Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 2, 1997

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

Re: PROPOSED Title V Permit No.: 1290001-001-AV
Sam O. Purdom Generating Station

Dear Ms. Adams:

One copy of the "PROPOSED PERMIT DETERMINATION" for the City of Tallahassee's Sam O. Purdom Generating Station, located at 667 Port Leon Drive, St. Marks, Wakulla County, is enclosed. A "Title V Permit Application Summary Form" is also enclosed.

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

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

Sincerely,

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

CHF/h

Enclosures

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

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 1290001-001-AV

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to City of Tallahassee, Electric Utilities for the Sam O. Purdom Generating Station, located at 667 Port Leon Drive, St. Marks, Wakulla County, was clerked on March 24, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the Tallahassee Democrat on April 24, 1997. The DRAFT Title V Air Operation Permit was available for public inspection at the Northwest District office in Pensacola, the Northwest District Branch Office in Tallahassee and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on April 30, 1997.

II. Public Comment(s).

Comments were received and the DRAFT Title V Operation Permit was changed. The comments were not considered significant enough to reissue the DRAFT Title V Permit and require another Public Notice. Comments were received from two respondents during the 30 (thirty) day public comment period. An additional comment/revision request was received after the comment period and was also addressed. Listed below is each comment that was received, in the chronological order of receipt, and a corresponding response to each of the comments.

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

General Comments

1. Comment:

Please add additional language in the permit to clarify that the "Permitting Notes" are not considered permit conditions nor are they federally enforceable.

Response:

A third paragraph is added to Section I., Subsection A., that reads as follows:

"The use of 'Permitting Notes' throughout this permit are for informational purposes, only, and are not permit conditions."

2. Comment:

In regards to the Department's use of "Not Federally Enforceable" to identify State-only requirements, our review has identified several additional permit conditions (Facility-Wide Condition 2., Emission Unit-Specific Conditions A.1., A.2., A.3., B.1., B.2., B.3., C.11., D.1., D.2., D.3., D.9., D.12., D.13., E.2., and E.3., and Appendix TV-1 Conditions 10., 12., 17. (F.A.C.), 54., 55. (F.A.C.), 56. (F.A.C.), and 57.) which should be listed in this manner.

Response:

These conditions have been researched and all current conditions that have not been flagged are either part of the State Implementation plan or a Federally Delegated Program, such as Title V. The above reference conditions will remain as noticed in the DRAFT.

Section I. Facility Information, Subsection A. Facility Description.

3. Comment:

Within the facility description, please insert the term "nominal" in front of the references to the capacities as is done within the emissions unit sections and remove the term "peaking units" from the description of the combustion turbines. In addition, please delete the entire sentence beginning with "Natural gas is the primary fuel..." since the Purdom Generating Station is authorized to fire natural gas and/or fuel oil.

Response:

It is agreed to add the word "nominal" as indicated. Even though the term "peaking units" is contained in the emission unit descriptions of your current operating permits and in the Title V operating permit application, we will agree to drop it from the emissions unit descriptions in the Title V operating permit. The sentence beginning with "Natural gas is the primary fuel...", will not be deleted, but will be changed as listed below.

As a result of this comment, the **Facility Description** is changed:

From:

"This facility consists of three fossil fuel-fired steam generators, two simple cycle combustion turbines (used as peaking units) and one auxiliary boiler. One of the steam generators, Boiler Number 7, is an Acid Rain Phase II Unit. The total combined electrical generating capacity from the facility is 112.6 megawatts (MW), of which, 88 megawatts are provided by the steam generators and 24.6 megawatts are provided by the combustion turbine peaking units. Natural gas is the primary fuel for the facility with various combinations of fuel oil used as "back-up" fuel. The auxiliary boiler is only used as a source of steam for plant operations when none of the other steam generating units are operating. Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities."

To:

"This facility consists of three fossil fuel-fired steam generators, two simple cycle combustion turbines and one auxiliary boiler. One of the steam generators, Boiler Number 7, is an Acid Rain Phase II Unit. The total combined electrical generating capacity from the facility is a nominal 112.6 megawatts (MW), of which a nominal 88 megawatts are provided by the steam generators and a nominal 24.6 megawatts are provided by the combustion turbines. The fuels used at this facility are natural gas and various combinations of fuel oil. The auxiliary boiler is only used as a source of steam for plant operations when none of the other steam generating units are operating. Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities."

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s)

4. Comment:

For the combustion turbines, please remove the term "Peaking Unit" and replace it with "(LHV)" to more accurately reflect the firing rate which is based on the lower heating value of the fuel. The "(LHV)" designation should also be applied to the maximum heat input rate for the combustion turbines in the Subsection D description and Condition D.1.

Response:

The requested changes will be made. See Response 3. above regarding "peaking units

As a result of this comment, the **Brief Descriptions** are changed:

From:
Regulated Emissions Units:

E.U. ID Number	Brief Description
-005	Boiler Number 5 - 300 MMBtu/hour
-006	Boiler Number 6 - 300 MMBtu/hour
-007	Boiler Number 7 - 621 MMBtu/hour (Acid Rain, Phase II Unit)
-008	Combustion Turbine Number 1 - 228 MMBtu/hour Peaking Unit
-009	Combustion Turbine Number 2 - 228 MMBtu/hour Peaking Unit
-011	Auxiliary Boiler

To: Regulated Emissions Units:

E.U. ID Number	Brief Description
-005	Boiler Number 5 - 300 MMBtu/hour
-006	Boiler Number 6 - 300 MMBtu/hour
-007	Boiler Number 7 - 621 MMBtu/hour (Acid Rain, Phase II Unit)
-008	Combustion Turbine Number 1 - 228 MMBtu/hour
-009	Combustion Turbine Number 2 - 228 MMBtu/hour
-011	Auxiliary Boiler

Also as a result of this comment, **Condition Number D.1.** is changed:

From:
D.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	MMBtu/hr Heat Input	Fuel Type
8	228	Natural Gas
	228	No. 2 Fuel Oil
9	228	Natural Gas
	228	No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

To:

D.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	MMBtu/hr Heat Input	Fuel Type
8	228 (LHV @ 80 degrees Fahrenheit)	Natural Gas
	228 (LHV @ 80 degrees Fahrenheit)	No. 2 Fuel Oil
9	228 (LHV @ 80 degrees Fahrenheit)	Natural Gas
	228 (LHV @ 80 degrees Fahrenheit)	No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Section II. Facility-wide Conditions

5. Comment:

Condition No. 6. relates to the general emission limiting standards for volatile organic compounds. The regulation requires the Department to deem necessary and order the appropriate vapor emission control devices and systems. Review of the permit condition and existing permits noted that the Department has not deemed necessary or ordered any such control devices or systems. If such systems are required at the facility please identify them within the condition. If no systems are required, we ask that the condition and the reference to the regulation be deleted.

Response:

Condition No. 6. is a quote of the rule, an applicable requirement and federally enforceable under the SIP. Although it must remain in the permit, we are agreeable to adding a permitting note for clarification.

As a result of this comment, **Condition Number 6.** is changed:

From:

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
[Rule 62-296.320(1)(a), F.A.C.]

To:

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
{Permitting Note: No vapor emission control devices or systems are deemed necessary nor ordered by the Department as of the issuance date of this permit.}
[Rule 62-296.320(1)(a), F.A.C.]

6. Comment:

Condition No. 8. relates to reasonable precautions to prevent emissions of unconfined particulate matter. Please eliminate condition 8.c. and revise condition 8.d. by deleting the second sentence beginning with "Additionally, water shall be...". A revised Attachment PGS-04 reflecting the requested changes are attached. The City also requests deletion of Condition 58 in Appendix TV-1 as Condition No. 8.d. addresses facility-wide conditions specific to the Purdom Generating Station.

Response:

The requested changes to Condition No. 8. will be made. However, Condition No. 58. of Appendix TV-1 is a quote of the rule, an applicable requirement, federally enforceable under the SIP, and will not be deleted.

As a result of this comment, **Condition Number 8.** is changed:

From:
"8. **Not federally enforceable**. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. The portable concrete mixer shall be operated on an as-needed basis. Reasonable precautions include enclosing the activity where practical.

b. Abrasive blasting activities that are associated with normal maintenance and corrosion control activities shall be enclosed where practical.

c. The aggregate storage piles that occur on a temporary basis in association with miscellaneous construction activities shall have water applied on an as-needed basis to control unconfined emissions from the handling and storage of these materials and the related construction activities.

d. Unconfined emissions associated with the limited on-site traffic shall be controlled by limiting vehicle speeds and unnecessary traffic within the plant grounds. Additionally, water shall be applied by the use of hoses (manual operation), as needed.

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

To:
"8. **Not federally enforceable**. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. The portable concrete mixer shall be operated on an as-needed basis. Reasonable precautions include enclosing the activity where practical.

b. Abrasive blasting activities that are associated with normal maintenance and corrosion control activities shall be enclosed where practical.

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

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

7. Comment:

Condition No. 9. relates to notifications in the event of an emergency. Please correct the phone number from "448-3704" to "488-3704."

Response:

The requested change will be made.

8. Comment:

Condition No. 11. relates to the requested modifications of the Purdom Generating Station associated with the Purdom Unit 8 Project under the Site Certification Application (SCA) submitted on March 7, 1997. Because the SCA includes several existing units, the City requests that this condition be revised to state only that the new combined cycle combustion turbine (Unit No. 8) and cooling tower are not authorized to be constructed or operated under the terms of the permit as issued.

Response:

The requested change will be made.

As a result of this comment, **Condition Number 11.** is changed:

From:
"11. **Not federally enforceable**. This permit does not provide any authorization for the construction or operation of any emissions units contained in the Florida Electrical Power Plant Siting Certification application received March 7, 1997.
[Rules 62-4.160 and 62-210.300(1) & (2), F.A.C.]"

To:
"11. **Not federally enforceable**. This permit does not provide any authorization for the construction or operation of the new combined cycle combustion turbine (Unit No. 8) and cooling tower that are contained in the Florida Electrical Power Plant Siting Certification application received March 7, 1997.
[Rules 62-4.160 and 62-210.300(1) & (2), F.A.C.]"

9. Comment:

Condition No. 12. requires sampling and analysis of the fuel oil in the storage tanks prior to the effective date of the permit. Please revise the condition to require sampling and analysis prior to receipt of the first fuel oil shipment, and no later than ten (10) days after the effective date of the permit.

Response:

The Department needs reasonable assurance as of the effective date of the permit that the conditions and limitations can be met. If we were to allow the testing to be delayed until ten days after the effective date of the permit, we could potentially be allowing an ambient air violation for those ten days plus the time required for the sample results to be returned. The Title V rules prohibit us from issuing a permit without proper assurances that the limitations can be met. Condition number 12 will remain as presented in the DRAFT permit.

Section III. Emissions Unit(s)
General

10. Comment:

Please revise the permit to clarify that Boilers Number 5, 6, and 7 may burn on-specification used oil generated by the City, as requested in the application. (Descriptions for Subsections A. and B., Conditions A. 1., A.3., A.11., B.1., and B.3.) .

Response:

The Department agrees to allow on-specification used oil to be combusted in Boiler Number 7.

As a result of this comment, **Condition Number B.1.** is changed:

From:
B.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	MMBtu/hr Heat Input	Fuel Type
7	621	Natural Gas
	621	No. 2 thru No. 6 fuel oil

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.]

To:
B.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	MMBtu/hr Heat Input	Fuel Type
7	621	Natural Gas
	621	No. 2 thru No. 6 Fuel Oil; On-Specification Used Oil

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.; and, Applicant's request.]

Also as a result of this comment, **Condition Number B.3.** is changed:

From:
B.3. Methods of Operation - Fuels. The only fuels allowed to be burned in this boiler are natural gas and/or new No. 2 thru No. 6 fuel oil.
[Rule 62-213.410, F.A.C.]

To:
B.3. Methods of Operation - Fuels. The fuels that are allowed to be burned in this boiler are natural gas and/or new No. 2 thru No. 6 fuel oil and/or on-specification used oil. (See Specific Condition B.24.)
[Rule 62-213.410, F.A.C.; and, Applicant's request.]

In addition, as a result of this comment, a new condition will be added to the end of this section under the heading of **Miscellaneous Conditions**.

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

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

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

b. Quantity Limitation: This emissions unit is permitted to burn "on-specification" used oil that is generated by the City of Tallahassee in the production and distribution of electricity, not to exceed 10,000 gallons during any consecutive 12 month period.

c. PCB Limitation: Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement.

d. Operational Requirements: On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.

e. Testing Requirements: The owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

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

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

f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department: [40 CFR 279.61 and 761.20(e)]

(1) The gallons of on-specification used oil generated and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
(2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
(3) Results of the analyses required above.

g. Reporting Requirements: The owner or operator shall submit to the Northwest District office, within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

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

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

11. Comment:

The City requests that the permit be revised to specify a 24-hour averaging period (block - midnight to midnight) for the heat input rates. In addition, the City requests that the permit clarify that heat input rates are to be determined based on the heating value of the fuels used (based on vendor data) and fuel flow meter data (Conditions A.1., B.1., C.4., D.1., and E.2.).

Response:

The maximum heat input rate is an hourly limit. If you decide to use vendor supplied heating values and calibrated fuel flow meter data for determining compliance, then the protocol must be able to demonstrate periods of compliance and noncompliance. Therefore, no change will be made.

12. Comment:

Condition Nos. A.5. and B.5. relate to the allowable visible emissions. Please delete the second sentence of these conditions to avoid confusion as the testing requirements from Chapter 62-297, F.A.C., are addressed under a separate condition.

Response:

Each condition is a quote of the rule and is, therefore, appropriate. Because of this, no change will be made.

13. Comment:

Condition Nos. A.6., A.8., B.6. and B.8. relate to allowable excess emissions. It is requested that these conditions be moved to a new common condition (suggested as No. C.4) to address the requirements of Rule 62-210.700(3), F.A.C.

Response:

The referenced conditions are specific emission limiting standards, as such, they are more appropriate under the "Emission Limits and Standards" section in each emissions unit subsection. Therefore, no change will be made.

14. Comment:

Condition Nos. C.15. and D.15. relate to the frequency of compliance testing. Please delete the phrase "(the Permittee has elected to conducted testing during July 1 - September 30)," since there is no regulatory basis for this requirement. Similarly, the Frequency Base Date column in Table 2-1 should be deleted.

Response:

Even though this language is contained in your current permits, we are agreeable to deleting it from the referenced conditions. The frequency base date column contained in Table 2-1 represents an agreement between the City of Tallahassee and the compliance section of the Northwest District office and changes can be negotiated with that office.

As a result of this comment, **Condition Nos. C.15.4. and D.15.4.** are changed:

From:
"4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit (**the Permittee has elected to conduct testing during July 1 - September 30**), the owner or operator of each emissions unit shall have a formal compliance test conducted for:"

To:
"4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:"

Subsection A

15. Comment:

Condition No. A.4. relates to the allowable hours of operation of the boilers. Please delete the second sentence of the conditions which requires an operations log since the unit is allowed to operate continuously.

Response:

For compliance determination and test applicability purposes, an operations log is required. An accurate record of the hours of operation of the equipment and the actual hours operated on each of the allowed fuels must be kept.

As a result of this comment, **Condition Number A.4.** is changed:

From:
"A.4. Hours of Operation. These emissions units may operate continuously, i.e. 8760 hours/year. The permittee shall maintain an operation log available for Department inspection certifying the total hours of operation.
[Rule 62-210.200(PTE), F.A.C.; and, AO65-242831, Specific Condition #3.]"

To:
"A.4. Hours of Operation. These emissions units may operate continuously, i.e. 8760 hours/year. The permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation, including a detailed account of the hours operated on each of the allowable fuels.
[Rule 62-210.200(PTE), F.A.C.; and, AO65-242831, Specific Condition #3.]"

Also as a result of this comment, **Condition Number B.4.** is changed:

From:
"B.4. Hours of Operation. This emissions unit may operate continuously, i.e. 8760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]"

To:
"B.4. Hours of Operation. This emissions unit may operate continuously, i.e. 8760 hours/year. The permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation, including a detailed account of the hours operated on each of the allowable fuels.
[Rule 62-210.200(PTE), F.A.C.; and, AO65-242831, Specific Condition #3.]"

16. Comment:

Condition No. A.10. relates to the requested sulfur dioxide limit on Boilers Number 5 and Number 6. The City requests that this condition be made federally enforceable through the Title V permit.

Response:

This limit can be made federally enforceable through the Title V permit, but the SIP limit must also remain in the permit since it is an applicable requirement. Be cautioned that the ability to use this lower limit for any future SIP related purpose is currently unknown.

As a result of this comment, **Condition Numbers A.9. and A.10.** are changed:

From:
A.9. Sulfur Dioxide. When burning liquid fuel, sulfur dioxide emissions shall not exceed 1.87 pounds per million Btu heat input , as measured by applicable compliance methods.
[Rule 62-296.405(1)(c)1.h., F.A.C.]

A.10. **Not federally enforceable.** Sulfur Dioxide. When burning liquid fuel, sulfur dioxide emissions shall not exceed 1.3 pounds per million Btu heat input, as measured by applicable compliance methods.
[Rule 62-204.240(1)(a), F.A.C.; and, requested by applicant in initial Title V permit application received June 14, 1996.]

To:
A.9. Sulfur Dioxide. When burning liquid fuel, sulfur dioxide emissions shall not exceed 1.87 pounds per million Btu heat input , as measured by applicable compliance methods. However, the permittee has requested a lower limit of 1.3 pounds per million Btu heat input, as measured by applicable compliance methods.
[Rules 62-296.405(1)(c)1.h. & 62-204.240(1)(a), F.A.C.; and, requested by applicant in initial Title V permit application received June 14, 1996.]

A.10. (Delete and renumber subsequent conditions accordingly.)

17. Comment:

Condition No. A.25. relates to the fuel oil storage tanks. Please modify the language to "No fuel oil shall be placed into the fuel oil storage tanks, which are connected by a single pipe-line at this time and used to supply fuel oil to Boilers Number 5, Number 6, and Number 7, that exceeds the sulfur limitation specified in specific condition A.11., above, until Boilers Number 5 and Number 6 are permanently shutdown or separate piping is installed."

Response:

The requested change will be made; also, additional language will be added to clarify the separate piping issue.

As a result of this comment, **Condition Number** A.25. is changed:

From:
"A.25. Fuel Oil Storage Tank and Piping Restrictions. No fuel oil shall be placed into the fuel oil storage tanks, which are connected by a single pipe-line and used to supply fuel oil to Boilers Number 5, Number 6 and Number 7, that exceeds the sulfur limitation specified in specific condition **A.11.**, above.
[Rule 62-4.070(3), F.A.C.]"

To:
"A.25. Fuel Oil Storage Tank and Piping Restrictions. No fuel oil shall be placed into the fuel oil storage tanks, which are connected by a single pipe-line at this time and used to supply fuel oil to Boilers Number 5, Number 6 and Number 7, that exceeds the sulfur limitation specified in specific condition **A.11.**, until Boilers Number 5 and Number 6 are permanently shutdown or separate piping is installed between the fuel oil storage tanks and Boilers 5 and 6 and Boiler 7.
[Rule 62-4.070(3), F.A.C.]"

Subsection B
Monitoring of Operations

18. Comment:

Please delete the references to the Manufacturer (Type), Model Number, and Serial Number of the monitors to avoid future confusion during site inspection. These provisions are not enforceable permit conditions and, as noted, are subject to change. In an effort to minimize the potential for misinterpretation of this language, the City requests that it be deleted.

Response:

The requested change will be made. The reference will be changed to just list the pollutants/parameters that are being monitored.

As a result of this comment, the **Permitting Note within the Monitoring of Operations section of Subsection B.** is changed:

From:
"{Permitting Note: In accordance with the Acid Rain Phase II requirements, the continuous monitors installed on this unit are as follows:

Pollutant/Parameter	Manufacturer (Type)	Model Number	Serial Number
Gas Fuel Flow	Superior (Orifice)	GHFA 8" 600RF	94128
Oil Fuel Flow	MicroMotion (Coriolis)	CFM200M342NV	319657
Oil Fuel Flow	MicroMotion (Coriolis)	EX122A	9210S0005062
NOx	Teco	42D	42D45683274
CO_2	Teco	41H	41H48548281

(Note that serial numbers are subject to change)
[Rules 62-214.320 and 62-214.330, F.A.C.; and, 40 CFR Part 75, Appendix D, Section 2.1.]}"

To:
"{Permitting Note: In accordance with the Acid Rain Phase II requirements, the following continuous monitors are installed on this unit: Gas Fuel Flow, Oil Fuel Flow, NO_x and CO_2.}

Subsection C. Common Conditions

19. Comment:

Condition No. C.8. relates to the monitoring requirements for sulfur dioxide. Please delete the references to specific conditions A.11. and B.10. to help prevent any possible confusion as to the applicability of these conditions.

Response:

The Department feels that these are important reference links that need to be maintained. Therefore, no change will be made.

20. Comment:

Between Condition Nos. C.9 and C.10, please add a new heading entitled "Compliance Test Requirements" for clarification purposes.

Response:

The requested change will be made.

21. Comment:

Condition No. C.11. relates the operating rates during compliance testing. Please revise this condition to clarify that fuel oil and natural gas may be co-fired during the annual compliance testing and that the units may co-fire up to 110 percent of the maximum co-firing percentage prior to re-testing at a higher percentage.

Response:

We understand that situations may arise where the permitted capacity may not be able to be reached if firing solely on fuel oil during periods of testing. Because the rule requires tests to be conducted between 90-100% of permitted capacity in order to avoid lowering the permitted capacity, we are agreeable to allowing the co-firing of fuels during the tests to the extent necessary to maintain current allowable conditions and still meet the standards.

As a result of this comment, a new condition will be added at the end of the common conditions section under the heading of **Miscellaneous Conditions**.

Add:

Miscellaneous Conditions

C.21. If particulate matter and visible emissions tests are required, the tests shall be conducted concurrently and shall be performed using the maximum fuel oil/natural gas ratio that can be fired while meeting the standards.
[Rule 62-4.070(3), F.A.C.; and, Applicant request dated April 25, 1997.]

Subsection D

22. Comment:

Condition No. D.4. relates to the allowable hours of operation of the combustion turbine. Please end the condition after the word "inspection" since the term "certifying" now has a specific regulatory meaning.

Response:

Based on the request, a rewording of the referenced condition will be made (refer to Response 15, above).

As a result of this comment, **Condition Number D.4.** is changed:

From:
"D.4. Hours of Operation. Each combustion turbine may operate 6993 hours per year. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AO65-242827, Specific Condition #3.]"

To:
"D.4. Hours of Operation. Each combustion turbine may operate 6993 hours per year. The permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation, including a detailed account of the hours operated on each of the allowable fuels.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AO65-242827, Specific Condition #3.]"

23. Comment:

Condition No. D.6. relates to the fuel oil sulfur content. The reference to specific condition "D.11" should be changed to "D.12."

Response:

The requested change will be made. The reference will be changed to D.12.

24. Comment:

Please delete condition D.15.(c) as it is not applicable to the combustion turbines.

Response:

The requested change will be made. Also, for consistency with Comment/Response 14., above, the statement about testing between July 1 and September 30, will be removed.

As a result of this comment, **Condition Number D.15.** is changed:

From:
"D.15. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
(a) General Compliance Testing.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to

obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit **(the permittee has elected to conduct testing during July 1 - September 30)**, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. Visible emissions, if there is an applicable standard;

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, AO65-242827, Specific Condition #5 (frequency).]"

To:

"D.15. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
   a. Visible emissions, if there is an applicable standard;
8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

[Rule 62-297.310(7), F.A.C.; and, AO65-242827, Specific Condition #5 (frequency).]"

Subsection E

25. Comment:

Condition No. E.1. relates to the auxiliary boiler's construction permit. Please rephrase the condition so that the construction permit is made a part of the Title V permit *only* until the unit has been constructed and compliance with its terms and conditions demonstrated. At that point, the terms and conditions contained in the Title V permit will become enforceable.

Response:

The terms and conditions of the construction permit are for the construction of the emissions unit, initial compliance requirements if any, and continued operation. However, certain conditions may become obsolete and impose no further requirements after construction is completed and can be addressed upon opening of the permit (i.e. renewal). Therefore, no changes will be made.

26. Comment:

Condition Nos. E.7. and E.11. relate to excess emissions for existing units. Because the auxiliary boiler is a "new" unit, these provisions are not applicable and should be deleted. In addition, Condition No. E.10. should be revised to include startup and shutdown conditions as provided under Rule 62-210.700(1), F.A.C.

Response:

The requested change will be made.

As a result of this comment, **Condition Numbers. E.7. and E.11.** will be deleted (and remaining conditions of this section will be renumbered accordingly) and **Condition Number E.10. (old)** is changed:

From:
"E.10. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]"

To:
"E.9. Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]"

Lists of Exempt (Appendix E-1) and Unregulated (Appendix U-1) Emissions Units and/or Activities

27. Comment:

Revised lists of exempt (Appendix E-1) and unregulated (Appendix U-1) emissions units and/or activities and PGS06 are attached. The revised lists reflect the following:

Appendix E-1

- Add a new Diesel Oil Tank associated with the Hydrant Main.
- Delete the Kerosene Tank.
- Add (1-7) Space Heaters.
- Revision to exempt emission No. 43. to reflect a change from (15) to (1-15).
- Add additional Laboratory emission units (Laboratory Equipment, Chemical Usage, and Vacuum Pump).

Appendix U-1

- The draft permit included fuel use limitations for the emergency generators and the general purpose internal combustion engines. Because these units have not been exempted but have instead been listed as "unregulated," the City requests that the fuel use limitations be deleted.
- Add a new Diesel-driven Pump associated with the Hydrant Main.

Response:

The requested changes will be made.

As a result of this comment, **Appendix E-1** is changed:

From:

Appendix E-1, List of Exempt Emissions Units and/or Activities.

City of Tallahassee, Electric Utilities — **DRAFT Permit No.:** 1290001-001-AV
Sam O. Purdom Generating Station — **Facility ID No.:** 1290001

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the

emissions from exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities:

Exempt Emissions Related to Combustion Turbine No. 1

1. Oil Vapor Extractor
2. Fuel Oil Piping
3. Lube Oil Tank

Exempt Emissions Related to Combustion Turbine No. 2

4. Oil Vapor Extractor
5. Fuel Oil Piping
6. Lube Oil Tank

Exempt Emissions Related to Steam Generator No. 5

7. Fuel Oil Piping
8. Hydrogen Gas Vents
9. Deareator Tank Vents
10. Oil Vapor Extractors
11. Lube Oil Tank (storage)
12. Lube/Fuel Oil Drip Pans
13. Noncondensable Gas Extractor

Exempt Emissions Related to Steam Generator No. 6

14. Fuel Oil Piping
15. Hydrogen Gas Vents
16. Deareator Tank Vents
17. Oil Vapor Extractors
18. Lube Oil Tank (storage)
19. Lube/Fuel Oil Drip Pans
20. Noncondensable Gas Extractor

Exempt Emissions Related to Steam Generator No. 7

21. Fuel Oil Piping
22. Hydrogen Gas Vents
23. Deareator Tank Vents
24. Oil Vapor Extractors
25. Lube Oil Tank (storage)
26. Lube/Fuel Oil Drip Pans
27. Noncondensable Gas Extractor

Fuel Farm

28. Fuel Oil Tank No. 1
29. Fuel Oil Tank No. 2
30. Fuel Oil Tank No. 3
31. Kerosene Tank

32. Waste Oil Tank
33. Distillate Oil Tank
34. Gasoline Tank
35. Diesel Oil Tank

Fuel Dispensing Operations

36. Truck Loading/Unloading (for items 29-33)
37. Truck Loading/Unloading for Distillate Oil Tank
38. Truck Loading/Unloading for Gasoline Tank
39. Fuel Dispensing Operations for Diesel Oil Tank
40. Barge Unloading Station
41. Truck Loading/Unloading Rack 1
42. Truck Loading/Unloading Rack 2

Fugitive VOC Emissions

43. (15) Parts Washers - Nonhalogenated Solvents

Fugitive PM_{10} Emissions

44. Paved Roads
45. Unpaved Roads
46. Heavy Construction Activities
47. Aggregate Handling & Storage

Laboratory

48. Laboratory Fume Hoods

49. Central Vacuum System

Maintenance Activities

50. Welding - Exempt per Rule 62-210.300(3)(a)16., F.A.C.

Plant Operations

51. Lube Oil Storage Tanks
52. Propane Storage Tanks

To:

Appendix E-1, List of Exempt Emissions Units and/or Activities.

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

DRAFT Permit No.: 1290001-001-AV
Facility ID No.: 1290001

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities:

Exempt Emissions Related to Combustion Turbine No. 1

1. Oil Vapor Extractor
2. Fuel Oil Piping
3. Lube Oil Tank

Exempt Emissions Related to Combustion Turbine No. 2

4. Oil Vapor Extractor
5. Fuel Oil Piping
6. Lube Oil Tank

Exempt Emissions Related to Steam Generator No. 5

7. Fuel Oil Piping
8. Hydrogen Gas Vents
9. Deareator Tank Vents
10. Oil Vapor Extractors
11. Lube Oil Tank (storage)
12. Lube/Fuel Oil Drip Pans
13. Noncondensable Gas Extractor

Exempt Emissions Related to Steam Generator No. 6

14. Fuel Oil Piping
15. Hydrogen Gas Vents
16. Deareator Tank Vents
17. Oil Vapor Extractors
18. Lube Oil Tank (storage)
19. Lube/Fuel Oil Drip Pans
20. Noncondensable Gas Extractor

Exempt Emissions Related to Steam Generator No. 7

21. Fuel Oil Piping
22. Hydrogen Gas Vents
23. Deareator Tank Vents
24. Oil Vapor Extractors
25. Lube Oil Tank (storage)
26. Lube/Fuel Oil Drip Pans
27. Noncondensable Gas Extractor

Fuel Farm

28. Fuel Oil Tank No. 1
29. Fuel Oil Tank No. 2
30. Fuel Oil Tank No. 3
31. Waste Oil Tank
32. Distillate Oil Tank
33. Gasoline Tank
34. Diesel Oil Tank
35. (New) Diesel Oil Tank Associated With the Hydrant Main

Fuel Dispensing Operations

36. Truck Loading/Unloading (for items 29-33)

37. Truck Loading/Unloading for Distillate Oil Tank
38. Truck Loading/Unloading for Gasoline Tank
39. Fuel Dispensing Operations for Diesel Oil Tank
40. Barge Unloading Station
41. Truck Loading/Unloading Rack 1
42. Truck Loading/Unloading Rack 2

Fugitive VOC Emissions

43. (1-15) Parts Washers - Nonhalogenated Solvents

Space Heaters

44. (1-7) Space Heaters

Fugitive PM_{10} Emissions

45. Paved Roads
46. Unpaved Roads
47. Heavy Construction Activities
48. Aggregate Handling & Storage

Laboratory

49. Laboratory Equipment
50. Chemical Usage
51. Vacuum Pumps
52. Laboratory Fume Hoods

53. Central Vacuum System

Maintenance Activities

54. Welding - Exempt per Rule 62-210.300(3)(a)16., F.A.C.

Plant Operations

55. Lube Oil Storage Tanks
56. Propane Storage Tanks

Also as a result of this comment, **Appendix U-1** is changed:

From:

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

City of Tallahassee, Electric Utilities — **DRAFT Permit No.:** 1290001-001-AV
Sam O. Purdom Generating Station — **Facility ID No.:** 1290001

Unregulated Emissions Units and/or Activities. An emissions unit which emits no "emissions-limited pollutant" and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

E.U. ID No.	Brief Description of Emissions Units and/or Activity
-010	Fugitive VOC Sources - Painting Operations
-xxx	General purpose engines
-yyy	Emergency generators

-010 Fugitive VOC emissions are generated from the painting operations associated with normal plant maintenance. SCC: 4-90-999-98, Miscellaneous Volatile Organic Compound Evaporation.

-xxx General purpose internal combustion engines with total fuel consumption limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.

Located at this source are the following general purpose gasoline powered internal combustion engines: (2) Welding Generators.

-yyy Emergency generators with total fuel consumption limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.

Located at this source for use are (3) Emergency Generators.

To:

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

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

DRAFT Permit No.: 1290001-001-AV
Facility ID No.: 1290001

Unregulated Emissions Units and/or Activities. An emissions unit which emits no "emissions-limited pollutant" and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

E.U. ID No.	Brief Description of Emissions Units and/or Activity
-010	Fugitive VOC Sources - Painting Operations
-xxx	General purpose engines
-yyy	Emergency generators

-010 Fugitive VOC Emissions. Fugitive VOC emissions are generated from the painting operations associated with normal plant maintenance. SCC: 4-90-999-98, Miscellaneous Volatile Organic Compound Evaporation.

-xxx General purpose internal combustion engines.
Located for use at this source are(2) Welding Generators.

-yyy Emergency generators.
Located for use at this source are (3) Emergency Generators.

Appendix TV-1, Title V Conditions (version dated 2/27/97)
Chapter 62-4, F.A.C.

35. Comment:

Please include Rule 62-4.040, F.A.C, within the list of applicable regulations.

Response:

Rule 62-4.040, F.A.C., was deleted from the list because it does not have facility-wide application, it requires a Departmental case-by-case evaluation prior to approval, and it is applicable at the emission unit and/or activity level. Therefore, no change will be made.

36. Comment:

Condition Nos. 11. and 16. relate to administrative procedures. Please revise these conditions to include mediation based on the Administrative Procedures Act under Chapter 120, Florida Statutes.

Response:

These conditions reflect the current version of the rules that we are operating under. Therefore, no changes will be made.

37. Comment:

Conditions 55. and 17. are identical; therefore, one should be deleted.

Response:

Because this condition is covered under two different rules, there were two entries purposefully included in Appendix TV-1. Therefore, no changes will be made to this appendix.

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

38. Comment:

In the "Standards" column, 60 percent opacity should be added for soot blowing and load changes for 3 hours/day for Boilers 5, 6, and 7. The opacity standard for the auxiliary boiler should be changed to "20%; 40% - 1 two min. period/hour" based on the Department's rules and the construction permit.

Response:

Table 1-1 is merely a summary of standard conditions for normal operations. The requested change to reflect 60 percent opacity corresponds to excess emissions, not normal conditions, so it will not be included in the table. The opacity standard for the auxiliary boiler will be changed as requested.

As a result of this comment, the auxiliary boiler portion of **Table 1-1, Summary of Air Pollutant Standards and Terms** is changed:

From:

-011	Auxiliary Boiler	VE	Natural Gas	2000	Less than 20%			N/A	N/A	62-296.406(1)	E.6.
		PM	Natural Gas	2000	N/A	N/A	N/A	N/A	N/A	62-296.406(2)	E.8.
		SO_2	Natural Gas	2000	N/A	N/A	N/A	N/A	N/A	62-296.406(3)	E.9.

To:

-011	Auxiliary Boiler	VE	Natural Gas	2000	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.406(1)	E.6.
		PM	Natural Gas	2000	N/A	N/A	N/A	N/A	N/A	62-296.406(2)	E.8.
		SO_2	Natural Gas	2000	N/A	N/A	N/A	N/A	N/A	62-296.406(3)	E.9.

39. Comment:

The City requests that a footnote be added regarding excess emission for startup, shutdown, and malfunctions, as appropriate, and the reference to 62-200 in the "Regulatory Citation" column should be changed to 62-210.

Response:

The requested footnote is not appropriate because the table is a summary of standard conditions/requirements for normal operations. The reference to 62-200.700(3) will be changed to 62-210.700(3).

As a result of this comment, the PM - SB section for Boiler #7 in **Table 1-1, Summary of Air Pollutant Standards and Terms** is changed:

From:

PM - SB	No. 2 - No. 6 F.O.	3 hr/day	0.3 lb/MMBtu	N/A	N/A	186.3	340.0	62-200.700(3)	B.8.
**	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	186.3	340.0	62-200.700(3)	B.8.

To:

PM - SB	No. 2 - No. 6 F.O.	3 hr/day	0.3 lb/MMBtu	N/A	N/A	186.3	340.0	62-210.700(3)	B.8.
**	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	186.3	340.0	62-210.700(3)	B.8.

Table 2-1, Summary of Compliance Requirements

40. Comment:

In the "Compliance Method" column, the particulate matter (PM) test method for Boilers 5 and 6 should be changed to include Methods 1, 2 and 3. In addition, for Boiler 7, Methods 5B; and 5F should be included.

Response:

The requested change is not necessary since Methods 1, 2 and 3 are required by the other methods. Methods 1, 2 and 3 will be deleted from the Compliance Method section for Boiler 7 and Methods 5B and 5F will be added.

As a result of this comment, the Compliance Method section of **Table 2-1, Summary of Compliance Requirements** is changed:

For Boiler 7, From:

"1, 2, 3 & 5, or 17"

To:

"17, 5, 5B or 5F"

41. Comment:

In the "Testing Time Frequency" column, the testing requirements for natural gas should be changed to "N/A." In addition, footnote 3 should be revised to clarify that PM testing is not required prior to renewal if oil is fired less than 400 hours during the prior year.

Response:

The "Testing Time Frequency" for natural gas should only be listed as "N/A" for VE testing. It should be listed as "Annually" for PM testing, except for the auxiliary boiler, which should be listed as "N/A". Footnote 3 is sufficient as it is. Again, these tables are only summaries of the permit conditions and for the most part, normal operations. Therefore, no changes will be made.

42. Comment:

In the column entitled "Min. Compliance Test Duration," the City requests the table be revised to clarify that the duration of the PM tests is the average of three one-hour runs instead of "60 minutes." In addition, the duration for visible emissions for the auxiliary boiler should be 60 rather than 30 minutes.

Response:

The column heading is "Min. Compliance Test Duration", not "Total Test Requirements". The minimum test duration as listed in the rule is "1 hour", not "60 minutes". The compliance test requires that three runs be performed. The test times and frequencies are dictated by rule and contained in the permit text. Therefore, the text should be referred to for full details, the table is only a summary. It is agreed that the duration for the VE test for the auxiliary boiler should be "60 minutes" since it is subject to a multi-valued VE standard. The apparent inconsistency between the VE test duration of "60 minutes" and the duration for all other tests of "1 hour" is part of the rule.

As a result of this comment, the "Min. Compliance Test Duration" column of **Table 2-1, Summary of Compliance Requirements** is changed:

From:

E. U. ID No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date [2]	Min. Compliance Test Duration
-005	Boiler No. 5	VE	No. 6 - No. 2 F.O.	DEP method 9	Annually [3]	7/1 - 9/30	60 Minutes
-006	Boiler No. 6		Natural Gas	DEP method 9	N/A	7/1 - 9/30	60 Minutes
		PM	No. 6 - No. 2 F.O.	17, 5, 5B or 5F	Annually [3]	7/1 - 9/30	60 Minutes
			Natural Gas	17, 5, 5B or 5F	Annually [3]	7/1 - 9/30	60 Minutes
		SO_2	No. 6 - No. 2 F.O.	Fuel Sampling & Analysis Provided by Vendor			
-007	Boiler No. 7 (Phase II, Acid Rain)	VE	No. 6 - No. 2 F.O.	DEP method 9	Annually [3]	7/1 - 9/30	60 Minutes
			Natural Gas	DEP method 9	N/A	7/1 - 9/30	60 Minutes
		PM	No. 6 - No. 2 F.O.	1, 2, 3 & 5, or 17	Annually [3]	7/1 - 9/30	60 Minutes
			Natural Gas	1, 2, 3 & 5, or 17	Annually [3]	7/1 - 9/30	60 Minutes
		SO_2	No. 2 - No. 6 F.O.	Fuel Sampling & Analysis Provided by Vendor and per Acid Rain Phase II Commitment			
-008	Combustion Turbine No. 1	VE	No. 2 F.O.	EPA Method 9	Annually [4]	7/1 - 9/30	30 Minutes
-009	Combustion Turbine o. 2		Natural Gas	EPA Method 9	Annually [4]	7/1 - 9/30	30 Minutes
		SO_2	No. 2 F.O.	Fuel Sampling & Analysis Provided by Vendor			
-011	Auxiliary Boiler	VE	Natural Gas	EPA Method 9	Renewal		30 Minutes
		PM	Natural Gas	N/A	N/A	N/A	N/A
		SO_2	Natural Gas	N/A	N/A	N/A	N/A

To:

E. U. ID No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date [2]	Min. Compliance Test Duration
-005	Boiler No. 5	VE	No. 2 - No. 6 F.O.	DEP method 9	Annually [3]	7/1 - 9/30	60 Minutes
-006	Boiler No. 6		Natural Gas	DEP method 9	N/A	7/1 - 9/30	60 Minutes
		PM	No. 2 - No. 6 F.O.	17, 5, 5B or 5F	Annually [3]	7/1 - 9/30	1 Hour
			Natural Gas	17, 5, 5B or 5F	Annually [3]	7/1 - 9/30	1 Hour
		SO_2	No. 2 - No. 6 F.O.	Fuel Sampling & Analysis Provided by Vendor			
-007	Boiler No. 7 (Phase II, Acid Rain)	VE	No. 2 - No. 6 F.O.	DEP method 9	Annually [3]	7/1 - 9/30	60 Minutes
			Natural Gas	DEP method 9	N/A	7/1 - 9/30	60 Minutes
		PM	No. 2 - No. 6 F.O.	1, 2, 3 & 5, or 17	Annually [3]	7/1 - 9/30	1 Hour
			Natural Gas	1, 2, 3 & 5, or 17	Annually [3]	7/1 - 9/30	1 Hour
		SO_2	No. 2 - No. 6 F.O.	Fuel Sampling & Analysis Provided by Vendor and per Acid Rain Phase II Commitment			
-008	Combustion Turbine No. 1	VE	No. 2 F.O.	EPA Method 9	Annually[4]	7/1 - 9/30	30 Minutes
-009	Combustion Turbine No. 2		Natural Gas	EPA Method 9	Annually[4]	7/1 - 9/30	30 Minutes
		SO_2	No. 2 F.O.	Fuel Sampling & Analysis Provided by Vendor			
-011	Auxiliary Boiler	VE	Natural Gas	EPA Method 9	Renewal		60 Minutes
		PM	Natural Gas	N/A	N/A	N/A	N/A
		SO_2	Natural Gas	N/A	N/A	N/A	N/A

B. Memo to file from Jonathan Holtom on May 9, 1997.

1. Comment:

Specific Condition E.1. was inadvertently changed from an earlier version of the DRAFT permit and needs to be changed back in order to read correctly.

As a result of this comment, **Condition Number E.1.** is changed:

From:

"Operation of the auxiliary boiler beyond the time frames established by permit number 1290001-002-AC is allowed. The conditions of this section apply only after the Department has received and verified a properly signed and sealed certification from the permittee's Professional Engineer stating that 1) the construction of the auxiliary boiler was completed in accordance with permit number 1290001-002-AC (issued December 5, 1996) and 2) the unit has properly demonstrated compliance with the terms and conditions contained therein."

To:

"Operation of the auxiliary boiler beyond the time frames established by permit number 1290001-002-AC is allowed, and the conditions of this section apply, only after the Department has received and verified a properly signed and sealed certification from the permittee's Professional Engineer stating that 1) the construction of the auxiliary boiler was completed in accordance with permit number 1290001-002-AC (issued December 5, 1996) and 2) the unit has properly demonstrated compliance with the terms and conditions contained therein."

C. Title V permit application revision request submitted by Robert E. McGarrah, dated and received June 24, 1997.

The City of Tallahassee requests the following revisions to the attached Specific Conditions be incorporated into the Title V Operating Permit:

Revision request 1.:

Specific Condition No. 2 - The condition requires that emissions testing be conducted at 95-100% of the permitted rated heat input based on the ambient air temperature during the test. Based on a guidance memo dated September 18, 1996 issued by the FDEP Division of Air Resources Management addressing rate of operation during compliance testing for combustion turbines, the City of Tallahassee requests that the portion of Specific Condition No. 2 which addresses the rate of operation during emissions testing be replaced by the following language:

"Testing of emissions shall be conducted with the source operating at capacity (maximum heat input rate for the inlet air temperature to the CT during the test). Capacity is defined as ~~90~~95-100 percent of the manufacturer's rated heat input achievable for the average ambient (or conditioned) air temperature during the test. If it is impracticable to test at capacity, then sources may be tested at less than capacity. In such cases, the entire heat input versus inlet temperature curve will be adjusted by the increment equal to the difference between the design heat input value and ~~110~~105 percent of the value reached during the test. Data, curves, and calculations necessary to demonstrate the heat input rate correction at both design and test conditions shall be submitted to the Department with the compliance test report".

Response:

Specific Condition No. 2 mentioned in the above request refers to Specific Condition No. 2 of existing air operation permit number AO65-242827. The Department agrees to the concept of the requested change, but will use standard language that has been developed and used in similar permits rather than the exact text included above.

As a result of this comment, **Condition Number D.13.** is changed:

From:

D.13. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rules 62-297.310(2) & (2)b., F.A.C.]

To:

D.13. **Not federally enforceable.** Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operating at permitted capacity, which is defined as 95-100 percent of the manufacturer's rated heat input achievable for the average ambient (or conditioned) air temperature during the test. If it is impracticable to test at capacity, then sources may be tested at less than capacity. In such cases, the entire heat input vs. inlet temperature curve will be adjusted by the increment equal to the difference between the design heat input value and 105 percent of the value reached during the test. Data, curves, and calculations necessary to demonstrate the heat input rate correction at both design and test conditions shall be submitted to the Department with the compliance test report.
[AO65-242827 Specific Condition No. 2; and, Applicant Request dated June 24, 1997.]

Revision Request 2.:

The City of Tallahassee has submitted additional segment pages to the original application to allow the evaporation of boiler chemical cleaning wastes.

Response:

Due to the relatively insignificant impact on emissions and the infrequent nature of this activity, we feel that the evaporation of boiler chemical cleaning wastes is most appropriately addressed in Appendix E-1, List of Exempt Emissions Units and/or Activities.

As a result of this revision request, **Appendix E-1, List of Exempt Emissions Units and/or Activities** is changed:

From:

Brief Description of Emissions Units and/or Activities:

Exempt Emissions Related to Combustion Turbine No. 1

1. Oil Vapor Extractor
2. Fuel Oil Piping
3. Lube Oil Tank

Exempt Emissions Related to Combustion Turbine No. 2

4. Oil Vapor Extractor
5. Fuel Oil Piping
6. Lube Oil Tank

Exempt Emissions Related to Steam Generator No. 5

7. Fuel Oil Piping
8. Hydrogen Gas Vents
9. Deareator Tank Vents
10. Oil Vapor Extractors
11. Lube Oil Tank (storage)
12. Lube/Fuel Oil Drip Pans
13. Noncondensable Gas Extractor

Exempt Emissions Related to Steam Generator No. 6

14. Fuel Oil Piping

15. Hydrogen Gas Vents
16. Deareator Tank Vents
17. Oil Vapor Extractors
18. Lube Oil Tank (storage)
19. Lube/Fuel Oil Drip Pans
20. Noncondensable Gas Extractor

Exempt Emissions Related to Steam Generator No. 7

21. Fuel Oil Piping
22. Hydrogen Gas Vents
23. Deareator Tank Vents
24. Oil Vapor Extractors

25. Lube Oil Tank (storage)
26. Lube/Fuel Oil Drip Pans
27. Noncondensable Gas Extractor

(...)

To:

Brief Description of Emissions Units and/or Activities:

Exempt Emissions Related to Combustion Turbine No. 1

1. Oil Vapor Extractor
2. Fuel Oil Piping
3. Lube Oil Tank

Exempt Emissions Related to Combustion Turbine No. 2

4. Oil Vapor Extractor
5. Fuel Oil Piping
6. Lube Oil Tank

Exempt Emissions Related to Steam Generator No. 5

7. Fuel Oil Piping
8. Hydrogen Gas Vents
9. Deareator Tank Vents
10. Oil Vapor Extractors
11. Lube Oil Tank (storage)
12. Lube/Fuel Oil Drip Pans
13. Noncondensable Gas Extractor
14. On-site Generated Non-hazardous Boiler Chemical Cleaning Wastes

Exempt Emissions Related to Steam Generator No. 6

15. Fuel Oil Piping
16. Hydrogen Gas Vents
17. Deareator Tank Vents
18. Oil Vapor Extractors
19. Lube Oil Tank (storage)
20. Lube/Fuel Oil Drip Pans
21. Noncondensable Gas Extractor
22. On-site Generated Non-hazardous Boiler Chemical Cleaning Wastes

Exempt Emissions Related to Steam Generator No. 7

23. Fuel Oil Piping
24. Hydrogen Gas Vents
25. Deareator Tank Vents
26. Oil Vapor Extractors
27. Lube Oil Tank (storage)
28. Lube/Fuel Oil Drip Pans
29. Noncondensable Gas Extractor
30. On-site Generated Non-hazardous Boiler Chemical Cleaning Wastes

(Remainder re-numbered accordingly)

(...)

D. Documents on file with the permitting authority:

-Letter received April 25, 1997, from Mr. Robert E. McGarrah.
-Memo to file dated May 9, 1997, from Mr. Jonathan Holtom.
-Letter received June 24, 1997, from Mr. Robert E. McGarrah.

III. Conclusion.

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

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

City of Tallahassee
Sam O. Purdom Generating Station
Facility ID No.: 1290001
Leon County

Initial Title V Air Operation Permit
PROPOSED Permit No.: 1290001-001-AV

Permitting Authority
State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344
Fax: 850/922-6979

Initial Title V Air Operation Permit

PROPOSED Permit No.: 1290001-001-AV

Table of Contents

Section Page Number

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

Permittee:
City of Tallahassee, Electric Utilities
300 South Adams Street
Tallahassee, Florida 32301

PROPOSED Permit No.: 1290001-001-AV
Facility ID No.: 1290001
SIC Nos.: **49**, 4911
Project: Initial Title V Air Operation Permit

This permit is for the operation of the Sam O. Purdom Generating Station. This facility is located at 667 Port Leon Drive, St. Marks, Wakulla County; UTM Coordinates: Zone 16, 769.5 km East and 3339.97 km North; Latitude: 30° 09' 47" North and Longitude: 84° 12' 10" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named 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 permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix E-1, List of Exempt Emissions Units and/or Activities
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Phase II Acid Rain Permit Application/Compliance Plan received December 20, 1995
Permit Number 1290001-002-AC
Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)
Appendix TV-1, Title V Conditions (version dated 2/27/97)

Effective Date: January 1, 1998
Renewal Application Due Date: July 5, 2002
Expiration Date: December 31, 2002

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/sms/jh

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of three fossil fuel-fired steam generators, two simple cycle combustion turbines and one auxiliary boiler. One of the steam generators, Boiler Number 7, is an Acid Rain Phase II Unit. The total combined electrical generating capacity from the facility is a nominal 112.6 megawatts (MW), of which a nominal 88 megawatts are provided by the steam generators and a nominal 24.6 megawatts are provided by the combustion turbines. The fuels used at this facility are natural gas and various combinations of fuel oil. The auxiliary boiler is only used as a source of steam for plant operations when none of the other steam generating units are operating. Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

The use of 'Permitting Notes' throughout this permit are for informational purposes, only, and are not permit conditions.

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

Regulated Emissions Units:

E.U. ID No.	Brief Description
-005	Boiler Number 5 - 300 MMBtu/hour
-006	Boiler Number 6 - 300 MMBtu/hour
-007	Boiler Number 7 - 621 MMBtu/hour (Acid Rain, Phase II Unit)
-008	Combustion Turbine Number 1 - 228 MMBtu/hour
-009	Combustion Turbine Number 2 - 228 MMBtu/hour
-011	Auxiliary Boiler

Unregulated emissions Units and/or Activities (See Appendix U-1):

E.U. ID No.	Brief Description
-010	Fugitive VOC Sources - Painting Operations
-xxx	General Purpose Engines
-yyy	Emergency Generators

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID Number(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The following documents are part of this permit:
Appendix E-1, List of Exempt Emissions Units and/or Activities
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Phase II Acid Rain Permit Application/Compliance Plan received December 20, 1995
Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)
Appendix TV-1, Title V Conditions (version dated 2/27/97)
Permit Number 1290001-002-AC
BACT Determination Dated October 8, 1996
ASP Number 97-B-01

{Permitting Note: The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.}

These documents are provided to the permittee for information purposes only:
Appendix H-1, Permit History / ID Number Changes
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers (version dated 2/5/97)
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements

These documents are on file with the permitting authority:
Initial Title V Permit Application Received June 14, 1996
Additional Information Request Dated September 26, 1996
Additional Information Response Received December 24, 1996
City of Tallahassee Letter Dated March 7, 1997
City of Tallahassee Letter Dated March 21, 1997
City of Tallahassee Letter Dated April 16, 1997
City of Tallahassee Letter Dated April 25, 1997
Jonathan Holtom Memo to file dated May 9, 1997
City of Tallahassee Letter Dated June 24, 1997

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendix TV-1, Title V Conditions (version dated 2/27/97), is a part of this permit.

{Permitting note: Appendix TV-1, Title V Conditions, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

3. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
   a. a risk management plan (RMP) when, and if, such requirement becomes applicable, and
   b. certification forms and/or RMPs according to the promulgated rule schedule.
[40 CFR 68]

4. Exempt Emissions Units and/or Activities. Appendix E-1, List of Exempt Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
{Permitting Note: No vapor emission control devices or systems are deemed necessary nor ordered by the Department as of the issuance date of this permit.}
[Rule 62-296.320(1)(a), F.A.C.]

7. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

8. **Not federally enforceable**. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. The portable concrete mixer shall be operated on an as-needed basis. Reasonable precautions include enclosing the activity where practical.

b. Abrasive blasting activities that are associated with normal maintenance and corrosion control activities shall be enclosed where practical.

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

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

9. **Not federally enforceable**. The Department's Northwest District Branch Office (Tallahassee) telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 488-3704, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 413-9911. The Department's Northwest District Office (Pensacola) telephone number for routine business, including compliance test notifications, is (904) 444-8364 during normal working hours.

10. **Not federally enforceable**. The permittee shall submit all compliance related notifications and reports required by this permit to the Department's Northwest District Office located at: 160 Governmental Center, Pensacola, Florida 32501-5794.

11. **Not federally enforceable**. This permit does not provide any authorization for the construction or operation of the new combined cycle combustion turbine (Unit No. 8) and cooling tower that are contained in the Florida Electrical Power Plant Siting Certification application received March 7, 1997.
[Rules 62-4.160 and 62-210.300(1) & (2), F.A.C.]

Miscellaneous

12. On or before the effective date of this permit (but no later than January 2, 1998) and after the last fuel oil delivery prior to the effective date of this permit, a one-time sample and analysis of the existing fuel oil in the storage tanks that provide fuel oil to Boilers Number 5, Number 6 and Number 7 is required to verify that all of the fuel oil sulfur content, percent by weight, is at or below that which is specified in specific condition A.11. Thereafter, compliance with the allowable fuel oil sulfur contents specified in this permit will be demonstrated by retaining the fuel oil vendor's delivery receipt providing the sulfur content, percent by weight, of the as-delivered fuel oil.
[Rule 62-213.440, F.A.C.]

Section III. Emissions Unit(s).

Subsection A. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-005	Boiler Number 5
-006	Boiler Number 6

These emissions units are Combustion Engineering steam generators designated as "Boiler Number 5" and "Boiler Number 6". Boiler Number 5 is tangentially fired. Each boiler is rated at a maximum heat input of 300 million Btu per hour (MMBtu/hour) while being fueled with natural gas and/or No. 2 thru No. 6 fuel oil. Each boiler nominally produces 220,000 pounds of steam per hour to run a nominal 22 megawatt (electric) turbine-generator (one each).

{Permitting notes: These units pre-date PSD regulations, but are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators With More Than 250 Million BTU per Hour Heat Input. Boiler Number 5 began commercial operation in 1958. Boiler Number 6 began commercial operation in 1961. Stack height = 125 feet, exit diameter = 13.0 feet, exit temperature = 344 °F, actual volumetric flow rate = 94,400 acfm. The exhaust from Boiler Number 5 and Boiler Number 6 share the same physical stack. Emissions from the boilers are uncontrolled.}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	MMBtu/hr Heat Input	Fuel Type
5	300	Natural Gas
	300	No. 2 thru No. 6 Fuel Oil
6	300	Natural Gas
	300	No. 2 thru No. 6 Fuel Oil

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **C.11.**
[Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation - Fuels. The only fuels allowed to be burned in these boilers are natural gas and/or new No. 2 thru No. 6 fuel oil.
[Rule 62-213.410, F.A.C.; and, Applicant Request dated June 24, 1997.]

A.4. Hours of Operation. These emissions units may operate continuously, i.e. 8760 hours/year. The permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation, including a detailed account of the hours operated on each of the allowable fuels.

[Rule 62-210.200(PTE), F.A.C.; and, AO65-242831, Specific Condition #3.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. Visible Emissions. Visible emissions shall not exceed 20 percent opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent. Emissions units governed by this visible emissions limit shall compliance test for particulate matter emissions annually and as otherwise required by Chapter 62-297, F.A.C.
[Rule 62-296.405(1)(a), F.A.C.]

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.
[Rule 62-210.700(3), F.A.C.]

A.7. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.
[Rule 62-296.405(1)(b), F.A.C.]

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.
[Rule 62-210.700(3), F.A.C.]

A.9. Sulfur Dioxide. When burning liquid fuel, sulfur dioxide emissions shall not exceed 1.87 pounds per million Btu heat input , as measured by applicable compliance methods. However, the permittee has requested a lower limit of 1.3 pounds per million Btu heat input, as measured by applicable compliance methods.
[Rules 62-296.405(1)(c)1.h. & 62-204.240(1)(a), F.A.C.; and, requested by applicant in initial Title V permit application received June 14, 1996.]

A.10. Sulfur Dioxide - Sulfur Content. The No. 2 thru No. 6 fuel oil sulfur content shall not exceed 1.20 percent, by weight. See specific condition **A.17.** and common condition **C.9.**
[Rule 62-296.405(1)(e)3., F.A.C.; and, requested in a letter by applicant dated March 21, 1997.]

A.11. This emissions unit is also subject to the conditions contained in **Subsection C. Common Conditions**, as specified below.

Excess Emissions

A.12. See common conditions **C.1. - C.3.**

Monitoring of Operations

A.13. Sulfur Dioxide. **The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery.** This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions **A.10., C.8. and C.9.**
[Rule 62-296.405(1)(f)1.b., F.A.C.]

A.14. Determination of Process Variables. See common condition **C.4.**

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.15. Visible Emissions. See common conditions **C.5., C.6. and C.16.**

A.16. Particulate Matter. See common conditions **C.7. and C.17.**

A.17. Sulfur Dioxide. See specific condition **A.13.** and common conditions **C.8. and C.9.**

A.18. Operating Rate During Testing. See common condition **C.11.**

A.19. Calculation of Emission Rate. See common condition **C.12.**

A.20. Applicable Test Procedures. See common condition **C.13.**

A.21. Required Stack Sampling Facilities. See common condition **C.14.**

A.22. Frequency of Compliance Tests. See common condition **C.15.**

Recordkeeping and Reporting Requirements

A.23. See common conditions **C.18. - C.20.**

Reasonable Assurances

A.24. Fuel Oil Storage Tank and Piping Restrictions. No fuel oil shall be placed into the fuel oil storage tanks, which are connected by a single pipe-line at this time and used to supply fuel oil to Boilers Number 5, Number 6 and Number 7, that exceeds the sulfur limitation specified in specific condition **A.10.**, until Boilers Number 5 and Number 6 are permanently shutdown or separate piping is installed between the fuel oil storage tanks and Boilers 5 and 6 and Boiler 7.
[Rule 62-4.070(3), F.A.C.]

Subsection B. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
-007	Boiler Number 7, (Phase II Acid Rain Unit)

This is a Riley Stoker Corporation model RX-33 steam generator designated as "Boiler Number 7". It is rated at a maximum heat input of 621 MMBtu/hour while being fueled with natural gas and/or No. 2 thru No. 6 fuel oil. It nominally produces 500,000 pounds of steam per hour to run a nominal 44 MW turbine-generator.

{Permitting notes: This emissions unit is regulated under Acid Rain, Phase II. This unit pre-dates PSD regulations, but is regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators With More Than 250 Million BTU per Hour Heat Input. Boiler Number 7 began commercial operation in 1966. Stack height = 180 feet, exit diameter = 9.0 feet, exit temperature = 300 °F, actual volumetric flow rate = 180,798 acfm. Emissions from this boiler are uncontrolled.}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	MMBtu/hr Heat Input	Fuel Type
7	621	Natural Gas
	621	No. 2 thru No. 6 Fuel Oil; On-Specification Used Oil

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.; and, Applicant's request.]

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **C.11.**
[Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation - Fuels. The fuels that are allowed to be burned in this boiler are natural gas and/or new No. 2 thru No. 6 fuel oil and/or on-specification used oil. (See Specific Condition **B.24.**)
[Rule 62-213.410, F.A.C.; and, Applicant Request dated June 24, 1997.]

B.4. Hours of Operation. This emissions unit may operate continuously, i.e. 8760 hours/year. The permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation, including a detailed account of the hours operated on each of the allowable fuels.
[Rule 62-210.200(PTE), F.A.C.; and, AO65-242831, Specific Condition #3.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}
B.5. Visible Emissions. Visible emissions shall not exceed 20 percent opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent. Emissions units governed by this visible emissions limit shall compliance test for particulate matter emissions annually and as otherwise required by Chapter 62-297, F.A.C.
[Rule 62-296.405(1)(a), F.A.C.]

B.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.
[Rule 62-210.700(3), F.A.C.]

B.7. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.
[Rule 62-296.405(1)(b), F.A.C.]

B.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.
[Rule 62-210.700(3), F.A.C.]

B.9. Sulfur Dioxide. When burning liquid fuel, sulfur dioxide emissions shall not exceed 1.87 pounds per million Btu heat input , as measured by applicable compliance methods.
[Rule 62-296.405(1)(c)1.h., F.A.C.]

B.10. Sulfur Dioxide - Sulfur Content. The No. 2 thru No. 6 fuel oil sulfur content shall not exceed 1.70 percent, by weight. See specific condition **B.17.** and common condition **C.9.**
[Rule 62-296.405(1)(e)3., F.A.C.; and, requested by applicant in a letter dated April 16, 1997.]

B.11. This emissions unit is also subject to the conditions contained in **Subsection C. Common Conditions**, as specified below.

Excess Emissions

B.12. See common conditions **C.1. - C.3.**

Monitoring of Operations

{Permitting Note: In accordance with the Acid Rain Phase II requirements, the following continuous monitors are installed on this unit: Gas Fuel Flow, Oil Fuel Flow, NO_x and CO_2.}

B.13. Sulfur Dioxide. **The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery.** This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions **B.10., C.8. and C.9.**
[Rule 62-296.405(1)(f)1.b., F.A.C.; and, requested by applicant in a letter dated April 16, 1997.]

B.14. Determination of Process Variables. See common condition **C.4.**

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.15. Visible Emissions. See common conditions **C.5., C.6.** and **C.16.**

B.16. Particulate Matter. See common conditions **C.7.** and **C.17.**

B.17. Sulfur Dioxide. See specific condition **B.13** and common conditions **C.8.** and **C.9.**

B.18. Operating Rate During Testing. See common condition **C.11.**

B.19. Calculation of Emission Rate. See common condition **C.12.**

B.20. Applicable Test Procedures. See common condition **C.13.**

B.21. Required Stack Sampling Facilities. See common condition **C.14.**

B.22. Frequency of Compliance Tests. See common condition **C.15.**

Recordkeeping and Reporting Requirements

B.23. See common conditions **C.18. - C.20.**

Miscellaneous Conditions.

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

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

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

b. Quantity Limitation: This emissions unit is permitted to burn "on-specification" used oil that is generated by the City of Tallahassee in the production and distribution of electricity, not to exceed 10,000 gallons during any consecutive 12 month period.

c. PCB Limitation: Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement.

d. Operational Requirements: On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.

e. Testing Requirements: The owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

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

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

f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department: [40 CFR 279.61 and 761.20(e)]

(1) The gallons of on-specification used oil generated and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
(2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
(3) Results of the analyses required above.

g. Reporting Requirements: The owner or operator shall submit to the Northwest District office, within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

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

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

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Subsection C. Common Conditions.

{Permitting Note: The following conditions are common to Boilers No. 5, 6 and 7, as specified in Subsections A and B, above, and to the auxiliary boiler as specified in Subsection E, below. They are placed here as a convenience and to avoid duplication.}

Excess Emissions

C.1. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

C.2. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.
[Rule 62-210.700(2), F.A.C.]

C.3. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

C.4. Determination of Process Variables.
(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

C.5. Visible Emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See specific condition **C.6.**
[Rule 62-296.405(1)(e)1., F.A.C.]

C.6. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
   a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
   b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.
[Rule 62-297.401, F.A.C.]

C.7. Particulate Matter. The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.
[Rules 62-296.405(1)(e)2. and 62-297.401, F.A.C.]

C.8. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee elected to demonstrate compliance by accepting a**

liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery. See specific conditions **A.10., B.10. and C.9.**
[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.; and, AO65-242831.]

C.9. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, or both ASTM D4057-88 and ASTM D129-91.
[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

Compliance Test Requirements

C.10. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.
[Rule 62-297.310(1), F.A.C.]

C.11. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rules 62-297.310(2) & (2)b., F.A.C.]

C.12. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.
[Rule 62-297.310(3), F.A.C.]

C.13. Applicable Test Procedures.
(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

    c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

TABLE 297.310-1
CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually	Spirometer or calibrated wet test or dry gas test meter	2%
	3. Check after each test series	Comparison check	5%

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.
[Rule 62-297.310(4), F.A.C.]

C.14. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.
[Rule 62-297.310(6), F.A.C.]

C.15. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid fuel for more than 400 hours other than during startup.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
   a. Did not operate; or
   b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
   a. Visible emissions, if there is an applicable standard;
   b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
   c. Each NESHAP pollutant, if there is an applicable emission standard.
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.
8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, AO65-242831, Specific Condition #5 (frequency).]

C.16. Visible Emissions Testing - Annual. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

a. only gaseous fuels; or
b. gaseous fuels in combination with any amount of liquid fuels for less than 400 hours per year; or
c. only liquid fuels for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

C.17 Particulate Matter testing - Annual and Permit Renewal. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

a. only gaseous fuels; or
b. gaseous fuels in combination with any amount of liquid fuels for less than 400 hours per year; or
c. only liquid fuels for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

Recordkeeping and Reporting Requirements

{Permitting Note: The reports that are required by the following conditions are to be sent to the Department of Environmental Protection's Northwest District Office, 160 Governmental Center, Pensacola, Florida 322501-5794}

C.18. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

C.19. Submit to the Department a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.
[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

C.20. Test Reports.
(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.

16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

Miscellaneous Conditions

C.21. If particulate matter and visible emissions tests are required, the tests shall be conducted concurrently and shall be performed using the maximum fuel oil/natural gas ratio that can be fired while meeting the standards.
[Rule 62-4.070(3), F.A.C.; and, Applicant request dated April 25, 1997.]

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Subsection D. This section addresses the following emissions units.

E.U. ID No.	Brief Description
-008	Combustion Turbine Number 1
-009	Combustion Turbine Number 2

These emissions units are simple cycle combustion turbines manufactured by Westinghouse (model number W171G) and are designated as "Combustion Turbine Number 1" and "Combustion Turbine Number 2". They are each rated at a maximum heat input of 228 million Btu per hour (MMBtu/hour) while being fueled by natural gas and/or No. 2 fuel oil. These combustion turbines are used as peaking units during peak demand times, during emergencies, and during controls testing, to run a nominal 12.3 MW generator (each). Emissions from the combustion turbines are uncontrolled.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. These units are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. Combustion Turbine Number 1 began commercial operation in 1963. Combustion Turbine Number 2 began commercial operation in 1963. Each combustion turbine has its own stack. Stack height = 38 feet, exit diameter = 10 feet, exit temperature = 880 °F, actual volumetric flow rate = 395,080 acfm.}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

D.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	MMBtu/hr Heat Input	Fuel Type
8	228 (LHV @ 80 degrees Fahrenheit)	Natural Gas
	228 (LHV @ 80 degrees Fahrenheit)	No. 2 Fuel Oil
9	228 (LHV @ 80 degrees Fahrenheit)	Natural Gas
	228 (LHV @ 80 degrees Fahrenheit)	No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

D.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **D.13.**
[Rule 62-297.310(2), F.A.C.]

D.3. Methods of Operation - Fuels. Only natural gas and/or new No. 2 fuel oil shall be fired in these turbines.
[Rule 62-213.410, F.A.C.]

D.4. Hours of Operation. Each combustion turbine may operate 6993 hours per year. The permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation, including a detailed account of the hours operated on each of the allowable fuels.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AO65-242827, Specific Condition #3.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

D.5. Visible Emissions. Visible emissions from each turbine shall not be equal to or greater than 20 percent opacity.
[Rule 62-296.320(4)(b)1., F.A.C.; and, AO65-242827.]

D.6. **Not federally enforceable.** Sulfur Dioxide - Sulfur Content. The sulfur content of the No. 2 fuel oil shall not exceed 0.4 percent, by weight. See specific condition **D.12.**
[AO65-242827; and, applicant request on initial Title V application received June 14, 1996.]

Excess Emissions

D.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

D.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

D.9. Sulfur Dioxide. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific conditions **D.6. and D.12.**
[Rule 62-213.440, F.A.C.]

D.10. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

D.11. Visible emissions. The test method for visible emissions shall be EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C.
[Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

D.12. Sulfur Content. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, or both ASTM D4057-88 and ASTM D129-91.
[Rules 62-213.440 and 62-297.440, F.A.C.]

D.13. **Not federally enforceable.** Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operating at permitted capacity, which is defined as 95-100 percent of the manufacturer's rated heat input achievable for the average ambient (or conditioned) air temperature during the test. If it is impracticable to test at capacity, then sources may be tested at less than capacity. In such cases, the entire heat input vs. inlet temperature curve will be adjusted by the increment equal to the difference between the design heat input value and 105 percent of the value reached during the test. Data, curves, and calculations necessary to demonstrate the heat input rate correction at both design and test conditions shall be submitted to the Department with the compliance test report.
[AO65-242827 Specific Condition No. 2; and, Applicant Request dated June 24, 1997.]

D.14. Applicable Test Procedures.

(a) Required Sampling Time.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2., F.A.C.]

D.15. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
   a. Did not operate; or
   b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
   a. Visible emissions, if there is an applicable standard;
8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

[Rule 62-297.310(7), F.A.C.; and, AO65-242827, Specific Condition #5 (frequency).]

D.16. Visible Emissions Testing - Annual. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

a. only gaseous fuels; or
b. gaseous fuels in combination with any amount of liquid fuels for less than 400 hours per year; or
c. only liquid fuels for less than 400 hours per year.

[Rules 62-297.310(7)(a)4. & 8., F.A.C.]

Recordkeeping and Reporting Requirements

{Permitting Note: The reports that are required by the following conditions are to be sent to the Department of Environmental Protection's Northwest District Office, 160 Governmental Center, Pensacola, Florida 322501-5794}

D.17. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

D.18. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

[Rule 62-297.310(8), F.A.C.]

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Subsection E. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-011	Auxiliary Boiler

This is a Kewanee model H3S-400-G steam generator rated at a maximum heat input of 16.74 MMBtu/hour while being fueled with natural gas.

{Permitting note(s): This emissions unit is regulated under 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. However, since it is only permitted to combust natural gas, the standards, the monitoring and the associated reporting requirements contained in Subpart Dc do not apply, with the exception that the reporting requirements pertaining to "start-up", as referenced in 40 CFR 60.7, do apply. This boiler may only operate when Boilers Number 5, Number 6 and Number 7 are not operating; therefore, there will be no significant increase in emissions for PSD purposes. Stack height = 30 feet, exit diameter = 2.0 feet, exit temperature = 420 °F, actual volumetric flow rate = 4,000 acfm (exit temperature and flow rate estimated by manufacturer service representative). Emissions from this boiler are uncontrolled.}

The following specific conditions apply to the emissions unit listed above:

E.1. All of the terms and conditions of permit number 1290001-002-AC are a part of this permit (see attachment 1290001-002-AC), except for the following changes to condition number 12:

Exception to Specific Condition Number 12. The Professional Engineer's certification that construction of the auxiliary boiler was completed according to the permit application and associated documents must be submitted to the Department within 105 days after achieving the maximum production rate at which the unit will be operated, but no later than 180 days after initial start-up of the emission unit.

Operation of the auxiliary boiler beyond the time frames established by permit number 1290001-002-AC is allowed, and the conditions of this section apply, only after the Department has received and verified a properly signed and sealed certification from the permittee's Professional Engineer stating that 1) the construction of the auxiliary boiler was completed in accordance with permit number 1290001-002-AC (issued December 5, 1996) and 2) the unit has properly demonstrated compliance with the terms and conditions contained therein.
[Rules 62-212.400(7)(b) and 62-213.420(1)(a)5., F.A.C.]

Essential Potential to Emit (PTE) Parameters

E.2. Permitted Capacity. The maximum operation heat input rate is as follows:

Unit No.	MMBtu/hr Heat Input	Fuel Type
11	16.74	Natural Gas

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.406, F.A.C.]

E.3. Emissions Unit Operating Rate Limitation After Testing. See common condition **C.11.**
[Rule 62-297.310(2), F.A.C.]

E.4. Methods of Operation - Fuels. Only natural gas shall be fired in this boiler.
[Rules 62-4.160(2) and 62-213.440(1), F.A.C.]

E.5. Hours of Operation. This emissions unit may operate 2,000 hours/year as an auxiliary source of steam, but may only operate when the existing steam generating units (Boilers Number 5, Number 6 and Number 7) are not operating. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation and fuel consumption annually.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; 1290001-002-AC; and, initial Title V permit application as amended December 24, 1996.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

E.6. Visible Emissions. Visible emissions shall not exceed 20 percent opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent.
[Rule 62-296.406(1), F.A.C.]

E.7. Particulate Matter. Particulate matter emissions shall be controlled by the firing of natural gas.
[Rule 62-296.406(2), F.A.C.; and, BACT determination dated October 8, 1996.]

E.8. Sulfur Dioxide. Sulfur dioxide emissions shall be controlled by the firing of natural gas.
[Rule 62-296.406(3), F.A.C.; and, BACT determination dated October 8, 1996.]

Excess Emissions

E.9. Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

E.10. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.
[Rule 62-210.700(2), F.A.C.]

Monitoring of Operations

E.11. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

E.12. This emissions unit is also subject to the conditions contained in **Subsection C. Common Conditions**, as specified below.

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

E.13. Visible Emissions. See common conditions **C.5. and C.6.**

E.14. Operating Rate During Testing. See common condition **C.11.**

E.15. Applicable Test Procedures. See common condition **C.13.(a)2.**

E.16. Frequency of Compliance Tests. See common condition **C.15. except (a)5. & 8.**

E.17. Visible Emissions - Annual. By this permit, annual emissions compliance testing for visible emissions is not required for this emissions unit.

[Rules 62-297.310(7)(a)4., F.A.C.]

Recordkeeping and Reporting Requirements

E.18. The permittee shall record and maintain records of the amount of natural gas combusted during each day the auxiliary boiler is operated.

[40 CFR 60.48c(g)]

E.19. See common conditions **C.18.** and **C.20.(a) & (b).**

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Section IV. Acid Rain Part.

Operated by: City of Tallahassee
ORIS Code: 689

Subsection A. This subsection addresses Acid Rain, Phase II.

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

E.U. ID No.	Description
-007	Boiler Number 7 - 621 MMBtu/hour

A.1. The Phase II Acid Rain Part application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these Phase II acid rain units 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, received December 20, 1995.

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

A.2. Sulfur dioxide (SO_2) allowance allocations and nitrogen oxide (NO_x) requirements for each Acid Rain unit are as follows:

E.U. ID No.	EPA ID	Year	2000	2001	2002
-007	7	SO_2 allowances, under Table 2, 3, or 4 of 40 CFR 73	438*	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.

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

A.3. Comments, notes, and justifications: None.

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Appendix E-1, List of Exempt Emissions Units and/or Activities.

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

PROPOSED Permit No.: 1290001-001-AV
Facility ID No.: 1290001

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities:

Exempt Emissions Related to Combustion Turbine No. 1

1. Oil Vapor Extractor
2. Fuel Oil Piping
3. Lube Oil Tank

Exempt Emissions Related to Combustion Turbine No. 2

4. Oil Vapor Extractor
5. Fuel Oil Piping
6. Lube Oil Tank

Exempt Emissions Related to Steam Generator No. 5

7. Fuel Oil Piping
8. Hydrogen Gas Vents
9. Deareator Tank Vents
10. Oil Vapor Extractors
11. Lube Oil Tank (storage)
12. Lube/Fuel Oil Drip Pans
13. Noncondensable Gas Extractor
14. On-site Generated Non-hazardous Boiler Chemical Cleaning Wastes

Exempt Emissions Related to Steam Generator No. 6

15. Fuel Oil Piping
16. Hydrogen Gas Vents
17. Deareator Tank Vents
18. Oil Vapor Extractors
19. Lube Oil Tank (storage)
20. Lube/Fuel Oil Drip Pans
21. Noncondensable Gas Extractor
22. On-site Generated Non-hazardous Boiler Chemical Cleaning Wastes

Appendix E-1, Continued.

Exempt Emissions Related to Steam Generator No. 7

23. Fuel Oil Piping
24. Hydrogen Gas Vents
25. Deareator Tank Vents
26. Oil Vapor Extractors
27. Lube Oil Tank (storage)
28. Lube/Fuel Oil Drip Pans
29. Noncondensable Gas Extractor
30. On-site Generated Non-hazardous Boiler Chemical Cleaning Wastes

Fuel Farm

31. Fuel Oil Tank No. 1
32. Fuel Oil Tank No. 2
33. Fuel Oil Tank No. 3
34. Waste Oil Tank
35. Distillate Oil Tank
36. Gasoline Tank
37. Diesel Oil Tank
38. (New) Diesel Oil Tank Associated With the Hydrant Main

Fuel Dispensing Operations

39. Truck Loading/Unloading (for items 29-33)
40. Truck Loading/Unloading for Distillate Oil Tank
41. Truck Loading/Unloading for Gasoline Tank
42. Fuel Dispensing Operations for Diesel Oil Tank
43. Barge Unloading Station
44. Truck Loading/Unloading Rack 1
45. Truck Loading/Unloading Rack 2

Fugitive VOC Emissions

46. (1-15) Parts Washers - Nonhalogenated Solvents

Space Heaters

47. (1-7) Space Heaters

Fugitive PM_{10} Emissions

48. Paved Roads
49. Unpaved Roads
50. Heavy Construction Activities
51. Aggregate Handling & Storage

Laboratory

52. Laboratory Equipment
53. Chemical Usage
54. Vacuum Pumps
55. Laboratory Fume Hoods

56. Central Vacuum System

Appendix E-1, Continued.

Maintenance Activities

57. Welding - Exempt per Rule 62-210.300(3)(a)16., F.A.C.

Plant Operations

58. Lube Oil Storage Tanks
59. Propane Storage Tanks

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Appendix U-1, List of Unregulated Emissions Units and/or Activities.

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

PROPOSED Permit No.: 1290001-001-AV
Facility ID No.: 1290001

Unregulated Emissions Units and/or Activities. An emissions unit which emits no "emissions-limited pollutant" and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

E.U. ID No.	Brief Description of Emissions Units and/or Activity
-010	Fugitive VOC Sources - Painting Operations
-xxx	General purpose engines
-yyy	Emergency generators

-010 Fugitive VOC Emissions. Fugitive VOC emissions are generated from the painting operations associated with normal plant maintenance. SCC: 4-90-999-98, Miscellaneous Volatile Organic Compound Evaporation.

-xxx General purpose internal combustion engines.
Located for use at this source are(2) Welding Generators.

-yyy Emergency generators.
Located for use at this source are (3) Emergency Generators.

Appendix H-1, Permit History/ID Number Changes

City of Tallahassee
Sam O. Purdom Generating Station

PROPOSED Permit No.: 1290001-001-AV
Facility ID No.: 1290001

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Extended Date[1,2]	Revised Date(s)
-001	Boiler #1	AO65-242828	3/25/94	3/1/99*		
-002	Boiler #2	AO65-242828	3/25/94	3/1/99*		
-003	Boiler #3	AO65-242828	3/25/94	3/1/99*		
-004	Boiler #4	AO65-242828	3/25/94	3/1/99*		
-005	Boiler #5	AO65-242831	3/8/94	3/1/99		
-006	Boiler #6	AO65-242831	3/8/94	3/1/99		
-007	Boiler #7	AO65-242831	3/8/94	3/1/99		
-008	Combustion Turbine #1	AO65-242827	3/8/94	3/1/99		6/10/94, 6/24/94
-009	Combustion Turbine #2	AO65-242827	3/8/94	3/1/99		6/10/94, 6/24/94
-011	Auxiliary Boiler	1290001-002-AC	12/5/96	12/31/97		
		BACT	10/8/96			

* Permit surrendered October 2, 1996.

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

From: **Facility ID No.**: 10TLH650001

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}

Referenced Attachments

Phase II Acid Rain Application/Compliance Plan

Appendix A-1, Abbreviations, Definitions, Citations, and Identification Numbers

Appendix SS-1, Stack Sampling Facilities (version dated 3/25/96)

Appendix TV-1, Title V Conditions (version dated 2/5/97)

Permit Number 1290001-002-AC

BACT Determination Dated October 8, 1996

ASP Number 97-B-01

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

Table 2-1, Summary of Compliance Requirements

Phase II Acid Rain Permit Application/Compliance Plan

(Refer to DRAFT Permit No. 1290001-001-AV)

Appendix A-1,
Abreviations, Definitions, Citations, and Identification Numbers
(Version Dated 2/5/97)

(Refer to DRAFT Permit No. 1290001-001-AV)

Appendix SS-1,
Stack Sampling Facilities (version dated 10/7/96)

(Refer to DRAFT Permit No. 1290001-001-AV)

Appendix TV-1,
Title V Conditions (version dated 2/27/97)

(Refer to DRAFT Permit No. 1290001-001-AV)

Permit Number 1290001-002-AC

(Refer to DRAFT Permit No. 1290001-001-AV)

BACT Determination Dated October 8, 1996

(Refer to DRAFT Permit No. 1290001-001-AV)

ASP Number 97-B-01

(Refer to DRAFT Permit No. 1290001-001-AV)

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

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

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

PROPOSED Permit No.: 1290001-001-AV
Facility ID No.: 1290001

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

E. U. ID No.	Brief Description	Pollutant Name	Fuel(s)	Hours/ Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See Permit Condition(s)
					Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
-005	Boiler #5 (300 MMBtu/hour)	VE	No. 6 - No. 2 F.O.	8760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5. & A.6.
-006	Boiler #6 (300 MMBtu/hour)		Natural Gas	8760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5. & A.6.
		PM	No. 6 - No. 2 F.O.	8760	0.1 lb/MMBtu	N/A	N/A	30.0	131.40	62-296.405(1)(b)	A.7.
			Natural Gas	8760	0.1 lb/MMBtu	N/A	N/A	30.0	131.40	62-296.405(1)(b)	A.7.
		PM - SB	No. 6 - No. 2 F.O.	3 hr/day	0.3 lb/MMBtu	N/A	N/A	90.0	164.25	62-210.700(3)	A.8.
		**	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	90.0	164.25	62-210.700(3)	A.8.
	(22 MW Turbine-generator)	SO_2	No. 6 - No. 2 F.O.	8760	1.3 lb/MMBtu	N/A	N/A	390.0	1,708.20	Applicant Request	A.10.
	(each unit)		Natural Gas	8760	N/A	N/A	N/A	N/A	N/A	62-296.405(1)(c)	A.10.
		% Sulfur	No. 6 - No. 2 F.O.	8760	max. sulfur content 1.20 %, by wt.			390.0	1,708.20	Applicant Request	A.11.
-007	Boiler #7 (621 MMBtu/hour)	VE	No. 6 - No. 2 F.O.	8760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	B.5.
	Acid Rain Phase II Unit		Natural Gas	8760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	B.5.
		PM	No. 6 - No. 2 F.O.	8760	0.1 lb/MMBtu	N/A	N/A	62.1	272.0	62-296.405(1)(b)	B.7.
			Natural Gas	8760	0.1 lb/MMBtu	N/A	N/A	62.1	272.0	62-296.405(1)(b)	B.7.
		PM - SB	No. 6 - No. 2 F.O.	3 hr/day	0.3 lb/MMBtu	N/A	N/A	186.3	340.0	62-210.700(3)	B.8.
		**	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	186.3	340.0	62-210.700(3)	B.8.
	(44 MW Turbine-generator)	SO_2	No. 6 - No. 2 F.O.	8760	1.87 lb/MMBtu	N/A	N/A	1,161.3	5,086.36	62-296.405(1)(c)1.h.	B.9.
			Natural Gas	8760	N/A	N/A	N/A	N/A	N/A	62-296.405(1)(c)	B.9.
		% Sulfur	No. 6 - No. 2 F.O.	8760	max. sulfur content 1.70%, by wt.			1,161.3	5,086.36	Applicant Request	B.10.
-008	Combustion Turbine No. 1	VE	No. 2 F.O.	6993	Less than 20%	N/A	N/A	N/A	N/A	62-296.320(4)(b)	D.5.
	(228 MMBtu/hour)		Natural Gas	6993	Less than 20%	N/A	N/A	N/A	N/A	62-296.320(4)(b)	D.5.
-009	Combustion Turbine No. 2	SO_2	No. 2 F.O.	6993	0.4% sulfur	N/A	N/A	97.4	340.6	AO65-242827	D.6.
	(228 MMBtu/hour)		Natural Gas	6993	N/A	N/A	N/A	N/A	N/A	N/A	N.A.
-011	Auxiliary Boiler	VE	Natural Gas	2000	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.406(1)	E.6.
		PM	Natural Gas	2000	N/A	N/A	N/A	N/A	N/A	62-296.406(2)	E.8.
		SO_2	Natural Gas	2000	N/A	N/A	N/A	N/A	N/A	62-296.406(3)	E.9.

Notes:
* The "Equivalent Emissions" listed are for informational purposes.
** PM - SB refers to "soot blowing" and "load change".

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Table 2-1, Summary of Compliance Requirements

Table 2-1, Summary of Compliance Requirements

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

PROPOSED Permit No.: 1290001-001-AV
Facility ID No.: 1290001

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

E. U. ID No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date [2]	Min. Compliance Test Duration	CMS [1]	See Permit Condition(s)
-005	Boiler No. 5	VE	No. 6 - No. 2 F.O.	DEP method 9	Annually [3]	7/1 - 9/30	60 Minutes	No	C.5., C.6., C.11., C.13., C.16.
-006	Boiler No. 6		Natural Gas	DEP method 9	N/A	7/1 - 9/30	60 Minutes	No	
		PM	No. 6 - No. 2 F.O.	17, 5, 5B or 5F	Annually [3]	7/1 - 9/30	1 Hour	No	C.7., C.10. - 15., C.17.
			Natural Gas	17, 5, 5B or 5F	Annually [3]	7/1 - 9/30	1 Hour	No	
		SO_2	No. 6 - No. 2 F.O.	Fuel Sampling & Analysis Provided by Vendor				No	C.8. & C.9.
-007	Boiler No. 7 (Phase II, Acid Rain)	VE	No. 6 - No. 2 F.O.	DEP method 9	Annually [3]	7/1 - 9/30	60 Minutes	No	C.5., C.6., C.11., C.13., C.16.
			Natural Gas	DEP method 9	N/A	7/1 - 9/30	60 Minutes	No	
		PM	No. 6 - No. 2 F.O.	17, 5, 5B or 5F	Annually [3]	7/1 - 9/30	1 Hour	No	C.7., C.10. - 15., C.17.
			Natural Gas	17, 5, 5B or 5F	Annually [3]	7/1 - 9/30	1 Hour	No	
		SO_2	No. 6 - No. 2 F.O.	Fuel Sampling & Analysis Provided by Vendor and per Acid Rain Phase II Commitment				No	C.8. & C.9. and Acid Rain Part
-008	Combustion Turbine No. 1	VE	No. 2 F.O.	EPA Method 9	Annually[4]	7/1 - 9/30	30 Minutes	No	D.13. - D.16.
-009	Combustion Turbine No. 2		Natural Gas	EPA Method 9	Annually[4]	7/1 - 9/30	30 Minutes	No	
		SO_2	No. 2 F.O.	Fuel Sampling & Analysis Provided by Vendor				No	D.9. & D.12.
-011	Auxiliary Boiler	VE	Natural Gas	EPA Method 9	Renewal		60 Minutes	No	E.15. - E.19.
		PM	Natural Gas	N/A	N/A	N/A	N/A	No	N/A
		SO_2	Natural Gas	N/A	N/A	N/A	N/A	No	N/A

Notes:

[1] CMS [=] continuous monitoring system.

[2] Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

[3] Test not required in years that fuel oil is fired less than 400 hours.

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

[electronic file name: 12900012.xls]