

THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**RECEIVED**

JUN 30 1997

BUREAU OF  
AIR REGULATION

In the Matter of an  
Application for Permit by:

OGC CASE NO. 97-0640

City of Tallahassee, Electric Utilities  
2602 Jackson Bluff Road  
Tallahassee, FL 32304

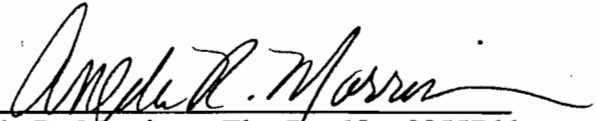
DRAFT Permit No.: 1290001-001-AV  
Sam O. Purdom Generating Station  
Wakulla County

**NOTICE OF WITHDRAWAL OF REQUEST  
FOR EXTENSION OF TIME**

The City of Tallahassee (Tallahassee) by and through undersigned counsel, hereby withdraws its Request for Extension of Time to file a petition for formal administrative proceedings or a request for mediation in accordance with Chapter 120, Florida Statutes. Tallahassee filed its third Request for Extension of Time on June 20, 1997, in response to the "Intent to Issue Title V Air Operation Permit" (Permit No. 1290001-001-AV) for the Sam. O. Purdom Generating Station located in Wakulla County, Florida, to negotiate certain changes in the draft Title V permit with the Department of Environmental Protection (Department). Tallahassee withdraws its Request because the Department has agreed to issue the permit with changes negotiated with Tallahassee, as reflected in the document received June 6, 1997, (Exhibit A) and revisions to that document received June 26, 1997, (Exhibit B).

Respectfully submitted this 27th day of June, 1997.

HOPPING GREEN SAMS & SMITH, P.A.

A handwritten signature in cursive script, reading "Angela R. Morrison". The signature is written in black ink and is positioned above a horizontal line.

Angela R. Morrison, Fla. Bar No. 0855766  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, FL 32314  
(904) 222-7500

Attorney for CITY OF TALLAHASSEE,  
ELECTRIC UTILITIES

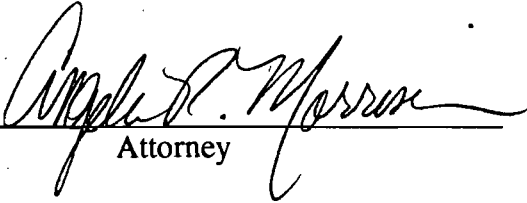
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following  
by U.S. Mail on this 27th day of June, 1997:

Clair H. Fancy, P.E.  
Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

Jeffrey Brown  
Office of General Counsel  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

Scott M. Sheplak, P.E.  
Administrator  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road, M.S. #5505  
Tallahassee, FL 32399-2400

  
\_\_\_\_\_  
Attorney



# Department of **DRAFT** Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

[DATE]

Ms. Gracy Danois  
U.S. EPA, Region 4  
61 Forsyth Street  
Atlanta, GA 30303

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

Dear Ms. Danois:

One copy of the "PROPOSED PERMIT DETERMINATION" for the 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 904/483-1344.

Sincerely,

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

CHF/h

Enclosures

Copy furnished to:  
Mr. Rob McGarrah, City of Tallahassee  
Mr. Karl Baur, P.E., City of Tallahassee  
Mr. Darrell Graziani, P.E., Foster-Wheeler  
Mr. Ed Middelswart, DEP, Northwest District Office  
Mr. Gerry Neubaur, DEP, Northwest District Branch Office

Exhibit A

# DRAFT

## PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 1290001-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. 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:**

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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."

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## 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:

See Response 3. above regarding "peaking units". The designation "(LHV)" will not be attached to the unit descriptions. The defined capacity represents as-fired fuel during normal operation and compliance testing.

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

### From:

#### 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 Peaking Unit
-009	Combustion Turbine Number 2 - 228 MMBtu/hour Peaking Unit
-011	Auxiliary Boiler

### To: 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

## 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

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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. Therefore, no change will be made.

## 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 No. 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.]"



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**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 No. 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 Title V permitting program is not a preconstruction emissions review program and, as such, may not be used to approve such types of requests. Therefore, no change will be made.

## 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:"

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## 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 No. 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 No. 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.

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## Response:

As discussed during the October 15, 1996, meeting between FDEP and the City of Tallahassee, this standard can not be made federally enforceable through the Title V permit because it conflicts with the SIP standard. Therefore, Condition No. A.10. will not be changed.

## 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 No. 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.

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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:

<u>Pollutant/Parameter</u>	<u>Manufacturer (Type)</u>	<u>Model Number</u>	<u>Serial Number</u>
Gas Fuel Flow	Superior (Orifice)	GHFA 8” 600RF	94128
Oil Fuel Flow	MicroMotion (Coriolis)	CFM200M342NV	319657
Oil Fuel Flow	MicroMotion (Coriolis)	EX122A	9210S0005062
NO <sub>x</sub>	Teco	42D	42D45683274
CO <sub>2</sub>	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<sub>x</sub> and CO<sub>2</sub>.}”

### 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.

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**Response:**

The referenced text is a direct quote of the Rule. Therefore, no change will be made.

**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 No. 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.

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As a result of this comment, **Condition No. 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).]”



# DRAFT

**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

# DRAFT

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 Nos. E.7. and E.11.** will be deleted (and remaining conditions of this section will be renumbered accordingly) and **Condition No. 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).

# DRAFT

## 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  
Sam O. Purdom Generating Station

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

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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<sub>10</sub> Emissions

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

48. Laboratory  
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<sub>10</sub> 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  
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 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.

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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.



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**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 <sub>2</sub>	Natural Gas	2000	N/A	N/A	N/A	N/A	N/A	62-296.406(3)	E.9.

# DRAFT

**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 <sub>2</sub>	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"

# DRAFT

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:

# DRAFT

From:

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

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To:

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

# DRAFT

**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. 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.

**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.



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

June 26, 1997

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

RE: Final Comments Pertaining to the DRAFT Title V Permit for Purdom Generating Station  
Permit/Project Number 1290001-001-AV

Dear Mr. McGarrah:

As a result of our meeting to discuss the Department's responses to your comments regarding the DRAFT Title V permit for the Purdom plant, several of our original responses have been changed and/or clarified.

Attached, please find the comments that were discussed in the meeting and our modified/clarified responses. In addition, our responses to your revision requests submitted on June 24 are also included. These changes will be incorporated into the final comments and revisions that will alter the "DRAFT" permit into the "PROPOSED" permit that will be sent to EPA for review.

Should you have any comments or questions regarding the attached revised responses, please call me or Jonathan Holtom at (904) 488-1344.

Sincerely,

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

Attachment

SMS/jh

Exhibit B

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

*Printed on recycled paper.*

# DRAFT

## 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 referenced conditions will remain as noticed in the DRAFT.

### Revised Response:

Several of the above conditions were further questioned for flagging as "Not Federally Enforceable" (i.e. heat input, fuel types, etc.). Title V requires that the permits contain enough information to adequately demonstrate compliance with the applicable standards. All of the conditions that can be flagged as "Not Federally Enforceable" are already flagged. The original response remains, no changes will be made as a result of this comment.

## 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:

See Response 3. above regarding "peaking units". The designation "(LHV)" will not be attached to the unit descriptions. The defined capacity represents as-fired fuel during normal operation and compliance testing.

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



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**From:**

Regulated Emissions Units:

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-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

<u>No.</u>	<u>Brief Description</u>
-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

**Revised Response:**

The requested changes will be made.

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

**From:**

Regulated Emissions Units:

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-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

# DRAFT

**To: Regulated Emissions Units:**

**E.U. ID**

<b><u>No.</u></b>	<b><u>Brief Description</u></b>
-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 (LHV)
-009	Combustion Turbine Number 2 - 228 MMBtu/hour (LHV)
-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:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
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:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
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.]

**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.

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**Response:**

Condition No. 6. is a quote of the rule, an applicable requirement and federally enforceable under the SIP. Therefore, no change will be made.

**Revised 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.]

**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 Title V permitting program is not a preconstruction emissions review program and, as such, may not be used to approve such types of requests. Therefore, no change will be made.

**Revised Response:**

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

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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:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
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:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
7	621	Natural Gas
	621	No. 2 thru No. 6 Fuel Oil; On-Specification Used Oil (See Specific Condition B.[X].)

[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.

[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.X. 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

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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.

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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.]

## 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:

As discussed during the October 15, 1996, meeting between FDEP and the City of Tallahassee, this standard can not be made federally enforceable through the Title V permit because it conflicts with the SIP standard. Therefore, Condition No. A.10. will not be changed.

## Revised 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.)

## 21. Comment:

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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:**

The referenced text is a direct quote of the Rule. Therefore, no change will be made.

**Revised 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. **Not Federally Enforceable**. 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.

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 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

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input versus 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".

## 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.



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**Response:**

The department is agreeable to allowing the evaporation of on-site generated boiler chemical cleaning wastes in these boilers.

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

**Add:**

C.22. Boiler chemical cleaning waste generated on-site and determined to be non-hazardous in accordance with 40 CFR 261, Subpart C-Characteristics of Hazardous Waste & Subpart D-Lists of Hazardous Waste (as tested pursuant to 40 CFR 261 Appendix I (COLIWASA) or other appropriate FDEP approved Comprehensive Quality Assurance Plan sampling technique) may be injected in small quantities, not to exceed 50 gallons per minute, into an operating fossil fuel fired boiler. During the injection process, the boiler's operating temperature must be maintained and best operational practices to minimize excess emissions must be taken.

[Applicant Request dated June 24, 1997.]