



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

SCOTT MADDOX  
Mayor  
STEVE MEISBURG  
Mayor Pro Tem

JOHN PAUL BAILEY  
Commissioner  
DEBBIE LIGHTSEY  
Commissioner  
RON WEAVER  
Commissioner

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

JAMES R. ENGLISH  
City Attorney  
RICARDO FERNANDEZ  
City Auditor

**HAND DELIVERED**

December 12, 1997

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

**RECEIVED**

**DEC 12 1997**

**BUREAU OF  
AIR REGULATION**

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

Dear Mr. Sheplak

On November 17, 1997, the Department of Environmental Protection forwarded a draft Proposed Permit Determination to the City of Tallahassee addressing comments to the Draft Title V Permit for the Sam O. Purdom Generating Station, dated October 13, 1997. In light of the immense number of initial Title V permits that have been and are currently being issued by the Bureau of Air Regulations, the City appreciates the attention and thoroughness provided in addressing our comments. As follow-up to the Department's draft Proposed Permit Determination, the City would like to clarify a few issues:

- In Section II.A. of the Proposed Permit Determination, the received date should read October 29, 1997 rather than April 25, 1997. Department representatives have indicated that this was a typographical error that should be corrected in the formal proposed version.
- In meetings with the Department, the City understands that Title V fees for units 5 and 6 should be based solely on the quantity of fuel oil consumed and the fuel oil sulfur content of the fuel oil fired. In those meetings Department representatives referenced a "guidance document" to substantiate this method of determining fees for units 5 and 6. However, the City has been unable to locate such guidance regarding Title V fee calculations, and therefore requests that the Department provide formal documentation confirming that fees for units 5 and 6 for sulfur dioxide emissions be based solely on fuel oil use and fuel oil sulfur concentrations and that no fees would be required for natural gas usage.

C:\files\msword\enviro\letters\1997\rmlt1210.doc

- The City maintains its contention that the requirement to monitor and record the quantities of used oil generated is an unnecessary burden that has no regulatory basis (40 CFR 279 or otherwise) and should not be required. We understand that industry has been pursuing resolution to the used oil issue, and we request that the City's Title V permits (both Hopkins and Purdom generating stations) be changed in accordance with any resolution developed.
- The City requests inclusion of the newest version of Appendix TV-1, dated December 2, 1997. The City requests that the Department reconsider its response contending that a change to Rule 62-213.430(6)(a) would be necessary.
- As an additional issue, in future correspondence, add Jennette Curtis' name to the list of copies furnished and replace Darrel Graziani's name with Doug Fulle (Address: Foster Wheeler Environmental Corporation, 302 Research Drive, Technology Park, Norcross, Georgia 30092-2925) on future correspondence pertaining to Title V permits;

Thank you for considering these issues. We look forward to hearing from you soon. If you have any questions, please call Jennette Curtis at 891-8850.

Sincerely,



Robert E. McGarrah  
Production Superintendent  
Title V Responsible Official

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