



CITY HALL  
300 S. ADAMS ST.  
TALLAHASSEE, FL  
32301-1731  
850/891-0010  
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SCOTT MADDOX  
Mayor  
JOHN PAUL BAILEY  
Mayor Pro Tem

CHARLES E. BILLINGS  
Commissioner  
DEBBIE LIGHTSEY  
Commissioner  
STEVE MEISBURG  
Commissioner

ANITA R. FAVORS  
City Manager  
ROBERT B. INZER  
City Treasurer-Clerk

JAMES R. ENGLISH  
City Attorney  
RICARDO FERNANDEZ  
City Auditor

May 7, 1998

**CERTIFIED MAIL**

Mr. Scott Sheplak, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**RECEIVED**

MAY 11 1998

BUREAU OF  
AIR REGULATION

**Re: Draft Title V Permit No.: 1290001-003-AV  
Sam O. Purdom Generating Station**

Dear Mr. Sheplak:

On May 4, 1998, the City of Tallahassee had a telephone conversation with Mr. Jonathan Holtom regarding the draft Title V permit for the Purdom Generating Station. In light of the recent issuance of a Final Order signed by Governor Chiles, we explained to Mr. Holtom that pursuant to F.S. 403.509(3) the Department has 30 days to issue and forward a proposed Title V permit to the EPA. Mr. Holtom indicated that he would review this statutory language and prepare the proposed permit as required. Mr. Holtom also indicated that he has not modified the draft permit since last fall and had been awaiting the Final Order before addressing and incorporating changes requested by the City, but understands that the City would like to review the changes made to the permit prior to submittal to the EPA.

The City would like to emphasize its interest in reviewing the changes incorporated into the draft permit prior to being forwarded to EPA as a proposed permit.

Thank you for your time and consideration of this matter.

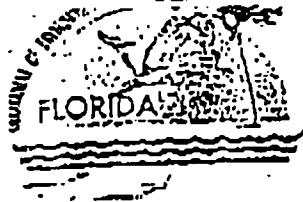
If you have any questions, please feel free to contact either myself at (904) 891-8850 or Karl Bauer at (904) 891-8851.

Sincerely,

Jennette Curtis  
Environmental Administrator

cc: Jonathan Holtom, FDEP  
Rob McGarrah, COT  
Gordon King, COT  
Karl Bauer, COT  
Gary Sams, HGSS  
Doug Fulle, FWEC

*faxed 5/7/98 8:20am JDC*  
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# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

## FAX TRANSMITTAL SHEET

TO: Mr. Karl Bayer, City of Tallahassee

DATE: 11/17/97 PHONE: <sup>Fax #</sup> 891-8277

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 10

FROM:



**SCOTT M. SHEPLAK, P.E.**  
ADMINISTRATOR  
TITLE V SECTION

STATE OF FLORIDA  
DEPT. OF ENVIRONMENTAL PROTECTION  
DIVISION OF AIR RESOURCES MANAGEMENT  
MAIL STATION 9550  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FL 32399-2400

PHONE: (850) 488-1344  
FAX: (850) 922-6979  
E-MAIL: SHEPLAK\_B@DEP.STATE.FL.US  
WEB SITE: <http://www.dep.state.fl.us>

COMMENTS:

Attachment A

PHONE: (850) 488-1344

FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call the above phone number.

*Sandy Knight*



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetheroll  
Secretary

-----, 1997

Ms. Yolanda Adams  
Operating Permits Section  
Air & Radiation Technology Branch, APTMD  
U.S. EPA, Region 4  
61 Forsyth Street  
Atlanta, GA 30303

Re: PROPOSED Title V Permit No.: 1290001-003-AV  
Sam O. Purdom Generating Station

Dear Ms. Adams:

One copy of the "PROPOSED PERMIT DETERMINATION" for the City of Tallahassee's amended Title V permit to include a new combustion turbine at the Sam O. Purdom Generating Station, located at 667 Port Leon Drive, St. Marks, Wakulla County, is enclosed.

Please submit any written comments on the PROPOSED Title V Air Operation Permit within 45 (forty five) days of the receipt of this letter to Scott M. Sheplak, P.E., at the above letterhead address.

If you have any other questions, please contact Jonathan Holtom at 850/488-1344.

Sincerely,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/h

Enclosures

Copy furnished to:  
Mr. Rob McGarran, City of Tallahassee.  
Mr. Karl Bauor, P.E., City of Tallahassee  
Mr. Darrell Graziani, P.E., Foster-Wheeler  
Mr. Ed Middleswart, DEP, Northwest District Office  
Mr. Gerry Neubauer, DEP, Northwest District Branch Office  
Ms. Carla E. Pierce, U.S. EPA, Region 4 (Internet E-mail Memorandum)

**PROPOSED PERMIT DETERMINATION**

PROPOSED Permit No.: 1290001-003-AV

**I. Public Notice.**

An "INTENT TO ISSUE AMENDED TITLE V AIR OPERATION PERMIT" to City of Tallahassee, Electric Utilities for the Sam O. Purdom Generating Station, located at 667 Port Leon Drive, St. Marks, Wakulla County, was clerked on October 10, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the Tallahassee Democrat on October 16, 1997. The DRAFT Title V Air Operation Permit was available for public inspection at the Northwest District office in Pensacola and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on October 20, 1997.

**II. Public Comment(s).**

Comments were received and the DRAFT Title V Operation Permit was changed. The comments were not considered significant enough to reissue the DRAFT Title V Permit and require another Public Notice. Comments were received from one respondent during the 30 (thirty) day public comment period. Listed below is each comment that was received and a corresponding response to each of the comments.

A. Letter from Mr. Robert E. McGarrah dated October 29, 1997, and received on April 25, 1997.

**General Comments**

**1. Comment:**

**Facility-wide Condition 9 --** The City assumes that the statement "...the effective date of the permit, defines day one" will not impact the calendar-based (weekly, monthly, yearly, etc.) recording, monitoring and reporting requirements other than establishing a point in time from which such calendar-based tasks become an enforceable requirement. If our assumption is incorrect, please let me know.

**Response:**

Your interpretation is correct.

As a result of this comment, no changes are required.

**2. Comment:**

**Specific Condition A.9 --** Since the Department has omitted language from Rule 62-296.405(1)(c)1, F.A.C., it would be appropriate to insert the statement "Annual fees associated with sulfur dioxide emissions from these emission units shall be determined by the fuel oil sulfur content limit and shall apply only to that portion of heat input associated with liquid fuel oil" to help clarify the fee requirement for natural gas and fuel oil use.

**Response:**

The annual emissions fee is regulated by Rule 62-213.205, F.A.C. It would not be appropriate to interject a desired interpretation of the fee rule into this condition that limits emissions.

As a result of this comment, no changes will be made.

**3. Comment:**

**Specific Conditions B.24f.(1) and g** – The rule citation under B.24f should not include 40 CFR 279.61, Subpart G - Standards for Used Oil Burners Who Burn Off-Specification Used Oil for Energy Recovery, since it is not applicable. The City will not burn off-specification used oil. The term "generated and" should be deleted as it will not provide the Department's Division of Air Resource Management with any air emission information beyond what is provided through recording of amounts of used oil burned. If the Department is not agreeable to providing this revision, the City would like to have a summary of the Department's current interpretation of this Specific Condition.

Additionally, the City requests that Condition B.24g be revised to "Reporting Requirements: If the owner or operator burns used oil during a calendar quarter, the owner or operator shall submit..."

**Response:**

Based on this comment and numerous others, changes have been made to the "used oil" condition. For consistency, those changes will be included in this permit. These changes include the deletion of the reference to 40 CFR 279.61 and a relaxation to annual reporting. The requirement to record and report the amount of used oil generated, along with the amount burned, will remain.

As a result of this comment, Condition B.24. is changed:

**From:**

**B.24. Used Oil.** Burning of on-specification used oil is allowed at this emissions unit in accordance with all other conditions of this permit and the following conditions:

- a. **On-specification Used Oil Emissions Limitations:** This emissions unit is permitted to burn on-specification used oil, which contains a PCB concentration of less than 50 ppm. On-specification used oil is defined as used oil that meets the specifications of 40 CFR 279 - Standards for the Management of Used Oil, listed below. "Off-specification" used oil shall not be burned. Used oil which fails to comply with any of these specification levels is considered "off-specification" used oil.

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
Arsonic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash point	100 degrees F minimum

- b. Quantity Limitation: This emissions unit is permitted to burn "on-specification" used oil that is generated by the City of Tallahassee in the production and distribution of electricity, not to exceed 10,000 gallons during any calendar year.
- c. PCB Limitation: Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement.
- d. Operational Requirements: On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.
- e. Testing Requirements: The owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs.

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

- f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department: [40 CFR 279.61 and 761.20(e)]
- (1) The gallons of on-specification used oil generated and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
  - (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
  - (3) Results of the analyses required above.
- g. Reporting Requirements: The owner or operator shall submit to the Northwest District office, within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

The owner or operator shall submit, with the Annual Operation Report form, the analytical results and the total amount of on-specification used oil burned during the previous calendar year.

[Rule 62-4.070(3) and 62-213.440, F.A.C., 40 CFR 279 and 40 CFR 761, unless otherwise noted.]

To:

**B.34. Used Oil**. Burning of on-specification used oil is allowed in this emissions unit in accordance with all other conditions of this permit and the following conditions:

- a. On-specification Used Oil Emissions Limitations: This emissions unit is permitted to burn on-specification used oil, which contains a PCB concentration of less than 50 ppm. On-specification used oil is defined as used oil that meets the specifications of 40 CFR 279 - Standards for the Management of Used Oil, listed below. "Off-specification" used oil shall not be burned. Used oil which fails to comply with any of these specification levels is considered "off-specification" used oil.

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash point	100 degrees F minimum

- b. Quantity Limitation: This emissions unit is permitted to burn "on-specification" used oil that is generated by the City of Tallahassee in the production and distribution of electricity, not to exceed 10,000 gallons during any calendar year.
- c. PCB Limitation: Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement.
- d. Operational Requirements: On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.
- e. Testing Requirements: For each batch of used oil to be burned, the owner or operator must be able to demonstrate that the used oil qualifies as on-specification used oil and that the PCB content is less than 50 ppm.

The requirements of this demonstration are governed by the following federal regulations:

Analysis of used oil fuel. A generator, transporter, processor/re-refiner, or burner may determine that used oil that is to be burned for energy recovery meets the fuel specifications of Sec. 279.11 by performing analyses or obtaining copies of analyses or other information documenting that the used oil fuel meets the specifications.

[40 CFR 279.72(a)]

Testing of used oil fuel. Used oil to be burned for energy recovery is presumed to contain quantifiable levels (2 ppm) of PCB unless the marketer obtains analyses (testing) or other information that the used oil fuel does not contain quantifiable levels of PCBs.

- (i) The person who first claims that a used oil fuel does not contain quantifiable level (2 ppm) PCB must obtain analyses or other information to support that claim.
- (ii) Testing to determine the PCB concentration in used oil may be conducted on individual samples, or in accordance with the testing procedures described in Sec. 761.60(g)(2). However, for purposes of this part, if any PCBs at a concentration of 50 ppm or greater have been added to the container or equipment, then the total container contents must be considered as having a PCB concentration of 50 ppm or greater for purposes of complying with the disposal requirements of this part.
- (iii) Other information documenting that the used oil fuel does not contain quantifiable levels (2 ppm) of PCBs may consist of either personal, special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the oil contains no detectable PCBs.

[40 CFR 761.20(e)(2)]

When testing is required, the owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs.

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

In addition to the above requirements, the owner or operator shall sample and analyze each batch of used oil to be burned for the sulfur content (by weight), density and heat content in accordance with approved test methods.

- f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
- (1) The gallons of on-specification used oil generated and burned each month.
  - (2) Results of the analyses required above.
  - (3) Other information, besides testing, used to make a claim that the used oil meets the requirements of on-specification used oil or that the used oil contains less than 50 ppm of PCBs.

[40 CFR 279.72(b), 40 CFR 279.74(b) and 40 CFR 761.20(e)]

- g. Reporting Requirements: The owner or operator shall submit, with the Annual Operation Report form, the analytical results and the total amount of on-specification used oil burned during the previous calendar year.

[Rules 62-4.070(3) and 62-213.440, F.A.C.; and, 40 CFR 279 and 40 CFR 761, unless otherwise noted.]

#### 4. Comment:

**Specific Condition F.5** – The phrase “at least 90 days prior to” should be replaced with the phrase “within 45 days of the” to properly mimic the related construction permit condition.

#### Response:

The requested change will be made

As a result of this comment, Condition F.5. is changed (in part):

#### From:

...These maximum heat input rates will vary depending upon ambient conditions and the combustion turbine characteristics. Manufacturer's curves or equations for correction to other ambient conditions shall have been provided to the Department of Environmental Protection (DEP) at least 90 days prior to initial compliance testing. These curves or equations shall be used to establish the maximum allowable heat inputs at other ambient conditions for compliance determinations. ...



# DRAFT

**To:**

...These maximum heat input rates will vary depending upon ambient conditions and the combustion turbine characteristics. Manufacturer's curves or equations for correction to other ambient conditions shall have been provided to the Department of Environmental Protection (DEP) within 45 days of completing the initial compliance testing. These curves or equations shall be used to establish the maximum allowable heat inputs at other ambient conditions for compliance determinations. ...

**5. Comment:**

**Specific Condition F.7** – It is the City's understanding that the preconstruction review process is not necessarily required for the burning of fuels other than natural gas and diesel. As such, the Condition should be revised to "...burning of other fuels may require review..."

**Response:**

The Department does not agree with this interpretation.

As a result of this comment, no changes will be made.

**6. Comment:**

**Specific Condition F.18** – The second to last sentence of the Condition should read "*Subject to EPA approval, the NO<sub>x</sub> CEMS will be used in lieu of the water/fuel monitoring system and fuel bound nitrogen monitoring, which are required for reporting excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG (1997 version).*" This will properly mimic the related construction permit condition as it currently exists.

**Response:**

Pending concurrence with the final version of the PSD permit, the requested changes will be made.

As a result of this comment, **Condition F.18.** may be changed (in part):

**From:**

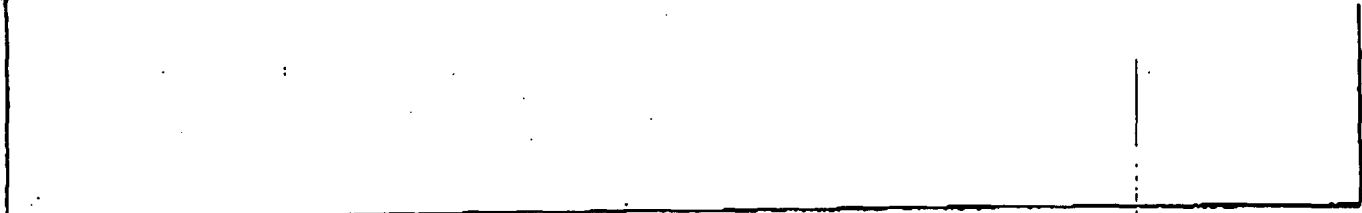
...*Subject to EPA approval, the NO<sub>x</sub> CEMS will be used in lieu of the water/fuel monitoring system and fuel bound nitrogen monitoring, which are required for reporting excess emissions in accordance with 40 CFR 60.334, Subpart GG (1997 version).* ...

**To:**

...*Subject to EPA approval, the NO<sub>x</sub> CEMS will be used in lieu of the water/fuel monitoring system and fuel bound nitrogen monitoring, which are required for reporting excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG (1997 version).* ...

**7. Comment:**

**Specific Condition F.42** – To provide consistency with the Draft PSD Permit conditions and allow for the proper use of the manufacturer's curves or equations that may include consideration of ambient humidity and/or barometric pressure, the terms "ambient air temperature" and "ambient temperature" should be revised to "ambient conditions."



c. Unconfined emissions associated with the limited on-site traffic shall be controlled by limiting vehicle speeds and unnecessary traffic within the plant grounds

[Rule 62-296.320(4)(c)2., F.A.C.; and, proposed by applicant in initial Title V permit application received June 14, 1996, and amended by comments received April 25, 1997.]”

**7. Comment:**

**Specific Condition F.42** – To provide consistency with the Draft PSD Permit conditions and allow for the proper use of the manufacturer’s curves or equations that may include consideration of ambient humidity and/or barometric pressure, the terms “ambient air temperature” and “ambient temperature” should be revised to “ambient conditions.”

**Response:**

The language in the Title V DRAFT permit appears to be consistent with the PSD permit. If this is incorrect, it will be changed to match the FINAL version of the PSD permit. Until the FINAL permit is issued, no change will be made.

**8. Comment:**

**Appendix TV-1** – The City understands, through the FCG, that the Department has agreed to insert the statement “Pursuant to Rule 62-213.430(6)(a), F.A.C., emissions units or activities which are added to a Title V source after issuance of the Title V permit shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify for exemption from permitting pursuant to Rule 62-213.430(6)(b), F.A.C.” in a future version of Appendix TV-1. Until such time, the City assumes that this rule applies to added emissions units at both the Sam O. Purdom and Arvah B. Hopkins generating stations. If this assumption is incorrect, please let us know immediately.

**Response:**

This assumption will be correct once the appropriate rule changes have been made.

As a result of this comment, no changes are required.

**9. Comment:**

**Summary Tables 1-1 and 2-1** – Permit condition references identified in the right hand column of these tables need to be revised as noted in the attached, to be consistent with the current version of the permit.

**Response:**

After final approval has been received from EPA regarding the proposed alternate conditions, the Title V permit will be updated and conditions will be deleted, with the remainder being renumbered. Until such time, changes to the DRAFT Table 1-1 and 2-1 are unnecessary.

**10. Comment:**

**Specific Conditions F.18. (Including Permitting Note inserted before F.18.), F.20., F.22., F.27., F.30., F.33., F.35., F.51., and F.58. – The City understands that the Department has received EPA approval for alternative monitoring procedures and schedules. This approval should be reflected in the above-referenced specific conditions by revising conditions F.18., F.20., F.27., and F.30. and deleting conditions F.22., F.26., F.33-F.35, F.51, and F.58.**

**Response:**

At such time that the PSD permit is finalized, the appropriate changes will be made to the Title V DRAFT permit. These changes will appear in the Title V PROPOSED permit.

As a result of this comment, no changes are required at this time.

**D. Documents on file with the permitting authority:**

-Letter received October 29, 1997, from Mr. Robert E. McGarrath.

**III. Conclusion.**

The enclosed PROPOSED Title V Air Operation Permit includes the aforementioned changes to the DRAFT Title V Air Operation Permit.

The permitting authority will issue the PROPOSED Permit No.: 1290001-001-AV, with the changes noted above.



CITY HALL  
300 S. ADAMS ST.  
TALLAHASSEE, FL  
32301-1731  
904/891-0010  
TDD 1-800/955-8771

SCOTT MADDOX  
Mayor  
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DEBBIE LIGHTSEY  
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RON WEAVER  
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City Manager  
ROBERT B. INZER  
City Treasurer-Clerk

JAMES R. ENGLISH  
City Attorney  
RICARDO FERNANDEZ  
City Auditor

HAND-DELIVERED

October 29, 1997

Mr. Scott Sheplak, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**RECEIVED**

OCT 29 1997

BUREAU OF  
AIR REGULATION

**RE: Draft Amendment to Title V Permit No.: 1290001-003-AV  
Sam O. Purdom Generating Station**

Dear Mr. Sheplak

On October 13, 1997, the City of Tallahassee received the Department of Environmental Protection's amended Draft Title V Permit for the Sam O. Purdom Generating Station. The City appreciates efforts the Bureau of Air Regulation has taken in issuing this draft permit amendment. In reviewing the draft permit amendment, the City has identified some minor revisions that would help clarify the underlying intent of specific conditions. The City's comments have been compiled in an attachment to this letter.

The City appreciates the Bureau's cooperation and assistance in this Title V permitting process, and we remain hopeful that all of the issues that are identified can be resolved within the next week. To ensure adequate time for this resolution, the City has requested an extension of time within which to submit a request for formal administrative proceedings or mediation (until November 17, 1997). In an effort to reach a timely resolution of the issues well in advance of this deadline, the City requests that you and your staff consider the comments being submitted with this letter and schedule a meeting for some time this week to discuss these outstanding issues.

We want to continue to work with the Department to ensure that the proposed permit is correct and gets issued in a timely manner, and we believe that the issues that have been identified can be resolved without the need for formal administrative

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proceedings. In fact, as stated above, a great majority of the comments in the attached document are quite minor and are provided primarily for clarification purposes. The City's more significant concerns include deleting the requirement to document and report used oil generation (Condition B.24.f) and the requirement for preconstruction review for alternative fuels regardless of resultant emissions.

Thank you for considering the City's comments and for your continued cooperation. We look forward to hearing from you soon. If you have any questions, please call Jennette Curtis at 891-8850. We will be calling to schedule a meeting within the next day or so.

Sincerely,



Robert E. McGarrah  
Production Superintendent  
Title V Responsible Official

cc: Jonathan Holtom, DEP  
Jeffrey Brown, DEP, OGC  
Chip Collette, DEP, OGC  
Jennette Curtis, COT  
Karl Bauer, COT  
Doug Fulle, FWE

10/30/97 cc: Scott Sheplak

City of Tallahassee  
Sam O. Purdom Generating Station  
Draft Title V Permit

1. **Facility-wide Condition 9** -- The City assumes that the statement "...the effective date of the permit, defines day one" will not impact the calendar-based (weekly, monthly, yearly, etc.) recording, monitoring and reporting requirements other than establishing a point in time from which such calendar-based tasks become an enforceable requirement. If our assumption is incorrect, please let me know.

2. **Specific Condition A.9** -- Since the Department has omitted language from Rule 62-296.405(1)(c)1, F.A.C., it would be appropriate to insert the statement "Annual fees associated with sulfur dioxide emissions from these emission units shall be determined by the fuel oil sulfur content limit and shall apply only to that portion of heat input associated with liquid fuel oil" to help clarify the fee requirement for natural gas and fuel oil use.

3. **Specific Conditions B.24f.(1) and g** - The rule citation under B.24f should not include 40 CFR 279.61, Subpart G - Standards for Used Oil Burners Who Burn Off-Specification Used Oil for Energy Recovery, since it is not applicable. The City will not burn off-specification used oil. The term "generated and" should be deleted as it will not provide the Department's Division of Air Resource Management with any air emission information beyond what is provided through recording of amounts of used oil burned. If the Department is not agreeable to providing this revision, the City would like to have a summary of the Department's current interpretation of this Specific Condition.

Additionally, the City requests that Condition B.24g be revised to "Reporting Requirements: If the owner or operator burns used oil during a calendar quarter, the owner or operator shall submit..."

4. **Specific Condition F.5** - The phrase "at least 90 days prior to" should be replaced with the phrase "within 45 days of the" to properly mimic the related construction permit condition.

5. **Specific Condition F.7** - It is the City's understanding that the preconstruction review process is not necessarily required for the burning of fuels other than natural gas and diesel. As such, the Condition should be revised to "...burning of other fuels may require review..."

6. **Specific Condition F.18** - The second to last sentence of the Condition should read "*Subject to EPA approval*, the NO<sub>x</sub> CEMS will be used in lieu of the water/fuel monitoring system and fuel bound nitrogen monitoring required for reporting excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG (1997 version)." This will properly mimic the related construction permit condition as it currently exists.

**7. Specific Condition F.42** - To provide consistency with the Draft PSD Permit conditions and allow for the proper use of the manufacturer's curves or equations that may include consideration of ambient humidity and/or barometric pressure, the terms "ambient air temperature" and "ambient temperature" should be revised to "ambient conditions."

**8. Appendix TV-1** - The City understands, through the FCG, that the Department has agreed to insert the statement "Pursuant to Rule 62-213.430(6)(a), F.A.C., emissions units or activities which are added to a Title V source after issuance of the Title V permit shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify for exemption from permitting pursuant to Rule 62-213.430(6)(b), F.A.C." in a future version of Appendix TV-1. Until such time, the City assumes that this rule applies to added emissions units at both the Sam O. Purdom and Arvah B. Hopkins generating stations. If this assumption is incorrect, please let us know immediately.

**9. Summary Tables 1-1 and 2-1** - Permit condition references identified in the right hand column of these tables need to be revised as noted in the attached, to be consistent with the current version of the permit.

**10. Specific Conditions F.18. (Including Permitting Note inserted before F.18.), F.20., F.22.-F.27., F.30., F.33.-F.35., F.51., and F.58.** - The City understands that the Department has received EPA approval for alternative monitoring procedures and schedules. This approval should be reflected in the above-referenced specific conditions by revising conditions F.18., F.20., F.27., and F.30. and deleting conditions F.22.-F.26., F.33-F.35, F.51, and F.58.

**Table 1-1, Summary of Air Pollutant Standards and Terms**

City of Tallahassee, Electric Utilities Department  
 Sam O. Purdom Generating Station

Permit No.: 1290001-003-AV  
 Facility ID No.: 1290001

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of the permit.

E. U. ID No.	Brief Description	Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See Permit Condition(s)
					Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
	Facility Wide Conditions***	SO <sub>2</sub>	(See Respective Sections)		N/A	N/A	80	N/A	80.0	PSD-FL-239, BACT	F.C. 13.
		NO <sub>x</sub>	(See Respective Sections)		N/A	N/A	467	N/A	467.0	PSD-FL-239, BACT	F.C. 15.
-005	Boiler #5 (300 MMBtu/hour)	VE	No. 6 - No. 2 F.O.	8760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5. & A.6.
-006	Boiler #6 (300 MMBtu/hour)	VE	Natural Gas	8760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5. & A.6.
	(22 MW Turbine-generator) (each unit)	PM	No. 6 - No. 2 F.O.	8760	0.1 lb/MMBtu	N/A	N/A	30.0	131.4	62-296.405(1)(b)	A.7.
			Natural Gas	8760	0.1 lb/MMBtu	N/A	N/A	30.0	131.4	62-296.405(1)(b)	A.7.
		PM - SB	No. 6 - No. 2 F.O.	3 hr/day	0.3 lb/MMBtu	N/A	N/A	90.0	164.3	62-210.700(3)	A.8.
		**	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	90.0	164.3	62-210.700(3)	A.8.
		SO <sub>2</sub>	No. 6 - No. 2 F.O.	8760	1.3 lb/MMBtu	N/A	N/A	390.0	80.0	Applicant Request	<del>A-10.A.7.</del>
			Natural Gas	8760	N/A	N/A	N/A	N/A	80.0	62-296.405(1)(c)	<del>A-10.A.7.</del>
		% Sulfur	No. 6 - No. 2 F.O.	8760	max. sulfur content 1.20 %, by wt.			390.0	1,708.2	Applicant Request	<del>A-11.A.10.</del>
-007	Boiler #7 (621 MMBtu/hour)	VE	No. 6 - No. 2 F.O.	8760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	B.5. & B.6.
	Acid Rain Phase II Unit  (44 MW Turbine-generator)		Natural Gas	8760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	B.5. & B.6.
		PM	No. 6 - No. 2 F.O.	8760	0.1 lb/MMBtu	N/A	N/A	62.1	272.0	62-296.405(1)(b)	B.7.
			Natural Gas	8760	0.1 lb/MMBtu	N/A	N/A	62.1	272.0	62-296.405(1)(b)	B.7.
		PM - SB	No. 6 - No. 2 F.O.	3 hr/day	0.3 lb/MMBtu	N/A	N/A	186.3	340.0	62-210.700(3)	B.8.
		**	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	186.3	340.0	62-210.700(3)	B.8.
		SO <sub>2</sub>	No. 6 - No. 2 F.O.	8760	1.87 lb/MMBtu	N/A	N/A	1,161.3	80 (1)	62-296.405(1)(c)1.h	B.9.
		Natural Gas	8760	N/A	N/A	N/A	N/A	80.0	62-296.405(1)(c)	B.9.	
		% Sulfur	No. 6 - No. 2 F.O.	8760	max. sulfur content 1.70%, by wt.			1,161.3	80.0	Applicant Request	B.10.
-008	Combustion Turbine No. 1 (228 MMBtu/hour)	VE	No. 2 F.O.	6993	Less than 20%	N/A	N/A	N/A	N/A	62-296.320(4)(b)	D.5.
			Natural Gas	6993	Less than 20%	N/A	N/A	N/A	N/A	62-296.320(4)(b)	D.5.
-009	Combustion Turbine No. 2 (228 MMBtu/hour)	SO <sub>2</sub>	No. 2 F.O.	6993	0.4% sulfur	N/A	N/A	97.4	80.0	AO65-242827	D.6.
			Natural Gas	6993	N/A	N/A	N/A	N/A	80.0	N/A	N/A
-011	Auxiliary Boiler	VE	Natural Gas	2000	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.406(1)	E.6.
		PM	Natural Gas	2000	N/A	N/A	N/A	N/A	N/A	62-296.406(2)	E-8. & E.7.
		SO <sub>2</sub>	Natural Gas	2000	N/A	N/A	N/A	N/A	80.0	62-296.406(3)	E-9. & E.8.



**Table 1-1, Summary of Air Pollutant Standards and Terms**

City of Tallahassee, Electric Utilities Department  
 Sam O. Purdom Generating Station

Permit No.: 1290001-003-AV  
 Facility ID No.: 1290001

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of the permit.

E. U. ID No.	Brief Description	Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See Permit Condition(s)
					Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
-012	Combustion Turbine #8 (1,467.7 MMBtu/hr - N.G.) (1,659.5 MMBtu/hr - F.O.)	VE	No. 2 F.O.	8760	10%	N/A	N/A	N/A	N/A	BACT	-F-8, F-9
			Natural Gas	8760	10%	N/A	N/A	N/A	N/A	BACT	-F-8, F-9
	Acid Rain Phase II Unit	PM/ PM <sub>10</sub>	No. 2 F.O.	8760	max. sulfur content 0.05%, by wt.			N/A	N/A	BACT	N/A
			Natural Gas	8760	Good Combustion			N/A	N/A	BACT	N/A
		SO <sub>2</sub>	No. 2 F.O.	8760	max. sulfur content 0.05%, by wt.			N/A	80.0	BACT	-F-9, F-10
			Natural Gas	8760	N/A	N/A	N/A	N/A	80.0	BACT	N/A
		NO <sub>x</sub>	No. 2 F.O.	8760	42 ppmvd @ 15 % O <sub>2</sub>			N/A	467.0	BACT	-F-11, F-12
			Natural Gas	8760	12 ppmvd @ 15 % O <sub>2</sub>			N/A	467.0	BACT	-F-10, F-11
		CO	No. 2 F.O.	8760	90 ppmvd			N/A	193.0	BACT	F-13, F-14
			Natural Gas	8760	25 ppmvd			N/A	193.0	BACT	-F-12, F-13

**Notes:**

\* The "Equivalent Emissions" listed are for informational purposes.

\*\* PM - SB refers to "soot blowing" and "load change".

\*\*\* Facility-wide cap is incorporated as a permit condition during the first calendar year following the initial compliance testing of Unit 8

**Table 2-1, Summary of Compliance Requirements**

City of Tallahassee, Electric Utilities  
 Sam O. Purdom Generating Station

Permit No.: 1290001-003-AV  
 Facility ID No.: 1290001

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E. U. ID No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing	Frequency	Min. Compliance		See Permit Condition(s)
					Time Frequency	Base Date <sup>2</sup>	Test Duration	CMS <sup>1</sup>	
	Facility Wide Conditions	SO <sub>2</sub>	No. 2 F.O.	(See Respective Sections)				Yes	Facility Condition 14
		NO <sub>x</sub>	Natural Gas	(See Respective Sections)				Yes	Facility Condition 16
-005	Boiler No. 5	VE	No. 6 - No. 2 F.O.	DEP method 9	Annually <sup>3</sup>	7/1 - 9/30	60 Minutes	No	C.5., C.6., C.11., C.13., C.16.
-006	Boiler No. 6		Natural Gas	DEP method 9	N/A	7/1 - 9/30	60 Minutes	No	
		PM	No. 6 - No. 2 F.O.	17, 5, 5B or 5F	Annually <sup>3</sup>	7/1 - 9/30	1 Hour	No	C.7., C.10. - 15., C.17.
			Natural Gas	17, 5, 5B or 5F	Annually <sup>3</sup>	7/1 - 9/30	1 Hour	No	
		SO <sub>2</sub>	No. 6 - No. 2 F.O.	Fuel Sampling & Analysis Provided by Vendor				No	C.8. & C.9.
-007	Boiler No. 7 (Phase II, Acid Rain)	VE	No. 6 - No. 2 F.O.	DEP method 9	Annually <sup>3</sup>	7/1 - 9/30	60 Minutes	No	C.5., C.6., C.11., C.13., C.16.
			Natural Gas	DEP method 9	N/A	7/1 - 9/30	60 Minutes	No	
		PM	No. 6 - No. 2 F.O.	17, 5, 5B or 5F	Annually <sup>3</sup>	7/1 - 9/30	1 Hour	No	C.7., C.10. - 15., C.17.
			Natural Gas	17, 5, 5B or 5F	Annually <sup>3</sup>	7/1 - 9/30	1 Hour	No	
		SO <sub>2</sub>	No. 6 - No. 2 F.O.	Fuel Sampling & Analysis Provided by Vendor and per Acid Rain Phase II Commitment				No	C.8. & C.9. and Acid Rain Part
-008	Combustion Turbine No. 1	VE	No. 2 F.O.	EPA Method 9	Annually <sup>4</sup>	7/1 - 9/30	30 Minutes	No	D.13. - D.16.
-009	Combustion Turbine No. 2		Natural Gas	EPA Method 9	Annually <sup>4</sup>	7/1 - 9/30	30 Minutes	No	
		SO <sub>2</sub>	No. 2 F.O.	Fuel Sampling & Analysis Provided by Vendor				No	D.9. & D.12.
-011	Auxiliary Boiler	VE	Natural Gas	EPA Method 9	Renewal		60 Minutes	No	<del>E-15., E-19., E-13., E-17.</del>
		PM	Natural Gas	N/A	N/A	N/A	N/A	No	N/A
		SO <sub>2</sub>	Natural Gas	N/A	N/A	N/A	N/A	No	N/A
-012	Combustion Turbine #8 (1,467.7 MMBtu/hr - N.G.)	VE	No. 2 F.O.	EPA Method 9	Annually <sup>3</sup>	7/1 - 9/30	60 Minutes	No	<del>F-28., 29., 39., 40., 44., 46-48.</del>
	(1,659.5 MMBtu/hr - F.O.)		Natural Gas	EPA Method 9	Annually <sup>3</sup>	7/1 - 9/30	60 Minutes	No	<del>F-27., 28., 37., 38., 42., 44., 46.</del>
	Acid Rain Phase II Unit	PM/PM <sub>10</sub>	No. 2 F.O.	Max. sulfur content 0.05%, by wt.				No	-F-30-
			Natural Gas	Good Combustion Practices				No	F-29.
		SO <sub>2</sub>	No. 2 F.O.	< 0.05% S., by wt.	Annually <sup>3</sup>	7/1 - 9/30	1 - hr.	Yes	<del>F-28., 30., 34., 36.-47.</del>
			Natural Gas	Good Combustion	Annually <sup>3</sup>	7/1 - 9/30	1 - hr.	No	<del>F-27., 29., 32., 34.-45.</del>
		NO <sub>x</sub>	No. 2 F.O.	EPA Method 20	Initial	7/1 - 9/30	1 - hr.	Yes	F-28., 32.-36., 38.-47.
			Natural Gas	EPA Method 20	Initial	7/1 - 9/30	1 - hr.	Yes	<del>F-27., 31.-34., 36.-45.</del>
		CO	No. 2 F.O.	EPA Method 10	Annually	7/1 - 9/30	1 - hr.	No	F-28., 31., 39.-47.
			Natural Gas	EPA Method 10	Annually	7/1 - 9/30	1 - hr.	No	<del>F-27., 30., 37.-45.</del>

**Notes:**

<sup>1</sup> CMS [=] continuous monitoring system.

<sup>2</sup> Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

<sup>3</sup> Test not required in years that fuel oil is fired less than 400 hours.

<sup>4</sup> If a combustion turbine is operated less than 400 hours per year, test is only required once every 5 years, during the year prior to permit renewal.

<sup>5</sup> Facility-wide caps begin the year following initial compliance testing of Unit 8.