corrections or clarifications. I will make these minor changes to the final air construction permit and the proposed Title V operation permit.

You also asked the following question: Is it acceptable to operate under the construction permit at the higher heat input rates and utilizing the auxiliary boiler, as requested, before we get the final Title V permit?

In accordance with Rule 62-4.210(3), F.A.C., the permit must allow a period of time to construct, operate, test, and apply for/receive an operation permit. Once the gas turbine satisfactorily demonstrates compliance at the higher heat input rate, I believe it would be acceptable to operate at the higher rate. Similarly, the revised condition for the auxiliary boiler does not require any performance testing. Noting that you have already started the process of obtaining the revision to the Title V air operation permit, I believe that you can implement these changes in accordance with the conditions of the federally enforceable air construction permits.

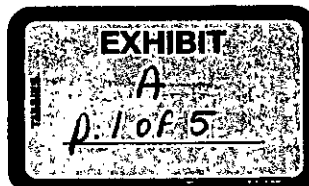
Thanks!

Jeff Koemer  
New Source Review Section  
850/921-9536

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**Message-ID:** <614E33D8AF10704AAB61E151813351C8012414D2@cotexchange3>  
**From:** "Curtis, Jennette" <CurtisJ@talgov.com>  
**To:** "Koemer, Jeff" <Jeff.Koemer@dep.state.fl.us>  
**Subject:** FW: City of Tallahassee-Title V Revision/PSD Modification  
**Date:** Mon, 1 Jul 2002 15:31:34 -0400  
**X-Mailer:** Internet Mail Service (5.5.2653.19)

Jeff, I had to re-send this e-mail. The problem was on my end. Let me know if this works for you.

-----Original Message-----



From: Curtis, Jennette  
Sent: Monday, July 01, 2002 3:21 PM  
To: Jeff Koener (E-mail)  
Cc: McGarrah, Rob; Bauer, Karl; King, Gordon  
Subject: City of Tallahassee-Title V Revision/PSD Modification

<<PSDTitleVKoener ResponseJuly0102.doc>>



Re: City of Tallahassee (City) - Sam O. Purdom Generating Station  
Draft Air Construction Permit – 1290001-005-AC  
Draft Title V Air Operation Permit – 1290001-006-AV

Dear Jeff:

As per our conference call on June 24, 2002 to discuss the above-mentioned draft permits for the Sam O. Purdom Generating Station, I am submitting the following language for your consideration and confirmation to change.

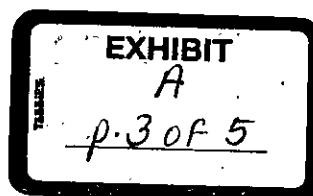
1. The City requests deletion of the final sentence of the first paragraph on page 4 of the Technical Evaluation and Preliminary Determination.

**First Paragraph, Page 4, Technical Evaluation and Preliminary Determination** – The analysis shows that the requested increase in heat input will not result in an impact greater than 1 ug/m<sup>3</sup> in the nearby St. Marks National Wilderness Area. Emissions of nitrogen oxides and sulfur dioxide will not increase due to the federally enforceable emissions caps; therefore, no analysis of these pollutants was required. ~~The Department approves the increase in heat input provided the permittee continues to tune the gas turbine in accordance with the manufacturer's specifications.~~

**As we discussed this is elsewhere in the permit and can be deleted from this section.**

2. To agree with other modifications being made to the existing permit, the City requests that PSD Condition D.3 and Title V Condition F.34 be modified to reference inlet compressor conditions and the permitted capacity defined pursuant to Rule 62-297.310(2) and Guidance document No. DARM-OGG-07.

**Title V Condition F.34 - Operating Rate During Testing.** Except for carbon monoxide emission testing, testing of emissions shall be conducted with each emissions unit operating at permitted capacity, which is defined as 95-100 percent of the maximum heat input rate allowed by the permit, corrected for the average ambient compressor inlet air temperature during the test (with 100 percent represented by a curve depicting heat input vs. ambient compressor inlet conditions). If it is impracticable to test at permitted capacity, the source may be tested at less than permitted capacity. In this case, subsequent operation is limited by adjusting the entire heat input vs. ambient compressor inlet temperature curve downward by an increment equal to the difference between the maximum permitted heat input (corrected for ambient compressor



inlet conditions) and 405110 percent of the value reached during the test until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity. Compliance test results shall be submitted to the Department's Northwest District office no later than 45 days after completion of the last test run.

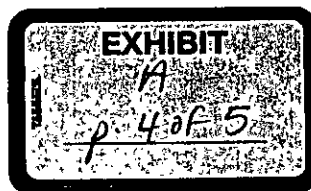
**PSD Condition D.3** – An initial test for CO, concurrent with the initial NOx test is required. The initial CO test results shall be the average of three valid one-hour test runs. The DEP's Northwest District office shall be notified, in writing, at least 30 days prior to the initial compliance tests and at least 15 days before annual compliance test(s). Testing of emissions shall be conducted with the combustion turbine operating at permitted capacity. Permitted capacity is defined as 9590-100 percent of the maximum heat input rate allowed by the permit, corrected for the average ambientcompressor inlet air temperature during the test (with 100 percent represented by a curve depicting heat input vs. ambientcompressor inlet temperature). If it is impracticable to test at permitted capacity, the source may be tested at less than permitted capacity. In this case, subsequent operation is limited by adjusting the entire heat input vs. ambientcompressor inlet temperature curve downward by an increment equal to the difference between the maximum permitted heat input (corrected for ambientcompressor inlet temperature) and 405110 percent of the value reached during the test until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity.

3. Condition F.23 should be modified to reference Unit -014.

**Title V Condition F.23 - Annual Tests Required.** Unit ~~-012~~-014 must be tested annually for visible emissions, and carbon monoxide in accordance with the requirements listed below.

4. Under Draft Title V Condition F.1. we agreed that the City would request that this language be deleted when we submit our Title V renewal permit. (The Title V renewal permit is being hand delivered to your offices today.)

Relative to Draft Title V Condition F.5, we are going to see if we can get the test completed in August so we will not be requesting any language changes.



I believe this represents what we discussed last week and concurs with what we agreed to submit for your consideration. If you concur with this language and are able to place this into the draft permits the City will then withdraw the Request for Extension of Time. To do so, I will just need an e-mail confirming the above.

Also, in looking at the time frames involved with the revision to Title V I would like to know if it would be acceptable to operate under the construction permit at the higher heat input rates and utilizing the aux. boiler, as requested, before we get the final Title V permit?

If you have any questions or need additional information, please do not hesitate to contact me at 891-8850.

Thank you again for your time and consideration of these very important permit requests.

Sincerely,

Jennette Curtis  
Director-Environmental Resources

