

ELECTRIC OPERATIONS 2602 JACKSON BLUFF RD. TALLAHASSEE, FL 32304 850/891-5001 OFFICE 850/891-5162 FAX talgov.com

SCOTT MADDOX Mayor STEVE MEISBURG Mayor Pro Tem JOHN PAUL BAILEY Commissioner CHARLES E. BILLINGS Commissioner DEBBIE LIGHTSEY ANITA R. FAVORS City Manager GARY HERNDON Interim City Treasurer-Clerk JAMES R. ENGLISH City Attorney SAM M. McCALL City Auditor

February 28, 2002

### HAND DELIVERY

Mr. Jeffrey Koerner, PE Bureau of Air Regulation Florida Department of Environmental Protection 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Mail Station 5505 RECEIVED

FEB 27 2002

BUREAU OF AIR REGULATION

Re: Permit Revision Request

Unit 8 Combined Cycle Combustion Turbine and Auxiliary Boiler Permits PSD-FL-239, 1290001-002-AC, and 1290001-003-AV Site Certification PA 97-35 Sam O. Purdom Generating Station

Dear Mr. Koerner:

The City has received FDEP's request for additional information. At this time, the City is submitting responses to items 1, 4, 5 and 7 of the request, including a professional engineer's certification of the information contained herein (see Attachment A). In addition, the City is requesting an additional 30-day period to allow for response to the remaining three items.

In response to Item No. 1, the City understands the 30-day comment period that is required for the modification to the construction permit. However, the City would like to clarify that the 8.5 percent heat input increase, while firing natural gas, is the resultant increase at ISO conditions and is based on a 4 percent increase from the current permit limit (1467.7 mmBtu/hr LHV at 95°F, 60%RH,and 14.7 psi). This increase is related to the unit achieving a higher electrical output than originally guaranteed and variations in operational characteristics over time. The increase in maximum heat input rate for fuel oil combustion was less. But, similarly, 4 percent of the requested increase from the current permit limit (1659.5 mmBtu/hr at 95°F, 60%RH, and 14.7 psi) is related to the electric output and variations over time, and the balance of the increase is related to adjustments to ISO conditions.

In response to Item No. 4, initial performance testing, as required pursuant to 40 CFR 60, was conducted at base load on September 15, 2000, while firing natural gas, and on July 4, 2001, while firing No. 2 fuel oil. The heat input rate achieved during the three test runs conducted on September 15, 2000, averaged 1553.4 mmBtu/hr HHV at an inlet temperature of 86°F, which is approximately 12.5 percent less than the requested

maximum heat input rate. Likewise, the heat input rate achieved during the three test runs conducted on July 4, 2001, averaged 1793.3 mmBtu/hr HHV at an inlet temperature of 78°F, which is approximately 6.9 percent less than the requested maximum heat input rate. Test data and related performance curve information is provided in Attachment B. The City recognizes that additional emission testing will be required to permit firing natural gas at the requested maximum heat input rate. However, as testing has already been completed for natural gas firing at 1553.4 mmBtu/hr HHV at 86°F, the City prefers to limit operation "by adjusting the entire heat input vs. combustor inlet temperature curve downward by an increment equal to the difference between the maximum permitted heat input (corrected for compressor inlet conditions) and 110 percent of the value reached during the test until a new test is conducted."

In response to Item No. 5, the City has compiled continuous emissions monitoring system data that represents the linked events that caused prolonged periods of high oxides of nitrogen readings. The compiled data is presented in Attachment B. A description of the linked events is provided to the right of each day's data. Please note, in order to reduce the length of Attachment C, only ten days of data are presented.

In response to Item No. 7, the City has rendered units 5 and 6 permanently inoperable. Removing reference to these units in the Title V permit would be appropriate.

If you have any questions regarding the additional information provided above, please feel free to contact either myself at (850) 891-5534 or Ms. Jennette Curtis at (850) 891-8850.

Yours truly,

R. E. McGarrah, Manager Electric Production Division Responsible Official

#### Attachments

cc: Hamilton Oven, DEP
Sandra Veazey, DEP
Al Linero, DEP
Scott Sheplak, DEP
Greg Worley, EPA
John Bunyak, NPS
G. King, COT
B. Cowart, COT
J. Curtis, COT
K. Bauer, COT

#### ATTACHMENT A

## 4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein\*, that:

- (1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and
- (2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [X] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

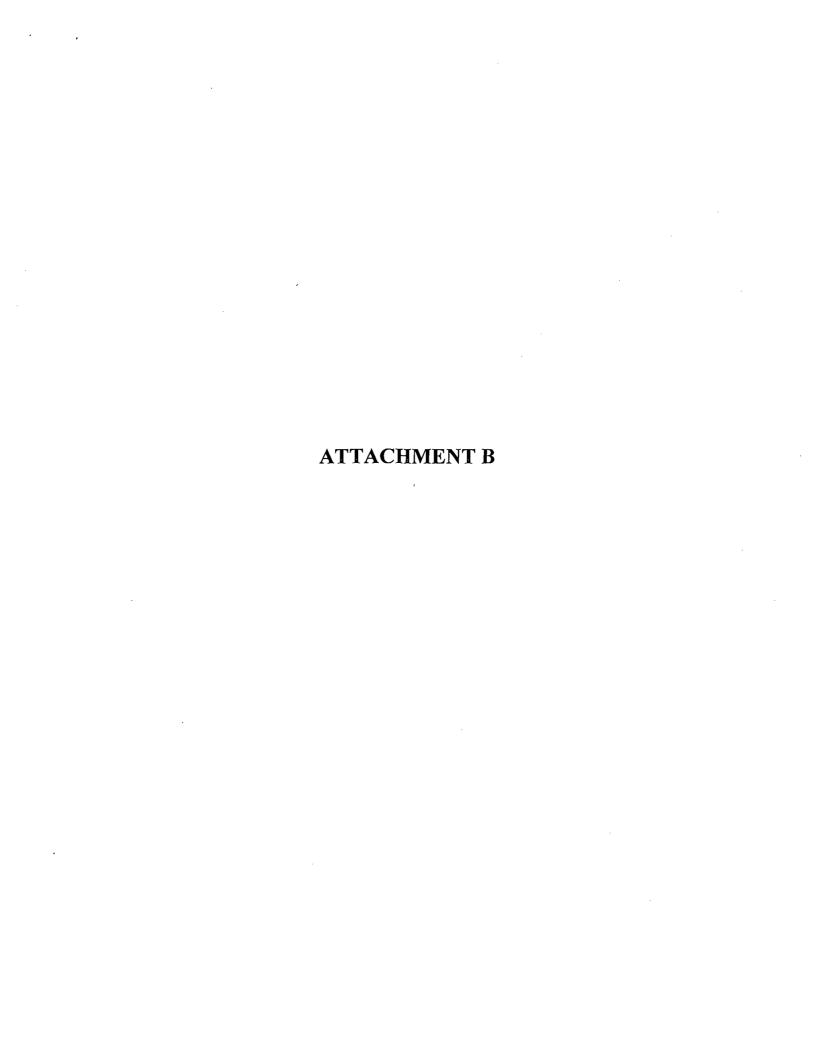
If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature Date

\* Attach any exception to certification statement.

DEP Form No. 62-210.900(1) - Form

Effective: 3/21/96



# INITIAL PERFORMANCE TEST DATA NATURAL GAS

Table 2. Emission Summary
Combustion Turbine Unit 8 - Gas Fired - Full Load
City of Tallahassee Sam O. Purdom Plant
Tallahassee, Florida
September 15, 2000

											CT		
Run Number	Time	Oxygen %	ppm	ppm 15% O2	Ox Emission ppm Ø ISO	lbs/hr	lbs/MMBTU	ppm	O Emissio	ins Ibs/MMBTU	Gas Flow 100scf/hr	Heat Input MMBTUH HHV	<u>SO2</u> lbs/hr
Full Load	-												
1	1303-1403	13.61	10.84	8.77	10.55	50.70	0.032	0.88	2.52	0.002	15169	1568.9	0.900
2	1418-1518	13.70	10.83	8.87	11.15	50.71	0.033	0.86	2.45	0.002	15005	1552.0	0.890
3	1529-1629	13.63	10.58	8.59	10.92	48.71	0.032	0.80	2.24	0.001	14882	1539.3	0.880
Average		13.65	10.75	8.74	10.87	50.04	0.032	0.85	2.40	0.002	15019	1553.4	0.890

Natural Gas Fd-Factor = 8710 MMBTU/dscf

 $lbs/hr = ppm(2.595 \times 10^{E-9})MW (20.9/20.9-\%02)(Fd)(Heat Input HHV)$ 

MW NOx = 46 lbs/lb-mole

MW CO = 28 lbs/lb-mole

Allowable Emissions

NOx =12 ppmvd @ 15%O2

CO = 25 ppmvd

Heat Input HHV = (gas flow)(gross calorific value)/10E06

September 15, 2000.
Purdom Unit 8 Combustion Turbine compressor inlet temperature during stack testing.

TIME	TEMP °F
13:00	86
13:05	86
13:10	86
13:15	86
13:20	87
13:25	87
13:30	87
13:35	87
13:40	87
13:45	- 87
13:50	87
13:55	86
14:00	87
14:05	87
14:10	86
14:15	86
14:20	85
14:25	85
14:30	85
14:35	85
14:40	85
14:45	85
14:50	86
14:55	85
15:00	85

TIME	TEMP °F
15:05	86
15:10	86
15:15	85
15:20	85
15:25	86
15:30	85
15:35	86
15:40	86
15:45	87
15:50	86
15:55	86
16:00	86
16:05	86
16:10	85
16:15	86
16:20	85
16:25	85
16:30	85
16:35	85
16:40	85
16:45	85
16:50	85
16:55	85
17:00	86

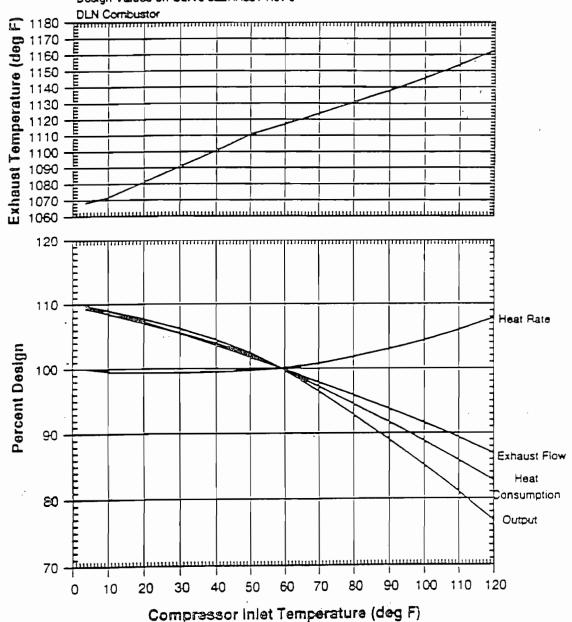
## GENERAL ELECTRIC MODEL PG7241(FA) GAS TURBINE

Effect of Compressor Inlet Temperature on Output, Heat Rate, Heat Consumption, Exhaust Flow

And Exhaust Temperature at Baseload

Fuel: Methane

Design Values on Curve 522HA851 Rev 0



F.Brooks 1/24/97 522HA852

Rey - 0

Performance Curves

Page:

## INITIAL PERFORMANCE TEST DATA No. 2 FUEL OIL

Table 1. Emission Summary
Combustion Turbine Unit 8 - Oil Fired
City of Tallahassee Sam O. Purdom Plant
Tallahassee, Florida
July 3 and 4, 2001

											СТ		
Run	Time	Oxygen		NO	x Emissions				CO Emission		Oil Flow	Heat Input	<u>SO2</u>
Number		%	ppm	ppm 15% O2	ppni @ ISO	lbs/hr	ibs/MMBTU	ppm	lbs/hr	Ibs/MMBTU	lbs/hr	MMBTUH VHH	lbs/hr
Low Load	- 60 MW Ru	ıns 1 & 2 <u>(7</u>	//3/01), <u>65</u>	MW Run 3	(7/4/01)								
1	0816-0851	13.67	46.88	38.26	48.67	136.45	0.149	1.26	2.23	0.0024	47261	917.8	37.81
2	0905-0948	13.69	48.48	39.67	46.88	141.24	0.154	1.07	1.90	0.0021	47176	916.2	37.74
3	0812-0848	13.42	43.30	34.15	40.35	128.75	0.133	1.22	2.21	0.0023	49953	970.1	39.96
Average		13.59	46.22	37.36	45.30	135.48	0.145	1.18	<b>2</b> .1 <b>1</b>	0.0023	48130	934.7	38.50
Base Loa	d - 168 MW	(7/4/01)											
1	0929-1029	12.42	50.60	35.21	44.16	245.79	0.137	1.44	4.26	0.0024	92514	1796.6	74.01
2	1054-1154	12.49	51.85	36. <b>3</b> 8	43.92	<b>25</b> 2. <b>90</b>	0.141	1.38	4.10	0.0023	92129	1789.2	73.70
3	1215-1315	12.44	52.02	36.28	43.81	252.94	0.141	1.04	3.08	0.0017	92386	1794.1	73.91
Average		12.45	51.49	35.95	43.96	250,54	0.140	1.29	3.81	0.0021	92343	1793.3	73.87

Fuel Oil F Factor = 9190 dscf/MMBTU

 $lbs/hr = ppm(2.595 \times 10^{E-9})MW (20.9/20.9-\%O2)(Fd)(Heat Input HHV)$ 

MW NOx = 46 lbs/lb-mole

MW CO = 28 lbs/lb-mole

Heat Input HHV = (oil flow)(gross calorific value)/10E06

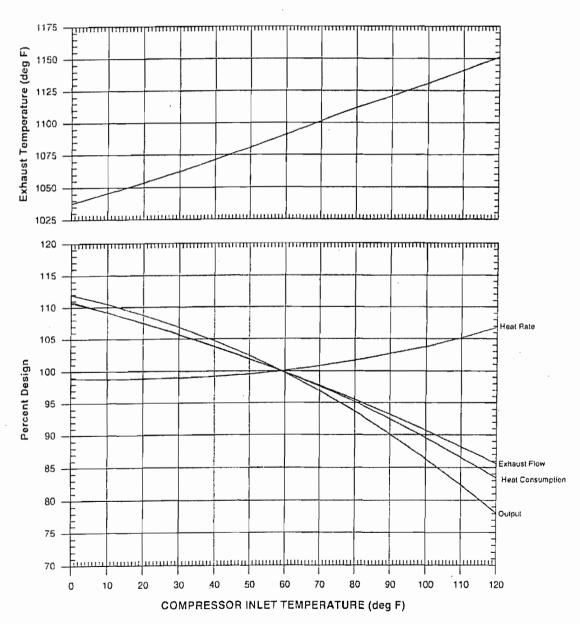
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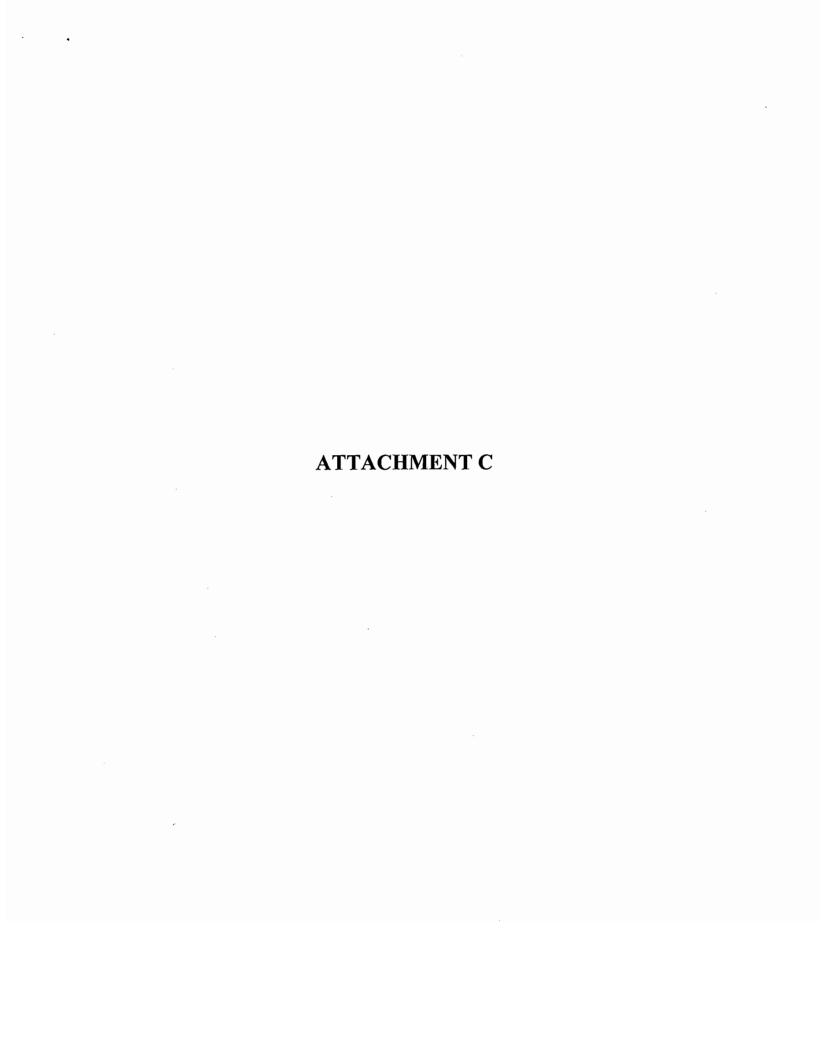
### **GENERAL ELECTRIC MODEL PG7241FA GAS TURBINE**

Effect of Compressor Inlet Temperature on Output, Heat Rate, Heat Consumption, Exhaust Flow And Exhaust Temperature at Baseload

Fuel: Distillate Combustor: DLN



M. Isedenu 5/26/99 544HA225 Rav - 0



## Continuous Emissions Monitoring Data Sam O. Purdom Generating Station Unit 8

11

23

36.6

				NOx	7
				Reading	
Year	Month	Day	Hour	(ppm)	Notes
0	10	2	12	26.7	Cold startup followed by two automated shutdowns for
0	10	2	13	47.9	low IP steam drum level and turbine synchronization
0	10	2	14	35.7	difficulty.
0	10	2	15	37.3	]
0	10	2	17	15.6	]
0	10	2	19	37	_
0	10	2	20	44.8	
0	10	2	21	25	]
0	10	2	22	31.9	1
0	10	2	23	51.5	
				NOx	]
				Reading	
Year	Month	Day	Hour	(ppm)	]
0	10	3	0	51.6	Lost steam turbine due to high hotwell level. Restarted
0	10	3	1	64.8	and achieved normal operation by 8:00AM
0	10	3	4	38	1
0	10	3	5	44.7	
0	10	3	6	54.4	4
0	10	3	7	17.4	
0	10	3	8	10.5	
0	10	3	9	10.1	4
0	10	3	10	9.5	1
0	10	3	11	9	4
0	10	3	12	8.8	4
0	10	3	13	8.9	4
0	10	3	14	9	
0	10	3	15	9	4
0	10	3	16	10.9	•
0	10	3	17	11.9	ł
0	10	3	18	9.1	·
0	10	3	19	9.2	
0	10	3	20		1
0	10	3	21	9.3	1
0	10	3	22	9.4 9.4	{
0	10	3	23		
				NOx	
				Reading	
Year	Month	Day	Hour	(ppm)	Morros etecture et 7:00DM Charteleure et 40:00DM
0	11	1	20	39.8	Warm startup at 7:20PM. Shutdown at 10:30PM due
0	11	1	21 .	39.5	to low IP drum level.
0	11	1	22	39.6	11/02/00 due to low IP drum level. Restarted unit again

	•			NOx
				Reading
Year	Month	Day	Hour	(ppm)
0	11	2	0	34.7
0	11	2	1	59.1
0	11	2	5	34.6
0	11	2	6	40.8
0	11	2	7	49.8
0	11	2	8	21.4
0	11	2	9	9
0	11 ·	2	10	8.7
0	11	2	11	9.6
0	11	2	12	9.2
0	11	2	13	9.2
0	11	2	14	9.2
0	11	2	15	9.1
0	11	2	16	9.1
0	11	2	17	9.1
0	11	2	18	9.1
0	11	2	19	9.1
0	11	2	20	8
0	11	2	21	8
0	11	2	22	10.3
0	11	2	23	10.2
				NOx

Shutdown again at 1:35AM due to low IP drum level. Restarted unit at 4:48AM.

Elected to shutdown unit at 12:07AM to test auxiliary equipment. Restarted unit at 4:30AM. Unit shutdown due to high vibration on steam turbine bearings At 8:50PM, unit ramped down to 23MW due to low fuel gas temp.

				NOx
:				Reading
Year	Month	Day	Hour	(ppm)
0	11	21	3	37.1
0	11	21	4	54.3
0	11	21	5	45.4
0	11	21	6	41.8
0	11	21	7	43.4
0	11	21	8	91.7
0	11	21	9	13.6
0	11	21	10	11.6
0	11	21	11	11.4
0	11	21	12	11.4
0	11	21	13	11.2
0	11	21	14	11.1
0	11	21	15	11.1
0	11	21	16	11.1
0	11	21	17	11.2
0	11	21	18	11
0	11	21	19	11.1
0	11	21	20	11.3
0	11	21	. 21	11.4
0	11	21	22	11.5
0	11	21	23	11.6
_				NOx

Hot startup at 3:25AM. Unit loading delayed due to high vibration on steam turbine bearing. Restarted unit. Normal operation achieved at 8:53AM

Reading Day Hour (ppm) Year Month 25.9 42.3 46.8 48.1 50.8 57.6 37.2 41.1 56.5 69.8 74.6 74.5 51.7 44.6 

Cold startup after two week outage. GE tuning DLN controls after combustor changeout. Tuning lasts until 1:30PM on 12/14/00

NOx Reading (ppm) Hour Month Day Year 55.4 75.8 77.1 76.2 75.4 83,1 95.2 61.2 22.7 9.4 9.1 9.5 9.1 9.1 11.6 10.3 NOx

GE DLN tuning ends at 1:30PM

Year         Month         Day         Hour (ppm)           0         12         23         0         11.3           0         12         23         1         11.3           0         12         23         2         11.4           0         12         23         3         11.5           0         12         23         4         11.7           0         12         23         5         11.8           0         12         23         6         16.8           0         12         23         7         42.4           0         12         23         9         44.2           0         12         23         10         63.4           0         12         23         11         2.5           0         12         23         13         40.2           0         12         23         14         53.5           0         12         23         15         48.9           0         12         23         16         81           0         12         23         16         81           0 <th></th> <th></th> <th></th> <th></th> <th></th>					
0         12         23         0         11.3           0         12         23         1         11.3           0         12         23         2         11.4           0         12         23         3         11.5           0         12         23         4         11.7           0         12         23         5         11.8           0         12         23         6         16.8           0         12         23         7         42.4           0         12         23         9         44.2           0         12         23         10         63.4           0         12         23         11         2.5           0         12         23         13         40.2           0         12         23         14         53.5           0         12         23         15         48.9           0         12         23         16         81           0         12         23         16         81           0         12         23         19         45.3           <					Reading
0         12         23         1         11.3           0         12         23         2         11.4           0         12         23         3         11.5           0         12         23         4         11.7           0         12         23         5         11.8           0         12         23         6         16.8           0         12         23         7         42.4           0         12         23         9         44.2           0         12         23         10         63.4           0         12         23         11         2.5           0         12         23         11         2.5           0         12         23         13         40.2           0         12         23         14         53.5           0         12         23         16         81           0         12         23         16         81           0         12         23         18         40           0         12         23         19         45.3 <td< th=""><th>Year</th><th>Month</th><th>Day</th><th>Hour</th><th></th></td<>	Year	Month	Day	Hour	
0         12         23         2         11.4           0         12         23         3         11.5           0         12         23         4         11.7           0         12         23         5         11.8           0         12         23         6         16.8           0         12         23         7         42.4           0         12         23         9         44.2           0         12         23         10         63.4           0         12         23         11         2.5           0         12         23         13         40.2           0         12         23         14         53.5           0         12         23         15         48.9           0         12         23         16         81           0         12         23         18         40           0         12         23         19         45.3           0         12         23         20         61	0	12	23	0	11.3
0         12         23         3         11.5           0         12         23         4         11.7           0         12         23         5         11.8           0         12         23         6         16.8           0         12         23         7         42.4           0         12         23         9         44.2           0         12         23         10         63.4           0         12         23         11         2.5           0         12         23         13         40.2           0         12         23         14         53.5           0         12         23         15         48.9           0         12         23         16         81           0         12         23         18         40           0         12         23         19         45.3           0         12         23         20         61	0	12	23	1	11.3
0     12     23     4     11.7       0     12     23     5     11.8       0     12     23     6     16.8       0     12     23     7     42.4       0     12     23     9     44.2       0     12     23     10     63.4       0     12     23     11     2.5       0     12     23     13     40.2       0     12     23     14     53.5       0     12     23     15     48.9       0     12     23     16     81       0     12     23     18     40       0     12     23     19     45.3       0     12     23     20     61	0	12	23	2	11.4
0     12     23     5     11.8       0     12     23     6     16.8       0     12     23     7     42.4       0     12     23     9     44.2       0     12     23     10     63.4       0     12     23     11     2.5       0     12     23     13     40.2       0     12     23     14     53.5       0     12     23     15     48.9       0     12     23     16     81       0     12     23     18     40       0     12     23     19     45.3       0     12     23     20     61	0	12	23	3	11.5
0     12     23     6     16.8       0     12     23     7     42.4       0     12     23     9     44.2       0     12     23     10     63.4       0     12     23     11     2.5       0     12     23     13     40.2       0     12     23     14     53.5       0     12     23     15     48.9       0     12     23     16     81       0     12     23     18     40       0     12     23     19     45.3       0     12     23     20     61	0	12	23	4	11.7
0     12     23     7     42.4       0     12     23     9     44.2       0     12     23     10     63.4       0     12     23     11     2.5       0     12     23     13     40.2       0     12     23     14     53.5       0     12     23     15     48.9       0     12     23     16     81       0     12     23     18     40       0     12     23     19     45.3       0     12     23     20     61	0	12	23	5	11.8
0     12     23     9     44.2       0     12     23     10     63.4       0     12     23     11     2.5       0     12     23     13     40.2       0     12     23     14     53.5       0     12     23     15     48.9       0     12     23     16     81       0     12     23     18     40       0     12     23     19     45.3       0     12     23     20     61	0	12	23	6	16.8
0     12     23     10     63.4       0     12     23     11     2.5       0     12     23     13     40.2       0     12     23     14     53.5       0     12     23     15     48.9       0     12     23     16     81       0     12     23     18     40       0     12     23     19     45.3       0     12     23     20     61	0	12	23	7	42.4
0     12     23     11     2.5       0     12     23     13     40.2       0     12     23     14     53.5       0     12     23     15     48.9       0     12     23     16     81       0     12     23     18     40       0     12     23     19     45.3       0     12     23     20     61	0	12	23	9	44.2
0     12     23     13     40.2       0     12     23     14     53.5       0     12     23     15     48.9       0     12     23     16     81       0     12     23     18     40       0     12     23     19     45.3       0     12     23     20     61	0	12	23	10	63.4
0     12     23     14     53.5       0     12     23     15     48.9       0     12     23     16     81       0     12     23     18     40       0     12     23     19     45.3       0     12     23     20     61	0	12	23	11	2.5
0     12     23     15     48.9       0     12     23     16     81       0     12     23     18     40       0     12     23     19     45.3       0     12     23     20     61	0	12	23	13	40.2
0     12     23     16     81       0     12     23     18     40       0     12     23     19     45.3       0     12     23     20     61	0	12	23	14	53.5
0     12     23     18     40       0     12     23     19     45.3       0     12     23     20     61	0	12	23	15	48.9
0 12 23 19 45.3 0 12 23 20 61	0	12	23	16	81
0 12 23 20 61	0	12	23	18	40
	0	12	23	19	45.3
	0	12	23	20	61
	0	12	23	21	14.1

Shutdown at 6:40AM due to fuel gas heater temp controller freezing. Restarted at 9:49AM. Shutdown at 10:35AM due to high exhaust temp spread. Restarted at 10:50AM. Shutdown at 11:10AM due to lost aux. transformer. Restarted at 1:15PM. Shutdown at 2:35PM due to low IP drum level. Restart unit at 2:58PM. Shutdown at 4:20PM due to high exhaust temp spread. Restarted unit at 6:08PM. Shutdown at 8:55PM due to low level in IP drum. Left unit off until 12/24/00

		_		NOx
l				Reading
Year	Month	Day	Hour	(ppm)
0	12	24	8	35.5
0	12	24	9	45.7
0	12	24	10-	50.8
0	12	24	11	43.9
. 0	12	24	12	12.2
0	12	24	13	12.1
0	12	24	14	12.2
0	12	24	15	12.3
0	12	24	16	12.4
0	12	24	17	12.5
0	12	24	18	11.1
0	12	24	19	11.6
0	12	24	20	12.5
0	12	24	21	12.6
0	12	24	22	12.7
0	12	24	23	12.7

Hot startup. Shutdown due to high vibrations. Restart at 9:55AM