



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

SCOTT MADDOX
Mayor

STEVE MEISBURG
Mayor Pro Tem

JOHN PAUL BAILEY
Commissioner

DEBBIE LIGHTSEY
Commissioner

RON WEAVER
Commissioner

ANITA R. FAVORS
City Manager

ROBERT B. INZER
City Treasurer-Clerk

JAMES R. ENGLISH
City Attorney

RICARDO FERNANDEZ
City Auditor

HAND-DELIVERED

December 15, 1997

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

RECEIVED

DEC 15 1997

**BUREAU OF
AIR REGULATION**

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

Dear Mr. Sheplak:

This letter is submitted to the Department of Environmental Protection (DEP) to confirm recent communications between DEP and City of Tallahassee (COT) personnel concerning the Draft Title V Permit for the Purdom Generating Station, dated October 13, 1997.

In a telcon between Mr. Bruce Mitchell, DEP, and Ms. Jennette Curtis, COT, on November 17, 1997, it was determined that a typographical error was made in Section II.A of the Proposed Permit Determination and will be corrected.

As per the December 12, 1997 meeting between you and Mr. Karl Bauer, COT, concerning the COT's clarification letter, which was hand delivered on that same date, it is our understanding that:

- DEP concurred that a formal guidance document had not been issued in regards to how to calculate Title V fees for sulfur dioxide emissions based on a fuel oil sulfur content limit. However, you indicated that a letter or other formal communication had been transmitted to industry (possibly the Florida Electric Coordinating Group, Inc.) in 1993 confirming that no fees would be required for natural gas usage. We appreciate your continued effort to identify this communication and will continue to do the same.
- You also indicated that although the COT's Purdom and Hopkins Title V permits are final, internal discussions continue at the DEP regarding Specific Conditions on the burning of used oil. Upon further decisions made by the DEP, it is the COT's understanding that an administrative permit revision may be requested to include those decisions.

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Page-2-

- Likewise, with the issuance of a December 2, 1997 version of Appendix TV-1, an administrative permit revision will be made by the DEP upon submittal of a request for such a change. This request is being submitted for both the Hopkins and Purdom Stations by separate letter, on this date, to ensure that the correct version is referenced by the effective date of these permits, which is January 1, 1998.

Thank you for your time and consideration of this matter. If you have any questions concerning this summary please do not hesitate to contact Jennette Curtis, Environmental Administrator, at 891-8850.

Sincerely,



Robert E. McGarrah
Production Superintendent
Title V Responsible Official

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

**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR RESOURCES MANAGEMENT**

**INSTRUCTIONS FOR DEP FORM NO. 62-210.900(1)(a)
AIR PERMIT APPLICATION FORM
ACID RAIN PART (PHASE II)**

The Acid Rain Program regulations require that the designated representative submit an Acid Rain Part application for each Acid Rain source with an Acid Rain unit. The Acid Rain Part application is binding on the owners and operators of the Acid Rain source and is enforceable in the absence of a Title V permit until the Department either issues a permit to the source or disapproves the application. You must submit the Acid Rain Part application for an initial Title V permit for Acid Rain sources no later than the deadlines for Title V permit applications under Rule 62-213.420, F.A.C.

STEP 1

Please type the required entries in the form.

If you need more space, make copies of the pertinent page(s).

When you have completed the form, indicate the page order and total number of pages (e.g., 1 of 4, 2 of 4, etc.) on each page of the submission.

The alternate designated representative may sign in lieu of the designated representative.

If you need further assistance, contact the office listed below.

STEP 2

The monitor certification deadline is the date on which the tabulation of emissions for purposes of compliance begins. You must determine this date in accordance with 40 CFR 75.4. If the commence operation date or monitor certification date changes, you must notify the Department under the administrative Acid Rain Part correction procedures of Rule 62-214.370, F.A.C.

Submission Instructions

Mail one form and any required attachments with original signatures, and three photocopies of the entire submission, to the following address:

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Division of Air Resources Management
Bureau of Air Regulation
MAIL STATION #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Protection

DIVISION OF AIR RESOURCES MANAGEMENT

AIR PERMIT APPLICATION FORM ACID RAIN PART (PHASE II)

For more information, see instructions, and refer to 40 CFR 72.30 and 72.31

This submission is: New Revised Copy of

STEP 1

Identify the source by plant name, State, and ORIS code from the National Allowance Data Base (NADB).

Plant Name	State	ORIS* Code
Sam O. Purdom	FL	689

*Office of Regulatory Information Systems

STEP 2

Enter boiler ID# from NADB for each unit, and indicate whether a repowering plan is applicable by entering "yes" or "no" at column b. For new units, enter requested information in columns c and d.

a Boiler ID#	b Repowering Plan?	c New Units Commence Operation Date	d New Units Monitor Certification Deadline
7	NO		
8	NO	02/21/00	05/24/00

STEP 3

If you responded "yes" in column b of Step 2 for any unit, mark the box

For each unit that will be repowered, the Repowering Extension Plan form is included and the Repowering Technology Petition form has been submitted, is included, or will be submitted by June 1, 1996.

Plant Name (from Step 1)

Sam O Purdom

STEP 4

Read the **Standard Requirements and Certification**, enter the name of the designated representative, and sign and date.

Standard Requirements

Permit Requirements.

(1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:

(a) Submit a complete Acid Rain part, including a compliance plan, under this part in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and Rule 62-214.320, F.A.C.

(b) Submit in a timely manner any supplemental information that the State determines is necessary in order to review an Acid Rain part application and issue or deny a Title V permit;

(2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:

(a) Operate the unit in compliance with a complete Acid Rain part application or a superseding Title V permit issued by the Department; and

(b) Have a Title V permit with an Acid Rain part.

Monitoring Requirements.

(1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source, and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR Parts 75 and 76.

(2) The emissions measurements recorded and reported in accordance with 40 CFR Parts 75 and 76 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.

(3) The requirements of 40 CFR Parts 75 and 76 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

(1) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:

(a) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount, after deductions by EPA under 40 CFR 73.34(c), not less than the total annual emissions of sulfur dioxide from the unit for the previous calendar year; and

(b) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.

(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.

Plant Name (from Step 1) Sam O. Purdom

Sulfur Dioxide Requirements (Continued).

(3) An Acid Rain unit shall be subject to the requirements under Rule 62-214.330(1), F.A.C., and 40 CFR 72.9(c)(1) as follows:

(a) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2) that is not a substitution or compensating unit; or

(b) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR Part 75, an Acid Rain Unit under 40 CFR 72.6(a)(3) that is not a substitution or compensating unit.

(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts by EPA in accordance with the Acid Rain Program.

(5) An allowance shall not be deducted in order to comply with the requirements under 40 CFR 72.9(c)(1) prior to the calendar year for which the allowance was allocated.

(6) An allowance allocated by EPA under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Title V permit application that includes the Acid Rain Part, the Title V permit that includes the Acid Rain Part, or the written exemption under Rule 62-214.340, F.A.C., and 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(7) An allowance allocated by EPA under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements.

The owners and operators of the Acid Rain source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides, pursuant to 40 CFR Part 76.

Excess Emissions Requirements.

(1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR Part 77.

(2) The owners and operator of an Acid Rain unit that has excess emissions in any calendar year shall:

(a) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR Part 77; and

(b) Comply with the terms of an approved offset plan, as required by 40 CFR Part 77.

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the Acid Rain source and each Acid Rain unit at the source shall keep on-site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause in writing by EPA, at any time prior to the end of the 5 years.

Plant Name (from Step 1)
Sam O. Purdom

Recordkeeping and Reporting Requirements (Continued).

- (a) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on-site at the source beyond such 5-year period until such documents are superseded because of a new certificate of representation changing the designated representative;
 - (b) All emissions monitoring information, in accordance with 40 CFR Part 75;
 - (c) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and
 - (d) Copies of all documents used to complete the Acid Rain Part application, and any other submission under the Acid Rain Part, or to demonstrate compliance with the Acid Rain Program.
- (2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR Part 72 subpart I and 40 CFR Part 75.

Liability.

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain Part application, a Title V permit with an Acid Rain Part, or a written exemption under Rule 62-214.340, F.A.C., or 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to 42 U.S.C. 7413(c).
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to 42 U.S.C. 7413(c) and 18 U.S.C. section 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program, including Chapter 62-214, F.A.C.
- (5) Any provision of the Acid Rain Program that applies to an Acid Rain source, including a provision applicable to the designated representative of an Acid Rain source, shall also apply to the owners and operators of such source and the Acid Rain units of the source.
- (6) Any provision of the Acid Rain Program that applies to an Acid Rain unit, including a provision applicable to the designated representative of an Acid Rain unit, shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44, Phase II repowering extension plans, and 40 CFR Part 76, and except with regard to the requirements applicable to units with a common stack under 40 CFR Part 75, including 40 CFR 75.16, 75.17, and 75.18, the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

Plant Name (from Step 1)
Sam O. Purdom

Liability (Continued).

(7) Each violation of a provision of 40 CFR Parts 72, 73, 75, 76, 77, 78, or Chapter 62-214, F.A.C., by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

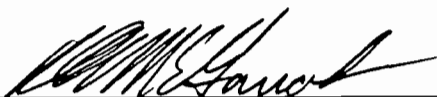
Effect on Other Authorities.

No provision of the Acid Rain Program, an Acid Rain Part application, a Title V permit with Acid Rain Part, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in Title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provisions of the Act, including the provisions of Title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; **provided**, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program of competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information, or omitting required statements and information, including the possibility of fine or imprisonment.

Robert E. McGarrah	
Name	
Signature 	Date 3/4/97



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City Manager

ROBERT B. INZER
City Treasurer-Clerk

JAMES R. ENGLISH
City Attorney

RICARDO FERNANDEZ
City Auditor

7/21/97
cc: Jonette Curtis
Bruce Mitchell

July 18, 1997

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

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JUL 18 1997

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JUL 18 1997

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BUREAU OF
AIR REGULATION
JUL 18 1997

RE: Scheduling of PPSA/PSD/Title V Permitting for Purdom Unit 8 Project

Dear Mr. Sheplak,

As both you and I and members of your staff have discussed, the above-mentioned permitting schedule can be somewhat onerous. In order to continue our efforts in coordinating this process with the Department, attached please find the applicable legal requirements and suggested timeline for synchronizing the Power Plant Siting Act (PPSA), Prevention of Significant Deterioration (PSD), and Title V permitting process for Purdom Unit 8. Specifically, we are including a bullet summary of the applicable legal citations which authorize, and in fact mandate, the concurrence of the PPSA/PSD/Title V permitting programs, followed by the timeline for successfully completing this process. If you have any questions or would like to discuss any of this information further, please do not hesitate to contact me at 891-8850.

Sincerely,

Jennette Curtis
Environmental Administrator

Attachments

cc: Buck Oven, DEP
Chip Collette, DEP
Rob McGarrah, COT
Karl Bauer, COT
Doug Fulle, FWE
Gary Sams, HGSS
Angela Morrison, HGSS

ATTACHMENT A

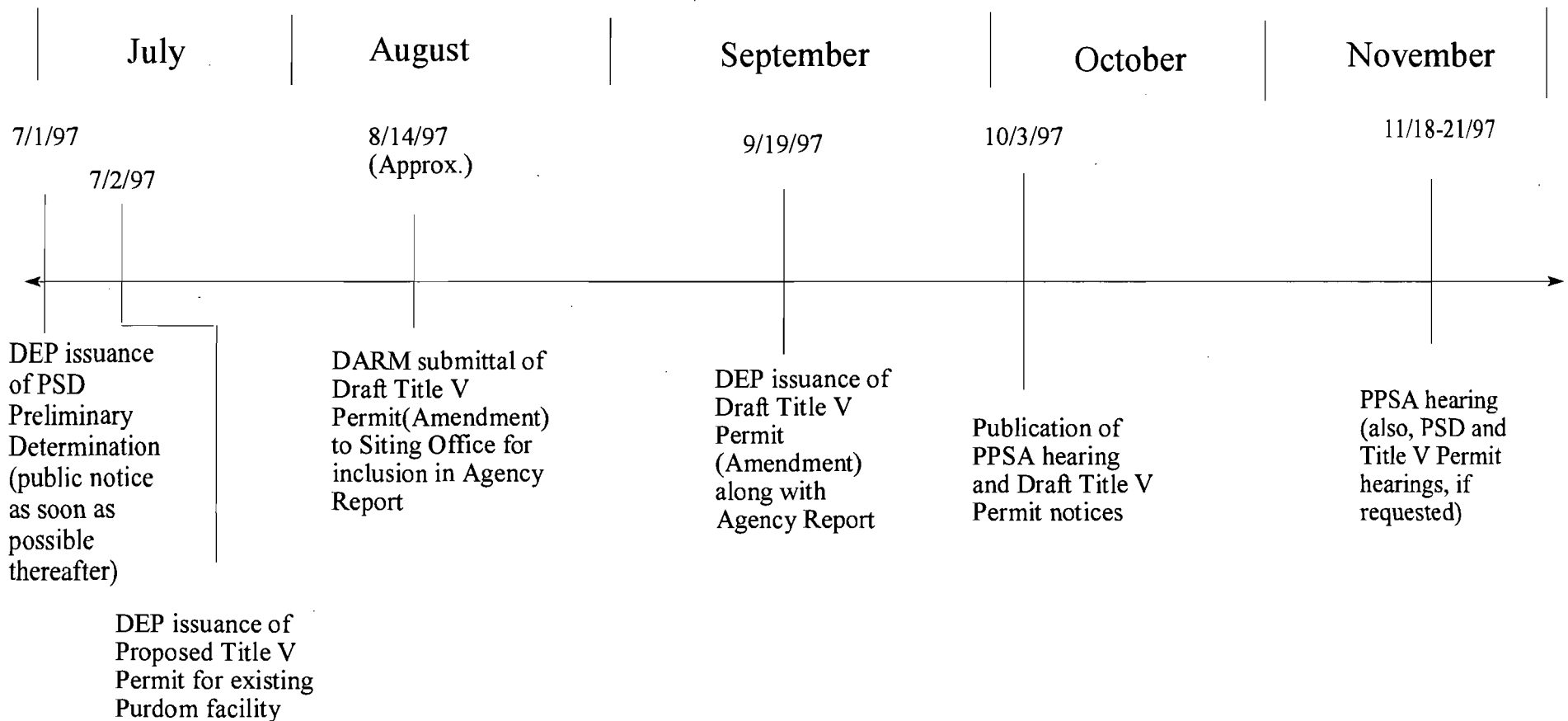
LEGAL AUTHORITY FOR THE CONCURRENCE OF THE PPSA/PSD/TITLE V PERMITTING PROCESS FOR THE PURDOM UNIT 8 PROJECT

Based on the following statutory and regulatory provisions and the attached timeline, the concurrence of the PPSA, PSD, and Title V permitting processes is not only authorized and possible, but mandated.

- DEP has the authority "[t]o issue, with the electrical power plant certification, any license required pursuant to any federally delegated or approved permit program." § 403.504(10), F.S.
- "It is the intent of the Legislature that the issuance of [PSD] permits be closely coordinated with the certification procedures established under this part." § 403.508(8), F.S.
- Under Florida's Title V rules, sources "that apply for [PPSA] Certification subsequent to October 25, 1995, may, at their option, apply for a permit under the provisions of this chapter at the same time the Florida Power Plant Siting Certification application is submitted." Rule 62-213.420(1)(a)2., F.A.C. (emphasis added).
- Florida's Title V rules provide that "[t]he Title V source may conform its application for construction permit to include all information required by Rule 62-213.420, F.A.C. [i.e., the requirements for a Title V application], in lieu of submitting separate application forms." Rule 62-213.412, F.A.C. Further, Florida's rules provide that an owner or operator may request that DEP process a Title V application concurrently with the construction permit application. Instructions to DEP Form 62-210.900(1), page 3.
- "The [PPSA] certification hearing shall constitute the sole hearing allowed by chapter 120 to determine the substantial interest of a party regarding any required agency license or any related permit required pursuant to any federally delegated or approved permit program." (emphasis added) § 403.508(3), F.S.
- The PPSA also provides that the PSD/Title V application is to be "processed within the time periods allowed by this act, in lieu of those specified in s. 120.60." § 403.506(3), F.S. To accomplish this schedule, the PPSA establishes the following requirements:
 - (1) A PSD Preliminary Determination must be issued no later than 60 days after the PSD application is "complete and sufficient." § 403.507(3), F.S.
 - (2) The PSD Preliminary Determination and the **Intent to Issue the Title V Permit** must be included in the "written analysis" (i.e., agency report), which must be issued 60 days prior to the certification hearing. § 403.507(4)(e), F.S.
 - (3) In accordance with the mandate in § 403.508(3), F.S. quoted above, the PPSA certification hearing must include, if a petition is filed, the administrative hearing on the PSD Preliminary Determination. § 403.507(3), F.S.
 - (4) The "proposed" Title V permit and the final PSD permit must be issued no later than 30 days after the issuance of the certification. § 403.509(3), F.S.

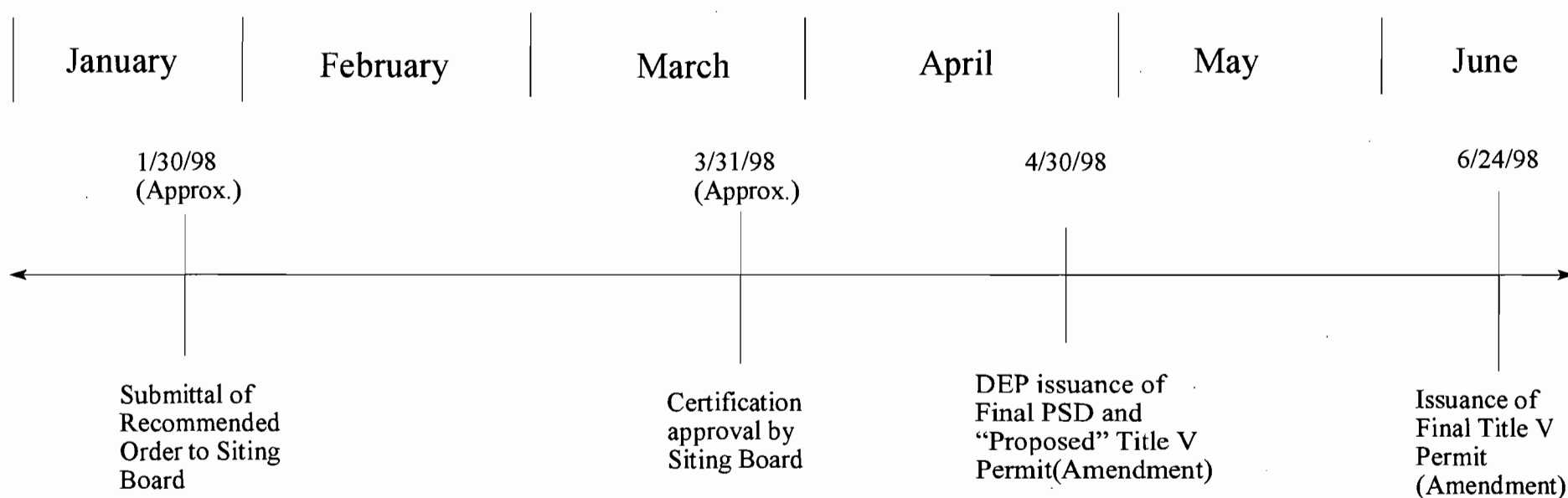
ATTACHMENT B

Suggested Timeline for Synchronizing the PPSA/PSD/Title V Permitting Process for the Purdom Unit 8 Project



ATTACHMENT B

Suggested Timeline for Synchronizing the PPSA/PSD/Title V Permitting Process for the Purdom Unite 8 Project





Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

May 6, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert E. McGarrah, Production Superintendent
City of Tallahassee, Electric Utility
2602 Jackson Bluff Road
Tallahassee, Florida 32304

Re: Title V Permit Revision Application for Unit Number 8
File No.: 1290001-003-AV
Sam O. Purdom Generating Station, Wakulla County

Dear Mr. McGarrah:

The application for revision to the Title V permit for the Sam O. Purdom Generating Station received on March 7, 1997, submitted with the Site Certification application, can not be further acted upon until the Prevention of Significant Deterioration (PSD)/New Source Review (NSR) construction permit has been finalized.

The processing of this application will continue when the Title V Section receives a written notification from the City of Tallahassee stating that the PSD/NSR construction permit has been issued in its final version and that a copy of this final permit has been provided to the Title V Section.

If the PSD/NSR permit is not finalized within ninety days of receipt of this letter, a request for additional time to process the Title V operation permit revision request needs to be made pursuant to Rule 62-213.420(1)(b)6., F.A.C.

If you should have any questions, please contact Jonathan Holtom or me at (904) 488-1344.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/jh

CC: Mr. Darrel Graziani, P.E., Foster Wheeler Environmental Corporation
Mr. Karl Baur, P.E., City of Tallahassee
Mr. Ed Middleswart, DEP, Northwest District Office
Mr. Gerry Neubauer, DEP, Northwest District Branch Office
Mr. Buck Oven, DEP, Power Plant Siting Office
Mr. Al Linero, DEP, PSD/New Source Review Section

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Robert E. McGarrah, Production
 Superintendent
 City of Tallahassee, Electric Utility
 2602 Jackson Bluff Road
 Tallahassee, Florida 32304

4a. Article Number

P 265 658 345

4b. Service Type

- Registered
- Express Mail
- Return Receipt for Merchandise
- Certified
- Insured
- COD

7. Date of Delivery

5/7/97

5. Received By: (Print Name)

Melissa Suggs

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

Melissa Suggs
 PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 265 658 345

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to
 Mr. Robert E. McGarrah, Production
 Superintendent
 City of Tallahassee, Electric Utility
 2602 Jackson Bluff Road
 Tallahassee, Florida 32304

Certified Fee	1.10
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	1.10
Return Receipt Showing to Whom Date, & Addressee's Address	
TOTAL Postage & Fees	2.20
Postmark or Date	TALLAHASSEE FL 5/6/97

PS Form 3800 April 1995



CITY HALL
300 S. ADAMS ST.
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JAMES R. ENGLISH
City Attorney
RICARDO FERNANDEZ
City Auditor

March 7, 1997

Via Hand Delivery

John Brown, P.E.
Administrator, Title V Program
Division of Air Resources Management
Department of Environmental Protection
Magnolia Park Courtyard
Tallahassee, FL 32301

RECEIVED

MAR 7 1997

**BUREAU OF
AIR REGULATION**

RE: Purdom Unit 8 Project
Site Certification Application

Dear Mr. Brown:

The City of Tallahassee is today filing a Site Certification Application (SCA) with the Department of Environmental Protection's Siting Coordination Office for a new unit (Unit 8) at its Sam O. Purdom Generating Station. The SCA requests certification of the existing site simultaneously with the new unit. Because the SCA includes not only a Prevention of Significant Deterioration preconstruction review permit application, but also a supplemental Title V air operation permit application, we wanted to inform the Division of Air Resources Management and request that the Department consider the *supplemental* Title V application separately from the *pending* Title V application.

As authorized under Rule 62-213.420(1)(a)2, Florida Administrative Code (F.A.C.), the City has included a supplemental Title V application for the Unit 8 Project along with the SCA. Previously, as also required by the Department's rules, the City submitted its initial Title V permit application on June 14, 1996, and later supplemented that application on December 20, 1996. We understand that the initial permit must be issued by no later than December 31, 1997, because it will include an acid rain permit (40 CFR 72.73(b)(1)). Notwithstanding the provisions of Rule 62-213.420(1)(a)5, the City requests that the Department issue the draft Title V permit based on the currently pending application prior to December 31, 1997, and *separately* review and act upon the Title V permit revision being requested in conjunction with the Unit 8 Project. This will allow the initial Title V permit for the existing facility to be issued before the end of the year, as required under the acid rain program, and provide the Department with sufficient time to review and process the Title V permit revision being requested as part of the SCA submittal in parallel with the site certification process.

John Brown, P.E.
Administrator, Title V Program
Division of Air Resources Management
Department of Environmental Protection
March 7, 1997
Page 2

The City's legal counsel has discussed this approach with Pat Comer of the Department's Office of General Counsel, and we understand that Pat found this approach to be acceptable. The City would like to thank you and your staff for your continued cooperation and assistance with the issuance of our Title V permit. If you or your staff have any questions regarding the SCA submittal or the proposed approach regarding the Title V permit applications, please let us know.

Sincerely,



Robert E. McGarrah
Title V Responsible Official

cc: Hamilton S. Oven, Jr., DEP Siting
Charles T. (Chip) Collette, DEP OGC
Patricia Comer, DEP OGC
Howard L. Rhodes, DEP DARM
Clair H. Fancy, P.E., DEP DARM
Jonathan Holtom, DEP DARM
Jennette Curtis, COT
Angela Morrison, HGSS

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION) 3. _____
1. Bruce / Scott 4. _____
2. _____ 5. _____

PLEASE PREPARE REPLY FOR:
 SECRETARY'S SIGNATURE
 DIV/DIST DIR SIGNATURE
 MY SIGNATURE
 YOUR SIGNATURE
 DUE DATE _____

ACTION/DISPOSITION
 DISCUSS WITH ME
 COMMENTS/ADVISE
 REVIEW AND RETURN
 SET UP MEETING
 FOR YOUR INFORMATION
 HANDLE APPROPRIATELY
 INITIAL AND FORWARD
 SHARE WITH STAFF
 FOR YOUR FILES

COMMENTS:
Let's discuss on Monday.

FROM: John B DATE: 3/10 PHONE: _____

Appendix H-1, Permit History/ID Number Changes

City of Tallahassee
Sam O. Purdom Generating Station

[DRAFT/PROPOSED/FINAL]Permit No.: 1290001-001-AV
Facility ID No.: 1290001

Permit History (for tracking purposes):

E.U.

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u> ^{1,2}	<u>Revised Date(s)</u>
-001	Boiler #1	AO65-242828	03/25/94	03/01/99		
-002	Boiler #2	AO65-242828	03/25/94	03/01/99		
-003	Boiler #3	AO65-242828	03/25/94	03/01/99		
-004	Boiler #4	AO65-242828	03/25/94	03/01/99		
-005	Boiler #5	AO65-242831	03/08/94	03/01/99		
-006	Boiler #6	AO65-242831	03/08/94	03/01/99		
-007	Boiler #7	AO65-242831	03/08/94	03/01/99		
-008	Combustion Turbine #1	AO65-242827	03/08/94	03/01/99		
-009	Combustion Turbine #2	AO65-242827	03/08/94	03/01/99		

(if applicable) ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 10TLH6500001

To: **Facility ID No.:** 1290001

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}



Department of Environmental Protection

Barbara
Boilers #
1-4

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

September 26, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert E. McGarrah, Production Superintendent
City of Tallahassee, Electric Utility
2602 Jackson Bluff Road
Tallahassee, Florida 32304

Re: Request for Additional Information Regarding Initial Title V Permit Application
File No.: 1290001-001-AV
Sam O. Purdom Generating Station, Wakulla County

Dear Mr. McGarrah:

The initial Title V permit application for the Sam O. Purdom Generating Station was received in a timely manner (June 14, 1996) and has been deemed complete by default. However, in order to continue processing this application, the Department is requesting the additional information outlined below. Should your response to any of the listed items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The Department's records indicate that you have a valid air operation permit (AO65-242828) for boilers 1-4 that expires on March 1, 1999. However, the initial Title V application does not mention their existence. It is our understanding that these boilers are in a "cold stand-by" mode and may be in the process of being dismantled. Please provide either the appropriate application data for boilers 1-4, or if you choose not to obtain a Title V permit for those boilers and are indeed dismantling them, you should submit a letter to the entity that issued the permit that states that you are surrendering it and provide a copy of the letter to the Title V Section in Tallahassee.
2. The application data for boilers 5 and 6 request an SO₂ limit of 1.3 lb/MMBtu. The limit that was established in the State Implementation Plan (SIP), which is contained in Rule 62-296.405(1)(c)1.h., Florida Administrative Code (F.A.C.), is 1.87 lb/MMBtu. The Department is not able to use the Title V permit as a means of altering the SIP standards. Therefore, we intend to issue the Title V permit with the SIP limit of 1.87 lb/MMBtu. If you choose to change the limit through the SIP process, please advise. At that time, I will tell you how it needs to be done.

Mr. Robert E. McGarrah
City of Tallahassee, Electric Utilities
Additional Information Request
Page 2 of 2

The above comments require a written response to the Department within ninety days of receipt of this notice unless additional time is requested pursuant to Rule 62-213.420(1)(b)6., F.A.C.

If you should have any questions, please contact Jonathan Holtom or me at (904) 488-1344.

Sincerely,



John C. Brown, Jr., P.E.

Administrator
Title V Section

JCB/jh

CC: Mr. Darrel Graziani, P.E., Foster Wheeler Environmental Corporation
Mr. Ed Middleswart, Northwest District Office
Mr. Gerry Neubauer, DEP, Northwest District Branch Office

Cold Standby

F



Lawton Chiles
Governor

Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:
City of Tallahassee

I.D. Number: 10TLH65000101-04
Permit/Certification Number: AO65-242828
Date of Issue: March 25, 1994
Expiration Date: March 1, 1999
County: Wakulla
Latitude/Longitude: 30°09'30"N/84°12'00"W
Project: Purdom Boilers Nos. 1-4

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of Boilers 1-4, each with a heat input capacity of 115 million Btu/hour producing nominally 85,000 pounds of steam per hour to run a nominal 7,500 kw turbine-generator. Boilers 1 and 2 are fueled with No. 6 fuel oil; Boilers 3 and 4 are fueled with natural gas and/or No. 6 fuel oil.

Located on the east side of SR 363 in St. Marks.

Specific Condition No. 2 establishes a maximum operating and testing rate.

Specific Condition No. 3 establishes requirements prior to any future operation.

Specific Condition No. 5 identifies allowable emissions.

Specific Condition No. 6 identifies compliance testing requirements.

Specific Condition No. 7 identifies the maximum fuel oil sulfur content.

Specific Condition No. 9 requires submission of annual operation reports.

Specific Condition No. 10 requires submission of a Major Air Pollution Source Annual Operation Fee Form.

Specific Condition No. 12 requires submission of a renewal operation permit application by December 31, 1998.

PERMITTEE:
City of Tallahassee

I.D. Number: 10TLH65000101-04
Permit/Certification Number: AO65-242828
Date of Issue: March 25, 1994
Expiration Date: March 1, 1999

SPECIFIC CONDITIONS:

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- The attached General Conditions are part of this permit.
- The maximum allowable heat input is 115 million Btu per hour per boiler. Testing of particulate emissions shall be conducted with the source operating at capacity. Capacity is defined as 90 to 100% of the maximum allowable heat input rate for the fuel or mix of fuels being burned. If it is impracticable to test at capacity, then sources may be tested at less than capacity; if the source is tested at less than capacity, subsequent source operation on the fuel or fuel mix burned during testing is limited to 110% of the test capacity until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit with prior notification to the Department.
- These boilers shall not be operated unless:
 - The Permittee advises the Department in writing at least 14 days prior to such resumed operation.
 - A visible emissions compliance test is conducted within the first 30 days of operation.
- The maximum hours of operation are 24 hours/day, 7 days/week, and 52 weeks/year. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually.
- The maximum allowable emission rate for each pollutant per source is as follows:

EU

F?

EU

EU

Pollutant	FAC Rule	Allowable Emission Rate
VE	17-296.406 17-210.700	20% opacity* 60% during Excess Emissions
PM	17-296.406(BACT) 17-210.700	0.1 lb/MMBtu** 0.3 lb/MMBtu during Excess Emissions**
SO ₂	17-296.406(BACT)	1.87 lb/MMBtu

*Except for one two minute period/hour of not more than 40% opacity.

**Emissions of particulate matter shall not exceed 0.1 (normal operations) and 0.3 (during excess emissions) lbs/MMBtu heat input when firing fuel oil. No particulate matter limit shall apply when firing natural gas. The excess emissions provisions of F.A.C. Rule 17-210.700 shall apply during periods of startup, shut down and malfunctions.

PERMITTEE:
City of Tallahassee

I.D. Number: 10TLH65000101-04
Permit/Certification Number: AO65-242828
Date of Issue: March 25, 1994
Expiration Date: March 1, 1999

SPECIFIC CONDITIONS:

6. Emissions tests for the following pollutants for each source shall be performed between July 1 and September 30 during each year the source is operated in accordance with the test methods and frequency indicated, with notification to the Department 15 days prior to testing. An emission test conducted pursuant to specific condition 3 shall serve as the initial annual test. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. For good cause, the Permittee may request an extension of a compliance test due date. However, inadequate planning of testing does not constitute good cause for an extension of the compliance test due date. The test report documentation must be submitted to the Department within 45 days after completion of testing.

<u>Pollutant</u>	<u>Frequency</u>	<u>Test Method</u>
VE*	Annually, during normal operations Annually, during "excess emissions", when applicable	DEP 9
PM*, *1	Annually Annually, during "excess emission", when applicable	EPA 1, 2, 3, 5 or 17

* Shall be conducted using the maximum fuel oil to gas ratio in use during the current test year.

*1 No particulate or visible emissions test shall be required in any federal fiscal year in which the fossil fuel steam generator did not burn fuel oil for more than 400 hours other than during startup.

The VE test shall be conducted during on the the PM test runs. Test reports shall comply with F.A.C. Rule 17-297.570, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 17-297.340(2).

7. If fueled 100% by oil the sulfur content of the oil shall not exceed 1.8% by weight. Records of fuel oil sulfur content shall be kept and made available for Department inspections.

8. Satisfactory ladders, platforms, and other safety devices as well as necessary parts shall be provided, maintained, and made available as necessary to facilitate compliance inspections.

9. An annual operation report [DEP Form 17-210.900(4) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the Permittee and used for future annual submittals.

PERMITTEE:
City of Tallahassee

I.D. Number: 10TLH65000101-04
Permit/Certification Number: AO65-242828
Date of Issue: March 25, 1994
Expiration Date: March 1, 1999

SPECIFIC CONDITIONS:

10. In accordance with F.A.C. Rule 17-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 17-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the Permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

11. This source shall be operated in such a fashion so as to preclude objectionable odors.

12. An application to renew this permit shall be submitted prior to December 31, 1998.

13. The permanent source identification numbers for these point sources are:

- 10TLH65000101 - Boiler 1
- 10TLH65000102 - Boiler 2
- 10TLH65000103 - Boiler 3 (Also natural gas fired)
- 10TLH65000104 - Boiler 4 (Also natural gas fired)

Please cite the appropriate number on all test reports and other correspondence specific to a permitted point source.

14. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, use telephone number (904) 488-3704 during normal working hours.

Expiration Date:

Issued this ^{25th} day of March, 1994.

March 1, 1999

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794 • 904-436-8300

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary
Robert Kriegel, Deputy Assistant Secretary

PERMITTEE:

City of Tallahassee

I.D. Number: 10TLH65000101 & 10TLH65000102

Permit/Certification Number: A037-159968

Date of Issue: March 3, 1989

Date of Modification: MAR 16 1989

Expiration Date: March 1, 1994

GENERAL CONDITIONS:

14. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

15. The maximum allowable heat input is 115 million Btu per hour each. This is the heat input at which compliance with standards shall be demonstrated.

16. These sources shall not be operated unless:

- A. The permittee advises the Department in writing prior to such resumed operation, and
- B. a visible emissions compliance test is conducted within the first 30 days of such operation.

17. Visible emissions shall not exceed 20 opacity under normal operation except for up to 2 minutes in any one hour at not more than 40% opacity.

18. Sulfur dioxide emissions shall not exceed 1.87 pounds per million Btu of heat input. The sulfur content of the oil shall not exceed 1.80%.

19. Visible emissions tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with EPA Method 9. Such tests shall be conducted once per year before the end of September. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing. A test run in accordance with condition 16B shall serve as the first such annual test. Annual tests are waived if not operated. The two boilers will be individually treated by all conditions of this permit.

20. An annual operation reports (DER Form 17-1.202(6) attached) shall be submitted by March 1 each year. The attached forms shall be reproduced by the permittee and used for future annual submittals.

PERMITTEE:

City of Tallahassee
Sam O. Purdom Plant

I.D. Number: 10TLH65000101 & 10TLH65000102

Permit/Certification Number: A065-159968

Date of Issue: March 3, 1989

Date of Modification: MAR 16 1989

Expiration Date: March 1, 1994

County: Wakulla

Latitude/Longitude: 30°09'30"N/84°12'00"W

Section/Township/Range: 2/4S/1E

Project: Purdom Boilers #1 & 2

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Operation of Boilers #1 and #2, capacity 115 million Btu/hour heat input (each), fueled by #6 fuel oil. Each produces 85,000 pounds of steam per hour to run a 7,500 KW turbine-generator. Particulates are controlled by proper combustion. Sulfur dioxide emissions are controlled by the sulfur content of fuel.

These boilers have not operated since 1980. The Department must be notified prior to any future operation.

Located: East side of SR 363 in St. Marks.

PERMITTEE:

City of Tallahassee

I.D. Number: 10TLH65000101 & 10TLH65000102

Permit/Certification Number: A037-159968

Date of Issue: MAR 03 1989

Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:

21. An application to renew this permit shall be submitted prior to January 1, 1994.

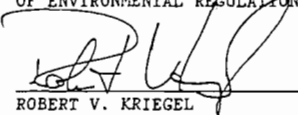
22. The permanent source identification numbers for this point source is 10TLH65000101 Purdom boiler #1 and 10TLH65000102 Purdom boiler #2. Please cite these numbers on all test reports and other correspondence specific to this permitted point source.

Expiration date:

March 1, 1994

Issued this 3rd day of March,
1989.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



ROBERT V. KRIEGEL

Deputy Assistant Secretary



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794 • 904-436-8300

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary
Robert Kneigel, Deputy Assistant Secretary

PERMITTEE:

City of Tallahassee
Sam O. Purdom Plant

I.D. Number: 10TLH65000103 & 10TLH65000104
Permit/Certification Number: A065-159969
Date of Issue: March 3, 1989
Date of Modification: MAR 16 1989
Expiration Date: March 1, 1994
County: Wakulla
Latitude/Longitude: 30°09'30"N/84°12'00"W
Section/Township/Range: 2/4S/1E
Project: Purdom Boilers #3 & 4

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Operation of Boilers #3 and #4, capacity 115 million Btu/hour heat input (each), fueled by #6 fuel oil and/or natural gas. Each produces 85,000 pounds of steam per hour to run a 7,500 KW turbine-generator. Particulates are controlled by proper combustion. Sulfur dioxide emissions are controlled by the sulfur content of fuel.

These boilers have not operated since 1982. The Department must be notified prior to any future operation.

Located: East side of SR 363 in St. Marks.

PERMITTEE:

City of Tallahassee

I.D. Number: 10TLH65000103 & 10TLH65000104
Permit/Certification Number: A037-159969
Date of Issue: March 3, 1989
Date of Modification: MAR 16 1989
Expiration Date: March 1, 1994

GENERAL CONDITIONS:

14. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

15. The maximum allowable heat input is 115 million Btu per hour each. This is the heat input at which compliance with standards shall be demonstrated.

16. These sources shall not be operated unless:

- A. The permittee advises the Department in writing prior to such resumed operation, and
- B. a visible emissions compliance test is conducted within the first 30 days of such operation.

17. Visible emissions shall not exceed 20 opacity under normal operation except for up to 2 minutes in any one hour at not more than 40% opacity.

18. Sulfur dioxide emissions shall not exceed 1.87 pounds per million Btu of heat input. If fueled by 100% oil, sulfur content of the oil shall not exceed 1.80%.

19. Visible emissions tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with EPA Method 9. Such tests shall be conducted once per year before the end of September. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing. A test run in accordance with condition 16B shall serve as the first such annual test. Annual tests are waived if not operated. The two boilers will be individually treated by all conditions of this permit.

20. An annual operation reports (DER Form 17-1.202(6) attached) shall be submitted by March 1 each year. The attached forms shall be reproduced by the permittee and used for future annual submittals.

PERMITTEE:

City of Tallahassee

I.D. Number: 10TLH65000103 & 10TLH65000104

Permit/Certification Number: A037-159969

Date of Issue: MAR 03 1989

Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:

21. An application to renew this permit shall be submitted prior to January 1, 1994.

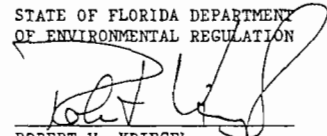
22. The permanent source identification numbers for this point source is 10TLH65000103 Purdom boiler #3 and 10TLH65000104 Purdom boiler #4. Please cite these numbers on all test reports and other correspondence specific to this permitted point source.

Expiration date:

March 1, 1994

Issued this 3rd day of March,
1989.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


ROBERT V. KRIEGEL
Deputy Assistant Secretary



Lawton Chiles
Governor

Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

W 3/1A

PERMITTEE:

City of Tallahassee
Sam O. Purdom Power Plant

I.D. Number: 10TLH65000105,06,07
Permit/Certification Number: AO65-242831
Date of Issue: March 8, 1994
Expiration Date: March 1, 1999
County: Wakulla
Latitude/Longitude: 30°09'30"N/84°12'00"W
Project: Purdom Boilers 5,6,7

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of Boilers 5, 6, and 7 at the City of Tallahassee's Purdom Power Plant. Boilers 5 and 6 each have a maximum 300 MMBtu/hr heat input, are natural gas and/or No. 6 fuel oil fired, produce nominally 220,000 pounds of steam per hour, and each run a nominal 22 MW turbine-generator. Boiler 7 has a maximum 621 MMBtu/hr heat input, is fired with natural gas and/or No. 6 fuel oil, produces nominally 500,000 pounds of steam per hour, and runs a nominal 44 MW turbine-generator.

Located on the east side of State Road 363 in St. Marks.

Specific Condition No. 2 establishes maximum allowable operating and testing rates.

Specific Condition No. 4 establishes maximum allowable emission rates.

Specific Condition No. 5 establishes compliance testing requirements.

Specific Condition No. 6 limits fuel oil sulfur content.

Specific Condition No. 8 requires submission of an annual operation report.

Specific Condition No. 9 requires submission of a Major Air Pollution Source Annual Operation Fee Form.

Specific Condition No. 10 requires submission of a renewal permit application by December 31, 1998.



Lawton Chiles
Governor

Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

April 8, 1994

Jennette Curtis
Environmental Services Administrator
Electric Department
City of Tallahassee
300 South Adams Street
Tallahassee, Florida 32301-1731

Dear Ms. Curtis:

This is in response to your letter dated March 29, 1994 to Andrew Allen, requesting additional changes to permits AO65-242831, AO37-242824 and AO65-242827.

Concerning specific condition 5 of permit AO65-242831 for Purdom Boilers 5, 6 and 7, you asked that the third sentence be deleted. This clarifies that testing shall be conducted using the maximum fuel oil to gas ratio in use during the current test year as stated in the footnote and is consistent with the language in other permits issued to the City. This request is approved, and this letter deletes that sentence which read as follows:

The tests shall be conducted using the maximum fuel/natural gas ratio to be used during the subsequent operating year.

Concerning specific condition 18 of permit AO37-242824, you asked that specific condition 18 be renumbered to 11 to be in numerical sequence. This request is approved.

Please make the appropriate changes to your permits and attach a copy of this letter to the permits.

If you have any questions, please contact Bob Kriegel of this office at (904) 444-8364.

Sincerely,

Bobby A. Cooley

Bobby A. Cooley
District Director

BAC:bkc

cc: DEP Tallahassee Branch Office

PERMITTEE:
City of Tallahassee
Sam O. Purdom Power Plant

I.D. Number: 10TLH65000105,06,07
Permit/Certification Number: AO65-242831
Date of Issue: March 8, 1994
Expiration Date: March 1, 1999

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. The maximum allowable heat input rate is for Boilers 5 and 6 is 300 MMBtu/hour per boiler. The maximum allowable heat input rate for Boiler 7 is 1 MMBtu/hour. Testing of particulate emissions shall be conducted with the source operating at capacity. Capacity is defined as 90 to 100% of the maximum allowable heat input rate for the fuel or mix of fuels being burned. If it is impracticable to test at capacity, then sources may be tested at less than capacity; if the source is tested at less than capacity subsequent source operation is limited to 110% of the test capacity until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.
3. The maximum hours of operation are 24 hours/day, 7 days/week, and 52 weeks/year. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually.
4. The maximum allowable emission rate for each pollutant per source is as follows:

Pollutant	FAC Rule	Allowable Emission Rate
VE	17-296.405 17-210.700	20% opacity * 60% during Excess Emissions
PM	17-296.405 17-210.700	0.1 lbs/MMBtu heat input ** 0.3 lbs/MMBtu heat input during Excess Emissions **
SO ₂	17-296.405	1.87 lbs/MMBtu heat input

* except for one two-minute period per hour of not more than 40% opacity

** Emissions of particulate matter shall not exceed 0.1 (normal operations) and 0.3 (during excess emissions) lbs/MMBtu heat input when firing fuel oil. No particulate matter limit shall apply when firing natural gas.

The excess emissions provisions of F.A.C. Rule 17-210.700 shall apply during periods of startup, shutdown and malfunctions.

PERMITTEE:
City of Tallahassee
Sam O. Purdom Power Plant

I.D. Number: 10TLH65000105,06,07
Permit/Certification Number: AO65-242831
Date of Issue: March 8, 1994
Expiration Date: March 1, 1999

SPECIFIC CONDITIONS:

5. Emissions tests for the following pollutants for each source shall be performed annually between July 1 and September 30, in accordance with the test methods and frequency indicated below, with notification to the Department 15 days prior to testing. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum heat input rate. The tests shall be conducted using the maximum fuel oil/natural gas ratio to be used during the subsequent operating year. For good cause, the Permittee may request an extension of a compliance test due date. However, inadequate planning of testing does not constitute good cause for an extension of the compliance test due date. The test report documentation must be submitted to the Department within 45 days after completion of testing.

Pollutant	Frequency	Test Method
VE*	Annually, during normal operation Annually, during excess emissions, when applicable	DEP 9 DEP 9
PM*,*1	Annually Annually, during excess emissions, when applicable	EPA 1, 2, 3 and 5, or 17 EPA 1, 2, 3 and 5, or 17

* shall be conducted using the maximum fuel oil to gas ratio in use during the current test year

*1 No particulate tests shall be required in any federal fiscal year in which the fossil fuel steam generator did not burn fuel oil for more than 400 hours, other than during startup.

The VE test shall be conducted during one of the P.M. test runs. Test reports shall comply with F.A.C. Rule 17-297.570, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 17-297.340(2).

6. If fueled 100% by oil the sulfur content of the oil shall not exceed 1.8% sulfur by weight. Records of fuel sulfur content shall be kept and made available for Department inspections.

7. Satisfactory ladders, platforms, and other safety devices as well as necessary parts shall be provided, maintained, and made available as necessary to facilitate compliance inspections.

8. An annual operation report [DEP Form 17-210.900(4) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the Permittee and used for future annual submittals.

PERMITTEE:
City of Tallahassee
Sam O. Purdom Power Plant

I.D. Number: 10TLH65000105,06,07
Permit/Certification Number: AO65-242831
Date of Issue: March 8, 1994
Expiration Date: March 1, 1999

SPECIFIC CONDITIONS:

9. In accordance with F.A.C. Rule 17-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 17-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the Permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

10. An application to renew this permit shall be submitted prior to December 31, 1998.

11. The permanent source identification number for these point sources are:

10TLH65000105 - Boiler 5
10TLH65000106 - Boiler 6
10TLH65000107 - Boiler 7

Please cite these numbers on all test reports and other correspondence specific to a permitted point source.

12. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, use telephone number (904) 444-8300 during normal working hours.

Expiration Date:

Issued this 8th day of March,
1994.

March 1, 1999

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794 • 904-436-8300

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Robert Kriegel, Deputy Assistant Secretary

PERMITTEE:

City of Tallahassee
Sam O. Purdom Plant

I.D. Number: 10TLH65000105
Permit/Certification Number: A065-159970
Date of Issue: March 3, 1989
Date of Modification: **MAR 16 1989**

Expiration Date: March 1, 1994
County: Wakulla
Latitude/Longitude: 30°09'30"N/84°12'00"
Section/Township/Range: 2/4S/1E
Project: Purdom Boiler #5

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Operation of Boiler #5, capacity 300 million Btu/hour heat input, fueled by natural gas and/or #6 fuel oil. Produces 220,000 pounds of steam per hour to run a 22,500 KW turbine-generator. Particulates are controlled by proper combustion control. Sulfur dioxide emissions are controlled by the sulfur content of fuel.

Located: East side of State Road 363 in St. Marks.

PERMITTEE:

City of Tallahassee
Sam O. Purdom Plant

I.D. Number: 10TLH65000105
Permit/Certification Number: A065-159970
Date of Issue: **MAR 03 1989**

Expiration Date: March 1, 1994

GENERAL CONDITIONS:

14. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

15. The maximum allowable heat input is 300 million Btu per hour. Compliance with standards shall be demonstrated while the source is operating within 10% of its rated capacity, provided however that testing may be conducted at less than 90% of rated capacity in which case the source's production rate shall be limited to 110% of the capacity at which the test was performed until additional compliance testing is performed.
16. An annual compliance test for particulate matter emissions using the maximum oil/gas fuel heat input ratio shall be conducted during each federal fiscal year (October 1 - September 30) except that such test shall not be required in any year in which the fossil fuel steam generator did not burn liquid fuel for more than 400 hours.
17. For excess emission limitations for particulate matter specified in Section 17-2.250, a compliance test shall be conducted annually while the source is operating under soot blowing conditions in any federal fiscal year during which soot blowing is part of normal source operation except that such test shall not be required in any fiscal year in which the fossil fuel steam generator did not burn liquid fuel more than 400 hours.
18. Annual compliance tests for particulate matter shall be conducted in accordance with EPA Methods 1, 2, 3, and 5 or 17. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.
19. Visible emissions tests (EPA Method 9) shall be conducted annually using the maximum oil/gas fuel ratio. Visible emissions shall not exceed 20% opacity under normal operation except for up to 2 minutes in any one hour at not more than 40% opacity.
20. Visible emissions tests (EPA Method 9) shall be conducted annually using the maximum oil/gas fuel ratio, under sootblowing conditions in any federal fiscal year during which soot blowing is part of normal source operation. Excess emissions resulting from boiler cleaning (soot blowing) and load change shall be permitted provided the duration of such excess emissions shall not exceed 3 hours in any 24 hour period and visible emissions shall not exceed 60% opacity.

PERMITTEE:
City of Tallahassee
Sam O. Purdom Plant

I.D. Number: 10TLH65000105
Permit/Certification Number: A065-159970
Date of Issue: March 3, 1989
Date of Modification: MAR 16 1989
Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:


21. Particulate emissions shall not exceed 0.10 pounds per million Btu heat input.
22. Particulate emissions shall not exceed 0.30 pounds per million Btu heat input, during soot blowing.
23. Sulfur dioxide emissions shall not exceed 1.87 pounds per million Btu of total heat input. If fueled 100% by oil the sulfur content of the oil shall not exceed 1.80%.
24. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1 of each year. The attached form shall be reproduced by the permittee and used for future annual submittals.
25. An application to renew this permit shall be submitted prior to January 1, 1994.
26. The permanent source identification number for this point source is 10TLH65000105. Please cite this number on all test reports and other correspondence specific to this permitted point source.

Expiration date:

Issued this 3rd day of March,
1989.

March 1, 1994

Date of Modification: MAR 16 1989
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


ROBERT V. KRIEGEL
Deputy Assistant Secretary



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794 • 904-436-8300

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Robert Krieger, Deputy Assistant Secretary

PERMITTEE:

City of Tallahassee
Sam O. Purdom Plant

I.D. Number: 10TLH65000106
Permit/Certification Number: A065-159971
Date of Issue: March 3, 1989
Date of Modification: **MAR 16 1989**

Expiration Date: March 1, 1994
County: Wakulla
Latitude/Longitude: 30°09'30"N/84°12'00"
Section/Township/Range: 2/4S/1E
Project: Purdom Boiler #6

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Operation of Boiler #6, capacity 300 million Btu/hour heat input, fueled by natural gas and/or #6 fuel oil. Produces 220,000 pounds of steam per hour to run a 22,500 KW turbine-generator. Particulates are controlled by proper combustion control. Sulfur dioxide emissions are controlled by the sulfur content of fuel.

Located: East side of State Road 363 in St. Marks.

PERMITTEE:

City of Tallahassee
Sam O. Purdom Plant

I.D. Number: 10TLH65000106
Permit/Certification Number: A065-159971
Date of Issue: **MAR 03 1989**

Expiration Date: March 1, 1994

GENERAL CONDITIONS:

14. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

15. The maximum allowable heat input is 300 million Btu per hour. Compliance with standards shall be demonstrated while the source is operating within 10% of its rated capacity, provided however that testing may be conducted at less than 90% of rated capacity in which case the source's production rate shall be limited to 110% of the capacity at which the test was performed until additional compliance testing is performed.

16. An annual compliance test for particulate matter emissions using the maximum oil/gas fuel heat input ratio shall be conducted during each federal fiscal year (October 1 - September 30) except that such test shall not be required in any year in which the fossil fuel steam generator did not burn liquid fuel for more than 400 hours.

17. For excess emission limitations for particulate matter specified in Section 17-2.250, a compliance test shall be conducted annually while the source is operating under soot blowing conditions in any federal fiscal year during which soot blowing is part of normal source operation except that such test shall not be required in any fiscal year in which the fossil fuel steam generator did not burn liquid fuel more than 400 hours.

18. Annual compliance tests for particulate matter shall be conducted in accordance with EPA Methods 1, 2, 3, and 5 or 17. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.

19. Visible emissions tests (EPA Method 9) shall be conducted annually using the maximum oil/gas fuel ratio. Visible emissions shall not exceed 20% opacity under normal operation except for up to 2 minutes in any one hour at not more than 40% opacity.

20. Visible emissions tests (EPA Method 9) shall be conducted annually using the maximum oil/gas fuel ratio, under sootblowing conditions in any federal fiscal year during which soot blowing is part of normal source operation. Excess emissions resulting from boiler cleaning (soot blowing) and load change shall be permitted provided the duration of such excess emissions shall not exceed 3 hours in any 24 hour period and visible emissions shall not exceed 60% opacity.

PERMITTEE:

City of Tallahassee
Sam O. Purdom Plant

I.D. Number: 10TLH65000106
Permit/Certification Number: A065-159971
Date of Issue: March 3, 1989
Date of Modification: **MAR 16 1989**
Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:

21. Particulate emissions shall not exceed 0.10 pounds per million Btu heat input.
22. Particulate emissions shall not exceed 0.30 pounds per million Btu heat input, during soot blowing.
23. Sulfur dioxide emissions shall not exceed 1.87 pounds per million Btu of total heat input. If fueled 100% by oil the sulfur content of the oil shall not exceed 1.80%.
24. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1 of each year. The attached form shall be reproduced by the permittee and used for future annual submittals.
25. An application to renew this permit shall be submitted prior to January 1, 1994.
26. The permanent source identification number for this point source is 10TLH65000106. Please cite this number on all test reports and other correspondence specific to this permitted point source.

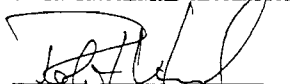
Expiration date:

March 1, 1994

Issued this 3rd day of March,
1989.

Date of Modification: **MAR 16 1989**

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


ROBERT V. KRIEGEL
Deputy Assistant Secretary



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794 • 904-436-8300

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Robert Krieger, Deputy Assistant Secretary

PERMITTEE:

City of Tallahassee
Sam O. Purdom Plant

I.D. Number: 10TLH65000107
Permit/Certification Number: A065-159972
Date of Issue: March 3, 1989
Date of Modification: **MAR 16 1989**

Expiration Date: March 1, 1994
County: Wakulla
Latitude/Longitude: 30°09'30"N/84°12'00"
Section/Township/Range: 2/4S/1E
Project: Purdom Boiler #7

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Operation of Boiler #7, capacity 621 million Btu/hour heat input, fueled by natural gas and/or #6 fuel oil. Produces 500,000 pounds of steam per hour to run a 44,000 KW turbine-generator. Particulates are controlled by proper combustion control. Sulfur dioxide emissions are controlled by the sulfur content of fuel.

Located: East side of State Road 363 in St. Marks.

PERMITTEE:

City of Tallahassee
Sam O. Purdom Plant

I.D. Number: 10TLH65000107
Permit/Certification Number: A065-159972
Date of Issue: **MAR 03 1989**
Expiration Date: March 1, 1994

GENERAL CONDITIONS:

14. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

15. The maximum allowable heat input is 621 million Btu per hour. Compliance with standards shall be demonstrated while the source is operating within 10% of its rated capacity, provided however that testing may be conducted at less than 90% of rated capacity in which case the source's production rate shall be limited to 110% of the capacity at which the test was performed until additional compliance testing is performed.

16. An annual compliance test for particulate matter emissions using the maximum oil/gas fuel heat input ratio shall be conducted during each federal fiscal year (October 1 - September 30) except that such test shall not be required in any year in which the fossil fuel steam generator did not burn liquid fuel for more than 400 hours.

17. For excess emission limitations for particulate matter specified in Section 17-2.250, a compliance test shall be conducted annually while the source is operating under soot blowing conditions in any federal fiscal year during which soot blowing is part of normal source operation except that such test shall not be required in any fiscal year in which the fossil fuel steam generator did not burn liquid fuel more than 400 hours.

18. Annual compliance tests for particulate matter shall be conducted in accordance with EPA Methods 1, 2, 3, and 5 or 17. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.

19. Visible emissions tests (EPA Method 9) shall be conducted annually using the maximum oil/gas fuel ratio. Visible emissions shall not exceed 20% opacity under normal operation except for up to 2 minutes in any one hour at not more than 40% opacity.

20. Visible emissions tests (EPA Method 9) shall be conducted annually using the maximum oil/gas fuel ratio, under sootblowing conditions in any federal fiscal year during which soot blowing is part of normal source operation. Excess emissions resulting from boiler cleaning (soot blowing) and load change shall be permitted provided the duration of such excess emissions shall not exceed 3 hours in any 24 hour period and visible emissions shall not exceed 60% opacity.

PERMITTEE:

City of Tallahassee
Sam O. Purdom Plant

I.D. Number: 10TLH65000107
Permit/Certification Number: A065-159972
Date of Issue: March 3, 1989
Date of Modification: MAR 16 1989
Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:

21. Particulate emissions shall not exceed 0.10 pounds per million Btu heat input.
22. Particulate emissions shall not exceed 0.30 pounds per million Btu heat input, during soot blowing.
23. Sulfur dioxide emissions shall not exceed 1.87 pounds per million Btu of total heat input. If fueled 100% by oil the sulfur content of the oil shall not exceed 1.80%.
24. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1 of each year. The attached form shall be reproduced by the permittee and used for future annual submittals.
25. An application to renew this permit shall be submitted prior to January 1, 1994.
26. The permanent source identification number for this point source is 10TLH65000107. Please cite this number on all test reports and other correspondence specific to this permitted point source.

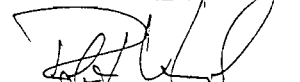
Expiration date:

March 1, 1994

Issued this 3rd day of March,
1989.

Date of Modification: MAR 16 1989

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



ROBERT V. KRIEGEL
Deputy Assistant Secretary



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

CT's 142

PERMITTEE: I.D. Number: 10TLH65000108,09
Permit/Certification Number: AO65-242827
City of Tallahassee Date of Issue: March 8, 1994
Sam O. Purdom Generating Station Modification Date: June 10, 1994
Modification Date: June 24, 1994
Expiration Date: March 1, 1999
County: Wakulla
Latitude/Longitude: 30°09'30"N\84°12'00"W
Project: Purdom Combustion Turbines 1 & 2

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of combustion turbines 1 and 2, manufactured by Westinghouse, model W171G, each with a heat input rate of 228 MMBtu/hour, fueled by natural gas or No. 2 fuel oil with a maximum of 0.4% sulfur. These turbines are used as peaking units during peak demand hours, during emergencies, and during controls testing; and each runs a nominal 12.3 MW generator.

Located on the east side of SR 363 in St. Marks, Wakulla County.

Specific Condition No. 2 establishes maximum operating and testing rates.

Specific Condition No. 4 establishes maximum allowable emission rates.

Specific Condition No. 5 establishes testing requirements.

Specific Condition No. 6 limits the sulfur content of the fuel oil.

Specific Condition No. 7 requires submission of an annual operation report.

Specific Condition No. 8 requires submission of a Major Air Pollution Source Annual Operation Fee Form.

Specific Condition No. 9 requires submission of a renewal permit application prior to December 31, 1998.

PERMITTEE:
City of Tallahassee

I.D. Number: 10TLH65000108,09
Permit/Certification Number: AO65-242827
Date of Issue: March 8, 1994
Modification Date: June 10, 1994
Modification Date: June 24, 1994
Expiration Date: March 1, 1999

SPECIFIC CONDITIONS:

- The attached General Conditions are part of this permit.
- The maximum allowable heat input rate per combustion turbine is 228 MMBtu/hour (LHV) at an ambient temperature of 80 degrees Fahrenheit. Testing of emissions shall be conducted at 95-100% of the permitted rated heat input based on the average ambient air temperature during the test. Data for correcting heat input rates (corrected for air temperatures other than 80 degrees Fahrenheit) must be submitted with the compliance test report. If it is impracticable to test at 95-100% of the maximum allowable heat input rate corrected for the average ambient air temperature, then sources may be tested at less than 95% of the maximum allowable heat input. If the source is tested at less than 95% of the maximum allowable heat input, subsequent source operation is limited to 110% of the tested heat input rate corrected for average ambient air temperature until a new test is conducted. Once the unit is so limited, then operation at higher capacity is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit with prior notification to the Department.

- The maximum hours of operation are 6993 hours/year for each turbine. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually.

- The maximum allowable emission rate for each pollutant is as follows:

Pollutant	FAC Rule	Allowable Emissions
VE	17-296.310(2)	less than 20% opacity

The excess emissions provision of F.A.C. Rule 17-210.700 shall apply during periods of startup, shutdown and malfunctions.

- Emissions tests for the following pollutants shall be performed annually between July 1 and September 30, in accordance with the test methods and frequency indicated, with notification to the Department 15 days prior to testing. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. For good cause, the Permittee may request an extension of a compliance test due date. However, inadequate planning of testing does not constitute good cause for an extension of the compliance test due date. The test report documentation must be submitted to the Department within 45 days after completion of testing.

Pollutant	Frequency	Test Method
VE	Annually	DEP 9

However, with the following exceptions, the visible emissions test shall only be required during those federal fiscal years during which the individual turbines operate greater than 400 hours.

- An initial VE test is required within 15 days of any use of fuel oil.
- A VE test is required in 1998 while operating on fuel oil.

PERMITTEE:
City of Tallahassee

I.D. Number: 10TLH65000108,09
Permit/Certification Number: AO65-242827
Date of Issue: March 8, 1994
Modification Date: June 10, 1994
Modification Date: June 24, 1994
Expiration Date: March 1, 1999

SPECIFIC CONDITIONS:

6. If fueled 100% by oil the sulfur content of the oil shall not exceed 0.4% sulfur by weight. Records of fuel oil sulfur content shall be kept and made available for Department inspections.

7. An annual operation report [DEP Form 17-210.900(4) enclosed] shall be submitted by March 1 each year. The enclosed form shall be reproduced by the Permittee and used for future annual submittals.

8. In accordance with F.A.C. Rule 17-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 17-213.900(11) enclosed] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The enclosed form shall be reproduced by the Permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

9. An application to renew this permit shall be submitted prior to December 31, 1998.

10. The permanent source identification numbers for these point sources are:

10TLH65000108 -- Combustion Turbine No. 1
10TLH65000109 -- Combustion Turbine No. 2

Please cite these numbers on all test reports and other correspondence specific to this permitted point source.

11. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, use telephone number (904) 488-3704 during normal working hours.

Expiration Date:

Modified this 24th day of June,
1994.

March 1, 1999

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794 • 904-436-8300

Hob Martinez, Governor

Dale Truitt, Secretary

John Stearns, Assistant Secretary
Robert Kriegel, Deputy Assistant Secretary

PERMITTEE:

City of Tallahassee
~~Frank B. Hopkins Plant~~

I.D. Number: 10TLH65000108 & 10TLH65000109
Permit/Certification Number: A065-159966
Date of Issue: MAR 03 1989

Expiration Date: March 1, 1994
County: Wakulla
Latitude/Longitude: 30°09'30"N/84°12'00"W
Section/Township/Range: 2/4S/1E
Project: Purdom Combustion Turbines #1 & 2

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Operation of combustion turbines #1 and #2, manufactured by Westinghouse. These are each model W171G, capacity 182 million Btu/hour heat input, fueled by natural gas or #2 fuel oil with a maximum of 0.4% sulfur. These are used as peaking units rated to each generate 12,300 KW of electricity.

Located: East side of SR 363 in St. Marks.

PERMITTEE:

City of Tallahassee

I.D. Number: 10TLH65000108 & 10TLH65000109
Permit/Certification Number: A065-159966
Date of Issue: March 3, 1989
Date of Modification: MAR 16 1989
Expiration Date: March 1, 1994

GENERAL CONDITIONS:

14. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

15. The maximum allowable heat input is 182 million Btu per hour each. Compliance with standards shall be demonstrated while the source is operating within 10% of its rated capacity, provided however that testing may be conducted at less than 90% of rated capacity in which case the source's production rate shall be limited to 110% of the capacity at which the test was performed until additional compliance testing is performed.

16. A visible emissions^{test} shall be conducted annually in any federal fiscal year. Tests shall be conducted in accordance with EPA Method 9 using #2 fuel oil.

17. The visible emissions test required in condition 16 shall be waived in federal fiscal years ending September 1989 - 1992 for any turbine that is not operated at least 400 hours during a specific year. The test due in 1993 prior to the end of September shall be conducted on each turbine regardless of the number of hours operated. These test results shall be submitted with the application for permit renewal prior to January 1, 1994. The two combustion turbines will be individually treated by all condition of this permit.

18. An annual operation report for each turbine (DER Form 17-1.202(6) attached) shall be submitted by March 1 each year. The attached forms shall be reproduced by the permittee and used for future annual submittals.

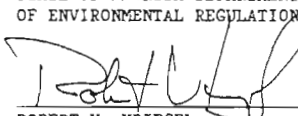
19. The permanent source identification numbers for these permit sources are: 10TLH65000108 Combustion Turbine #1 and 10TLH65000109 Combustion Turbine #2. Please cite the appropriate numbers on all test reports and other correspondence specific to one of these permitted point sources.

Expiration date:

Issued this 3rd day of March, 1989.

March 1, 1994

Date of Modification: MAR 16 1989
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


ROBERT V. KRIEGEL
Deputy Assistant Secretary

Memorandum

Florida Department of Environmental Protection

RECEIVED

177

MAR 01 1994

TO : Bobby A. Cooley, P.E.
THROUGH : Ed K. Middleswart, P.E.
FROM : Andy Allen, Bob Krieger
DATE : January 11, 1994
SUBJECT: Evaluation Summary for Operation Permit Application for Combustion Turbines nos. 1 & 2 for the Tallahassee Purdom Power Plant, Wakulla County; APIS nos. 10TLH65000108,09

Ed m 317

A065-242827

We recommend issuing an operation permit for Combustion Turbines 1&2 of the Purdom Power Plant for the City of Tallahassee.

Process Description This permit covers the operation of combustion turbines 1&2 at Tallahassee's Purdom Power Plant. These turbines are manufactured by Westinghouse, model W171G, each with a heat input capacity of 182 MMBtu/hr, and are fueled by natural gas or No. 2 fuel oil with a maximum of 0.4% sulfur. These turbines are used as peaking units during peak demand hours, and each produce 12.3 MW electricity.

Pollution Control Equipment Proper combustion and limiting the sulfur content of the fuel oil.

Applicable Rules & Regulations and Environmental Impact This source is regulated in accordance with FAC Rule 17-296.310 - General Particulate Emission Limiting Standards which includes a visible emissions limit of 20% opacity.

Table with 4 columns: Pollutant, FAC Rule, Allowable, Maximum Emissions tons/year. Rows include VE, PM, SO2, CO, NOx, TOC.

* (AP42 factor)X(maximum annual hours)

Compliance Monitoring Annual monitoring for VE when fuel oil (No. 2) use exceeds 400 hours per year.

Compliance History Acceptable.

Additional staff notes are attached.

RVK:bkc

To: Andy Allen
From: Bob Kriegel *BB*
Date: January 11, 1993

Re: Review notes for City of Tallahassee application A065-242827 for Purdom Combustion turbines 1&2; APIS nos 10TLH65000108 & 09; Wakulla County

This application was received December 23, 1993 for a renewal operating permit for the Purdom combustion turbines nos 1 and 2, previously permitted by A065-159966. These combustion turbines are manufactured by Westinghouse, model W171G, each with a heat input capacity of 182 MMBtu/hr, and are fueled by natural gas or no. 2 fuel oil with a maximum of 0.4% sulfur. These turbines are used as peaking units during peak demand hours, and each produce 12.3 MW electricity.

These sources were previously permitted by A065-159966, issued March 3, 1989 with an expiration date of March 1, 1994. Specific conditions of the permit included:

SC 15 - established a maximum allowable heat input and test rate of 182 MMBtu per turbine.

SC 16 - required annual visible emissions tests using no. 2 fuel oil.

SC 17 - Waived VE testing if individual turbines were not operated 400 hours/year

SC 18 - Required an annual operation report.

I am unaware of any source specific emission standards or NSPS standards that are applicable. The general VE standards in FAC Rule 17-296.310(2) limit VE to 20% opacity.

To summarize allowable and maximum emissions per year per combustion turbine:

<u>Pollutant</u>	<u>FAC Rule</u>	<u>Allowable Emissions</u>	<u>Maximum Emissions (tons per year)</u>
VE	17-296.310(2)	20% opacity	
PM			10.1 *
SO2			106.6 *
CO			12.7 *
NOX			185 *
TOC			4.5 *

* (AP42 factor)X(maximum annual hours)

The ambient air quality standard for NOX is 100ug/m annual arithmetic mean. The air quality standards for SO2 are: 1300ug/m, max 3 hour; 260 ug/m, max 24 hour; and 60 ug/m annual arithmetic mean. SO2 is slightly more conservative. Source modeling TSCREEN ver 1.2 indicates:

Combustion turbines 1&2 input (per turbine):

Input:

46.2 g/sec --- emissions (SO2)
 11.6m ----- stk height
 3.05m ----- stk dia
 708°K ----- stk exit temp
 25.5 m/s ----- stk exit vel

Output:

3 hour max -- 43.3 ug/m
 24 hour max - 19.3 ug/m
 annual ----- 3.9 ug/m

Even additively doubling these results in predicted ambient concentrations well below the ambient air quality standard for SO2 - and similarly for NOX.

A review of APIS test and operating reports indicates:

AIR050 (Annual Operating Reports)

<u>Source</u>	<u>Year</u>	<u>Date Rcvd</u>	<u>Operation</u> MM CuFt	<u>Hours opn</u>	
08	1992	04/14/93	13	69	
	1991	02/28/92	15	84	
	1990	02/26/91	10	56	
	1989	02/28/90	10	76	
09	1992	04/14/93	4	17	
	1991	02/28/92	15	108	
	1990	02/26/91	13	85	48,000 gal fuel oil
	1989	02/18/90	14	92	

AIR043 (VE)

None on file. However, specific condition 17 of the issued permits, eliminates testing requirements if the source is not operated at least 400 hours - with the exception of 1993 when both turbines are required to be tested and the test results submitted with the application prior to January, 1994.

A review of APIS and our test logs indicates the VE tests required for 1993 (the only tests required during this permit cycle) have not been submitted. However, the application included a 12/16/93 letter to Cooley referencing a letter dated September 17, 1993 and advising the tests had not been done due to the construction of smokeless combustor baskets and control panels. The City requested the test date by extended to June 1, 1994.

Since these units are operated primarily on natural gas, recommend we issue the

renewal operating permit, but require testing by June 1, 1994 or within 15 days of use of the no. 2 fuel oil.

**CITY OF TALLAHASSEE
 ELECTRIC DEPARTMENT
 ENVIRONMENTAL AFFAIRS OFFICE
 ROUTE 4, BOX 448
 TALLAHASSEE, FLORIDA 32304**



FAX COVER

Office: (904) 891-5890
 Fax: (904) 891-5899
 Office Hours: 7:30 AM - 4:00 PM

FROM: Jennette D. Curtis
TO: Robert Kriegel
DATE: June 24, 1994
Number of Pages (including cover sheet): 6

MESSAGE:

*Enclosed is the language (clarification) we discussed.
 Hopefully, these changes can be made prior to
 June 28, 1994. If you have any questions or further
 information is required pls do not hesitate to call us.*

Jennette Curtis

Receiving problems contact Kim



Lawton Chiles
Governor

Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

City of Tallahassee
Sam O. Purdom Generating Station

I.D. Number: 10TLH65000108,09
Permit/Certification Number: AO65-242827
Date of Issue: March 8, 1994
Modification Date: June 10, 1994
Expiration Date: March 1, 1999
County: Wakulla
Latitude/Longitude: 30°09'30"N\84°12'00"W
Project: Purdom Combustion Turbines 1 & 2

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of combustion turbines ^{rate} 1 and 2, manufactured by Westinghouse, model W171G, each with a heat input ^{capacity} of 228 MMBtu/hour, fueled by natural gas or No. 2 fuel oil with a maximum of 0.4% sulfur. These turbines are used as peaking units during peak demand hours ^{generator} and each produces 12.3 MW electricity. ^{generator}
~~during emergencies, and controls testing.~~ ^{runs a nominal}
Located on the east side of SR 363 in St. Marks, Wakulla County.

Specific Condition No. 2 establishes maximum operating and testing rates.

Specific Condition No. 4 establishes maximum allowable emission rates.

Specific Condition No. 5 establishes testing requirements.

Specific Condition No. 6 limits the sulfur content of the fuel oil.

Specific Condition No. 8 requires submission of an annual operation report.

Specific Condition No. 9 requires submission of a Major Air Pollution Source Annual Operation Fee Form.

Specific Condition No. 10 requires submission of a renewal permit application prior to December 31, 1998.

of file
(note, two commas!)

PERMITTEE:

City of Tallahassee

I.D. Number: 10TLH65000108,09
Permit/Certification Number: AO65-242827
Date of Issue: March 8, 1994
Modification Date: June 10, 1994
Expiration Date: March 1, 1999

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. The maximum allowable ^{at heat input} operating rate per combustion turbine is 228 MMBtu/hour (LHV) ~~corrected to~~ an ambient temperature of 80 degrees Fahrenheit. Testing of emissions shall be conducted at 95-100% of the permitted rated heat input based on the average ambient air temperature during the test. Data for correcting heat input rates (corrected for air temperatures other than 80 degrees Fahrenheit) must be submitted with the compliance test report. ~~If it is impracticable to test at capacity, then sources may be tested at less than capacity; if the source is tested at less than capacity subsequent source operation is limited to 110% of the test load until a new test is conducted.~~ Once the unit is so limited, then operation at higher capacity is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit with prior notification to the Department.
3. The maximum hours of operation are 6993 hours/year for each turbine. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually.
4. The maximum allowable emission rate for each pollutant is as follows:

ok
See ok Attachment A

<u>Pollutant</u>	<u>FAC Rule</u>	<u>Allowable Emissions</u>
VE	17-296.310(2)	less than 20% opacity

The excess emissions provision of F.A.C. Rule 17-210.700 shall apply during periods of startup, shutdown and malfunctions.

5. Emissions tests for the following pollutants shall be performed annually between July 1 and September 30, in accordance with the test methods and frequency indicated, with notification to the Department 15 days prior to testing. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. For good cause, the Permittee may request an extension of a compliance test due date. However, inadequate planning of testing does not constitute good cause for an extension of the compliance test due date. The test report documentation must be submitted to the Department within 45 days after completion of testing.

<u>Pollutant</u>	<u>Frequency</u>	<u>Test Method</u>
VE	Annually	DEP 9

However, with the following exceptions, the visible emissions test shall only be required during those federal fiscal years during which the individual turbines operate greater than 400 hours.

- An initial VE test is required within 15 days of any use of fuel oil.
- A VE test is required in 1998 while operating on fuel oil.



Lawton Chiles
Governor

Florida Department of Environmental Protection

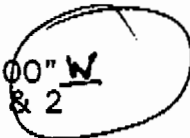
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

City of Tallahassee
Arvah B. Hopkins Plant

I.D. Number: 10TLH37000302,03
Permit/Certification Number: AO37-242824
Date of Issue: March 8, 1994
Modification Date: June 10, 1994
Expiration Date: March 1, 1999
County: Leon
Latitude/Longitude: 30°27'08"N/84°24'00"W
Project: Hopkins Combustion Turbines 1 & 2



This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of combustion turbines 1 and 2 at the Arvah B. Hopkins Plant. These turbines are manufactured by Westinghouse, model numbers W191G and W250G, with heat input rates of 228 and 446 MMBtu/hour respectively, and are fueled by natural gas or No. 2 fuel oil with a maximum of 0.4% sulfur. The turbines are used as peaking and emergency reserve units during peak demand hours and produce 16.47 and 26.8 MW generators, respectively.

1
during emergency
and controls
testing
(note
common)

Located on County Road 1585, approximately 1/2 mile north of State Road 20, one mile south of U.S. 90, and seven miles west of the State Capitol, in Tallahassee

- Specific Condition No. 2 establishes maximum operating and testing rates.
- Specific Condition No. 4 establishes maximum allowable emission rates.
- Specific Condition No. 5 establishes testing requirements.
- Specific Condition No. 6 limits the sulfur content of the fuel oil.
- Specific Condition No. 7 requires submission of an annual operation report.
- Specific Condition No. 8 requires submission of a Major Air Pollution Source Annual Operation Fee Form.
- Specific Condition No. 9 requires submission of a renewal permit application prior to December 31, 1998.

PERMITTEE:

City of Tallahassee
Arvah B. Hopkins Power Plant

I.D. Number: 10TLH37000302.03
Permit/Certification Number: AO37-242824
Date of Issue: March 8, 1994
Modification Date: June 10, 1994
Expiration Date: December 31, 1998

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.

2. The maximum allowable operating rate for Combustion Turbine 1 is 228 MMBtu/hour (LHV) heat input; for Combustion Turbine 2, 446 MMBtu/hour (LHV) ~~corrected to ambient temperature of 80 degrees Fahrenheit. Testing of emissions shall be conducted at 95-100% of the permitted rated heat input based on the average ambient air temperature during the test. Data for correcting heat input rates (corrected for temperatures other than 80 degrees Fahrenheit) must be submitted with the compliance test report. If it is impracticable to test at capacity, then sources may be tested at less than capacity; if the source is tested at less than capacity subsequent source operation is limited to 110% of the test load until a new test is conducted.~~ Once the unit is so limited, then operation at higher capacity is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit with prior notification to the Department.

OK
See Attachment A
OK

3. The maximum hours of operation are 8491 hours/year for Combustion Turbine 1, and 7071 hours/year for Combustion Turbine 2. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually.

4. The maximum allowable emission rate for each pollutant is as follows:

<u>Pollutant</u>	<u>FAC Rule</u>	<u>Allowable Emissions</u>
VE	17-296.310(2)	less than 20% opacity

5. Emissions tests for the following pollutants shall be performed annually between July 1 and August 31, in accordance with the test methods and frequency indicated, with notification to the Department 15 days prior to testing. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. For good cause, the Permittee may request an extension of a compliance test due date. However, inadequate planning of testing does not constitute good cause for an extension of the compliance test due date. The test report documentation must be submitted to the Department within 45 days after completion of testing.

<u>Pollutant</u>	<u>Frequency</u>	<u>Test Method</u>
VE	Annually	DEP 9

However, with the following exception, the visible emissions test shall only be required during those federal fiscal years during which the individual turbines operated greater than 400 hours.

A VE test is required in 1998 while operating on fuel oil.

PERMITTEE:

City of Tallahassee
Arvah B. Hopkins Power Plant

I.D. Number: 10TLH37000302,03
Permit/Certification Number: AO37-242824
Date of Issue: March 8, 1994
Modification Date: June 10, 1994
Expiration Date: December 31, 1998

SPECIFIC CONDITIONS:

~~6. The maximum sulfur content of the fuel oil is limited to 0.4% sulfur by weight. The Permittee shall maintain logs available for Department inspection of the fuel oil sulfur content. If fueled 100% by oil the sulfur content of the oil shall not exceed 0.4% sulfur by weight. Records of the fuel oil sulfur content shall be kept and made available for Department inspection.~~

~~7. Satisfactory ladders, platforms, and other safety devices as well as necessary parts shall be provided, maintained, and made available as necessary to facilitate compliance inspections.~~

7. ~~8.~~ An annual operation report [DEP Form 17-210.900(4) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the Permittee and used for future annual submittals.

8. ~~9.~~ In accordance with F.A.C. Rule 17-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 17-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the Permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

9. ~~10.~~ An application to renew this permit shall be submitted prior to December 31, 1998.

10. ~~11.~~ The permanent source identification number for these point sources are:

- 10TLH37000302 - Combustion Turbine ~~2~~ 1
- 10TLH37000303 - Combustion Turbine ~~3~~ 2

Please cite these numbers on all test reports and other correspondence specific to these permitted point sources.

11. ~~12.~~ The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, use telephone number (904) 488-3704 during normal working hours.

Expiration Date:

Issued this 10th day of June, 1994.

March 1, 1999

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director

Attachment A

If it is impracticable to test at ⁹⁵90-100% of the maximum allowable heat input rate corrected for the average ambient air temperature, then sources may be tested at less than ⁹⁵90% of the maximum allowable heat input. If the source is tested at less than ⁹⁵90% of the maximum allowable heat input, subsequent source operation is limited to ~~10~~10% of the tested heat input rate corrected for average ambient air temperature until a new test is conducted.

Section IV. This section is the Acid Rain Part.

Acid Rain Part, Phase II

Operated by: City of Tallahassee

ORIS code: 689

Effective:

The emissions unit listed below is regulated under Acid Rain Part, Phase II.

E.U.

ID No. Description

01 Boiler

1. The Acid Rain Part application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of this acid rain unit must comply with the standard requirements and special provisions set forth in the application listed below:

- a. DEP Form No. 62-210.900(1)(a), dated 07/01/95.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

2. Sulfur dioxide (SO₂) allowance allocations and nitrogen oxide (NO_x) requirements for each Acid Rain unit are as follows:

	Year	2000	2001	2002	2003
ID No. 01 7	SO₂ allowances, under Table 2, 3, or 4 of 40 CFR 73	438*	438*		
	NO_x limit	**	**		

*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.

**By January 1, 1999, this Part will be reopened to add NO_x requirements in accordance with the regulations implementing section 407 of the Clean Air Act.

3. Comments, notes, and justifications: None.

Section V. Attachments and relevant documents.

Acid Rain Application/Compliance Plan received 12/20/95.

Date: 8/14/96 4:43:54 PM
From: Carolyn Salmon PEN
Subject: City of Tallahassee-Purdom
To: Bruce Mitchell TAL

Bruce:

Jenny May (TBO) just completed the annual inspection of the Purdom plant. She didn't find any problems. I've reviewed the files and find the following:

On July 18, 1996, Mike Harley sent them a letter recommending that a Supply oil fuel flow meter for Unit 7 be certified pursuant to 40 CFR Part 75.

In December, 1995 they had some opacity problems with Combustion Turbine No. 2. They subsequently solved the problems and demonstrated compliance. I think mostly they tried this, then that, until it cleared up. Nothing specific was identified as causing the emission problem.

8-14-96

Jonathan,

F-4 I $\frac{1}{2}$ file. I sent her a "thank you" response.

Ben

RYB-8-13-97

Virus Scan

CITY OF TALLAHASSEE

PARDON UNIT 8 PROJECT

SUGGESTED TITLE V REVISIONS

8/12/97