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HAND-DELIVERED

April 25, 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**

APR 25 1997

BUREAU OF  
AIR REGULATION

**RE: Draft Title V Permit No.: 1290001-001-AV  
Sam O. Purdom Generating Station  
Comments and 4<sup>th</sup> Revision to Application**

Dear Mr. Sheplak

The City of Tallahassee received the Department of Environmental Protection's draft Title V permit for the Sam O. Purdom Generating Station on March 25, 1997, and additional "replacement pages" on April 18, 1997. The City appreciates the diligent efforts of the Bureau of Air Regulation in reviewing the application and issuing the draft permit. The draft permit reflects a significant effort by you and your staff in compiling applicable requirements from existing permits as well as from state and federal regulations. In reviewing the draft permit, the City has identified clarifications that appear warranted and that we believe would be helpful. These clarifications are in addition to the fuel oil sulfur content limit requested by the City in a letter dated April 16, 1997, and as reflected in the replacement pages received on April 18, 1997. All of the City's additional comments have been compiled in an attachment to this letter, along with revised pages from the Sam O. Purdom Generating Station Title V Permit Application (original submitted on June 14, 1996; 1<sup>st</sup> revision submitted on December 20, 1996; 2<sup>nd</sup> revision submitted on March 21, 1997; 3<sup>rd</sup> revision submitted on April 16, 1997) addressing those comments (revised Attachment PGS-04 and Attachment PGS-06). The City has also included the Responsible Official's Certification and the marked-up draft permit pages reflecting the City's comments and changes to the application.

The City appreciates the Bureau's cooperation and assistance in this Title V permitting process, and we remain hopeful that all of the issues that have been identified can be resolved within the next few weeks without the need for a formal administrative hearing. To ensure adequate time for this resolution, the City has requested a sixty-day extension of time within which to submit a request for formal administrative proceedings

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or mediation (until June 5, 1997). We understand that the Department has agreed to this extension. In an effort to reach a timely resolution of the issues in advance of this deadline, the City requests that you and your staff review and consider the comments being submitted with this letter and respond to us in writing within the next week or two. In addition, if you and your staff would like to discuss these issues in more detail or if you have questions regarding this submittal, please call us to schedule a meeting at your earliest convenience.

We want to continue to work with the Department to ensure that the final permit is timely issued, and we believe that the issues that have been identified can be resolved without the need for a hearing. In fact, as stated above, a great majority of the comments in the attached document are quite minor—primarily for clarification purposes. The City's more significant concerns, in addition to the fuel oil sulfur content limit requested in a letter submitted by the City dated April 16, 1997, include attached comments regarding burning of on-spec used oil, cofiring during compliance testing, federal enforceability of permit conditions, and clarification of averaging periods for the heat input rates.

Thank you for considering the City's comments and for your continued cooperation. We look forward to hearing from you soon. If you have any questions or would like to schedule a meeting to discuss the issues identified, 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  
Jennette Curtis, COT  
Karl Bauer, COT  
Darrel Graziani, FWE

**City of Tallahassee  
Sam O. Purdom Generating Station  
Draft Title V Permit**

**General Comments**

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

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.

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

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.

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

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.

**Section II. Facility-wide Conditions**

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.

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.

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

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.

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.

### **Section III. Emissions Unit(s)**

#### **General**

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).

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).

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.

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.

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.

#### **Subsection A**

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.

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.

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."

### **Subsection B** **Monitoring of Operations**

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.

### **Subsection C. Common Conditions**

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.

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

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 cofired during the annual compliance testing and that the units may cofire up to 110 percent of the maximum cofiring percentage prior to re-testing at a higher percentage.

### **Subsection D**

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.

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

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

## Subsection E

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.

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.

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

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.

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

### Chapter 62-4, F.A.C

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

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.

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

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

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.

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.

**Table 2-1, Summary of Compliance Requirements**

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.

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.

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.

As part of the Title V application development, the City of Tallahassee reviewed the potential sources of unconfined particulate emissions at its Purdom Generating Station. The intent of the review was to ensure that reasonable precautions were in place to prevent and/or control these potential particulate emissions. The potential sources which were identified included the following:

1. Concrete mixing;
2. Abrasive blasting
3. Aggregate handling and storage;
4. Heavy construction activities;
5. Driving on paved/unpaved roads; and
6. Spray application of surface coatings.

Based on the City of Tallahassee's review of these potential sources, the following reasonable precautions have been established to control unconfined emissions of particulate matter:

- The portable concrete mixer is operated on an as-needed basis. Reasonable precautions include enclosing the activity wherever practical.
- The abrasive blasting activities are associated with normal maintenance and corrosion control activities. These activities are also enclosed wherever practical.
- ~~The aggregate storage piles occur on a temporary basis and are associated with miscellaneous construction activities. Water is applied on an as-needed basis to control unconfined emissions from the handling and storage of aggregate materials and the related construction activities.~~
- ~~Unconfined emissions associated with the limited on-site traffic are controlled through limiting vehicle speeds and unnecessary traffic within the plant grounds, and application of water as needed by the use of hoses (manual operation).~~

The spray applications of surface coatings are associated with normal maintenance and corrosion activities. These activities are enclosed whenever practical



CITY OF TALLAHASSEE ELECTRIC DEPARTMENT				
EMISSIONS UNIT INVENTORY				
SOURCE - PURDOM GENERATING STATION				
Unit No.	Emissions Unit	Emissions Unit Description	Regulatory (1) (2) Classification	Emission Unit Status
1	CT #1	Combustion Turbine - 228 mmBtu/hr	Regulated -Permit # AO37-242825	Existing
1a	Oil Vapor Extractor	Oil Vapor Extractor	Exempted Under Rule 62-213.430(6)	Existing
1b	Fuel Oil Piping	Fuel Oil Piping	Exempted Under Rule 62-213.430(6)	Existing
1c	Lube Oil Tank	Organic Liquid Storage	Exempted Under Rule 62-213.430(6)	Existing
2	CT #2	Combustion Turbine - 228 mmBtu/hr	Regulated -Permit # AO37-242825	Existing
2a	Oil Vapor Extractor	Oil Vapor Extractor	Exempted Under Rule 62-213.430(6)	Existing
2b	Fuel Oil Piping	Fuel Oil Piping	Exempted Under Rule 62-213.430(6)	Existing
2c	Lube Oil Tank	Organic Liquid Storage	Exempted Under Rule 62-213.430(6)	Existing
3	Steam Generator No. 5	Steam Generator - 300 mmBtu/hr	Regulated -Permit # AO37-242831	Existing
3a	Fuel Oil Piping	Fuel Oil Piping	Exempted Under Rule 62-213.430(6)	Existing
3b	Hydrogen Gas Vents	Hydrogen Gas Vents	Exempted Under Rule 62-213.430(6)	Existing
3c	Deareator Tank Vents	Deareator Tank Vents	Exempted Under Rule 62-213.430(6)	Existing
3d	Oil Vapor Extractors	Oil Vapor Extractors	Exempted Under Rule 62-213.430(6)	Existing
3e	Lube Oil Tank ( storage)	Organic Liquid Storage	Exempted Under Rule 62-213.430(6)	Existing
3f	Lube/Fuel Oil Drip Pans	Lube/Fuel Oil Drip Pans	Exempted Under Rule 62-213.430(6)	Existing
3g	Noncondensable Gas	Noncondensable Gas Extractor	Exempted Under Rule 62-213.430(6)	Existing
4	Steam Generator No. 6	Steam Generator - 300 mmBtu/hr	Regulated -Permit # AO37-242831	Existing
4a	Fuel Oil Piping	Fuel Oil Piping	Exempted Under Rule 62-213.430(6)	Existing
4b	Hydrogen Gas Vents	Hydrogen Gas Vents	Exempted Under Rule 62-213.430(6)	Existing
4c	Deareator Tank Vents	Deareator Tank Vents	Exempted Under Rule 62-213.430(6)	Existing
4d	Oil Vapor Extractors	Oil Vapor Extractors	Exempted Under Rule 62-213.430(6)	Existing
4e	Lube Oil Tank ( storage)	Organic Liquid Storage	Exempted Under Rule 62-213.430(6)	Existing
4f	Lube/Fuel Oil Drip Pans	Lube/Fuel Oil Drip Pans	Exempted Under Rule 62-213.430(6)	Existing
4g	Noncondensable Gas	Noncondensable Gas Extractor	Exempted Under Rule 62-213.430(6)	Existing
5	Steam Generator No. 7	Steam Generator - 621 mmBtu/hr	Regulated -Permit # AO37-242831	Existing
5a	Fuel Oil Piping	Fuel Oil Piping	Exempted Under Rule 62-213.430(6)	Existing
5b	Hydrogen Gas Vents	Hydrogen Gas Vents	Exempted Under Rule 62-213.430(6)	Existing
5c	Deareator Tank Vents	Deareator Tank Vents	Exempted Under Rule 62-213.430(6)	Existing
5d	Oil Vapor Extractors	Oil Vapor Extractors	Exempted Under Rule 62-213.430(6)	Existing
5e	Lube Oil Tank ( storage)	Organic Liquid Storage	Exempted Under Rule 62-213.430(6)	Existing
5f	Lube/Fuel Oil Drip Pans	Lube/Fuel Oil Drip Pans	Exempted Under Rule 62-213.430(6)	Existing
5g	Noncondensable Gas	Noncondensable Gas Extractor	Exempted Under Rule 62-213.430(6)	Existing
6	Emergency Generator	Diesel Engine	Exempted Under Rule 62-210.300(3)(a)21	Existing
6a	Diesel Driven Fire Pump	Diesel Engine	Exempted Under Rule 62-210.300(3)(a)21	New
7	Fuel Farm	Fuel Oil Tank No. 1	Exempted Under Rule 62-213.430(6)	Existing
7a	Fuel Farm	Fuel Oil Tank No. 2	Exempted Under Rule 62-213.430(6)	Existing
7b	Fuel Farm	Fuel Oil Tank No. 3	Exempted Under Rule 62-213.430(6)	Existing
7c	Fuel Farm	Kerosene Tank	Exempted Under Rule 62-213.430(6)	Existing
7d	Fuel Farm	Waste Oil Tank	Exempted Under Rule 62-213.430(6)	Existing
7e	Truck Loading/Unloading	Fuel Dispensing Operation	Unregulated - Proposed exemption under Rules 62-4.040 & 62-213.430(6)	Existing
8	No. 2 Fuel Oil Tank	Organic Liquid Storage	Exempted Under Rule 62-213.430(6)	Existing

CITY OF TALLAHASSEE ELECTRIC DEPARTMENT				
EMISSIONS UNIT INVENTORY				
SOURCE - PURDOM GENERATING STATION				
Unit No.	Emissions Unit	Emissions Unit Description	Regulatory (1) (2) Classification	Emission Unit Status
8a	Diesel Tank (300 gallons)	Organic Liquid Storage	Unregulated - Proposed exemption under Rules 62-4.040 & 62-213.430(6)	New
8b	Truck Loading/Unloading	Fuel Dispensing Operation	Unregulated - Proposed exemption under Rules 62-4.040 & 62-213.430(6)	New
9	Gasoline Tank	Organic Liquid Storage	Exempted Under Rule 62-213.430(6)	Existing
9a	Fuel Dispensing Operation	Fuel Dispensing Operation	Exempted Under Rule 62-213.430(6)	Existing
10	Diesel Tank	Organic Liquid Storage	Exempted Under Rule 62-213.430(6)	Existing
10a	Fuel Dispensing Operation	Fuel Dispensing Operation	Exempted Under Rule 62-213.430(6)	Existing
11	Barge Unloading Station	Fuel Dispensing Operation	Exempted Under Rule 62-213.430(6)	Existing
12	Fuel Dispensing Operation	Truck Loading/Unloading Rack 1	Exempted Under Rule 62-213.430(6)	Existing
12a	Fuel Dispensing Operation	Truck Loading/Unloading Rack 2	Unregulated - Proposed exemption under Rules 62-4.040 & 62-213.430(6)	New
13	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
13a	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
13b	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
13c	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
13d	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
13e	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
13f	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
13g	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
13h	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
13i	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
13j	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
13k	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
13l	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
13m	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
13n	Solvent Cleaning	Parts Washer - Nonhalogenated	Exempted Under Rule 62-213.430(6)	Existing
14	Space Heater	Space Heater	Exempted Under Rule 62-210.300(3)(a)12	Existing
14a	Space Heater	Space Heater	Exempted Under Rule 62-210.300(3)(a)12	Existing
14b	Space Heater	Space Heater	Exempted Under Rule 62-210.300(3)(a)12	Existing
14c	Space Heater	Space Heater	Exempted Under Rule 62-210.300(3)(a)12	Existing
14d	Space Heater	Space Heater	Exempted Under Rule 62-210.300(3)(a)12	Existing
14e	Space Heater	Space Heater	Exempted Under Rule 62-210.300(3)(a)12	Existing
14f	Space Heater	Space Heater	Exempted Under Rule 62-210.300(3)(a)12	Existing
15	Fugitive Dust	Paved Roads	Exempted Under Rule 62-213.430(6)	Existing
15a	Fugitive Dust	Unpaved Roads	Exempted Under Rule 62-213.430(6)	Existing
15b	Fugitive Dust	Heavy Construction Activities	Unregulated	Existing
15c	Fugitive Dust	Aggregate Handling & Storage	Exempted Under Rule 62-213.430(6)	Existing
16	Laboratory	Laboratory Equipment	Exempted Under Rule 62-210.300(3)(a)15	Existing
16a	Laboratory	Chemical Usage	Exempted Under Rule 62-213.430(6)	Existing
16b	Laboratory	Vacuum Pumps	Exempted Under Rule 62-210.300(3)(a)9	Existing
16c	Laboratory	Laboratory Fume Hoods	Exempted Under Rule 62-213.430(6)	Existing
17	Central Vacuum System	Central Vacuum System	Exempted Under Rule 62-213.430(6)	Existing
18	Maintenance Activities	Welding	Exempted Under Rule 62-210.300(3)(a)16	Existing

CITY OF TALLAHASSEE ELECTRIC DEPARTMENT EMISSIONS UNIT INVENTORY SOURCE - PURDOM GENERATING STATION				
Unit No.	Emissions Unit	Emissions Unit Description	Regulatory <sup>(1)</sup> <sup>(2)</sup> Classification	Emission Unit Status
19	Plant Operations	Lube Oil Storage Tanks	Exempted Under Rule 62-213.430(6)	Existing
19a	Plant Operations	Surface Coating Operations	Unregulated	Existing
19b	Plant Operations	Propane Storage Tanks	Exempted Under Rule 62-213.430(6)	Existing
20	Gasoline Engine	Welding Generator	Exempted Under Rule 62-210.300(3)(a)21	Existing
20a	Gasoline Engine	Welding Generator	Exempted Under Rule 62-210.300(3)(a)21	Existing
20b	Gasoline Engine	Emergency Generator	Exempted Under Rule 62-210.300(3)(a)21	Existing
20c	Gasoline Engine	Emergency Generator	Exempted Under Rule 62-210.300(3)(a)21	Existing
20d	Gasoline Engine	Emergency Generator	Exempted Under Rule 62-210.300(3)(a)21	Existing
21	Auxiliary Boiler	Steam Generator - 16.74 mmBtu/hr	Regulated - Permit # 1290001-002-AV	New

<sup>(1)</sup>Note: The designation "proposed exemption under criteria in Rule 62-213.430(6)" indicates that an exemption is requested for this unit pursuant to Rule 62-213.420(3), F.A.C., in accordance with the provisions of Rule 62-213.430(6), F.A.C.

<sup>(2)</sup>Note: All trivial emissions units and activities are omitted per FDEP 3/15/96 guidance memo. In addition, all mobil sources are omitted as outside the scope of Title V stationary source permitting.

COMPLIANCE CERTIFICATION

In accordance with the instructions for the Florida Department of Environmental Protection's Form No. 62-210.900(1), F.A.C., and Rule 62-213.420(3)(j), F.A.C., a compliance statement must be included in each application for an air pollution permit (i.e., Construction, Modification, State Operating or Title V Operating Permit). This Compliance Certification is intended to meet the requirements of the instructions and the regulation.

CERTIFICATION STATEMENT

"I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V Source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate and complete.

  
\_\_\_\_\_  
Signed

  
\_\_\_\_\_  
Date

**Section I. Facility Information.**

(Page replaced 4/18/97)

**Subsection A. Facility Description.**

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.

ANOMINAL

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

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

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 <del>Peaking Unit</del> (LHV)
-009	Combustion Turbine Number 2 - 228 MMBtu/hour <del>Peaking Unit</del> (LHV)
-011	Auxiliary Boiler

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

E.U. ID

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

(Page replaced 4/18/97)

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

## 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. <sup>NOT FEDERALLY ENFORCEABLE</sup> 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.~~

~~[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).

[Rule 62-296.320(4)(b)1., 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. 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.]

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) 448-3704, 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.** ~~any emissions units~~ <sup>THE NEW COMBINED CYCLE COMBUSTION TURBINE (UNIT No. 8) AND COOLING TOWER</sup> 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.]

#### Miscellaneous

12. ~~On or~~ <sup>WITHIN 10 DAYS</sup> 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~~ <sup>(WITH ANALYSIS TO FOLLOW)</sup> 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).

AND ON-SPEC USED OIL

{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:

NOT FEDERALLY ENFORCEABLE

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

CITY-GENERATED ON-SPEC USED OIL.

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

COMPLIANCE WITH THE MAXIMUM HEAT INPUT RATE SHALL BE BASED ON A 24-HOUR AVERAGING PERIOD (BLOCK - MIDNIGHT TO MIDNIGHT) AND SHALL BE DETERMINED BASED ON THE HEAT'S VALUE OF THE FUELS USED (BASED ON VENDOR DATA) AND FUEL FLOW METER DATA.

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

NOT FEDERALLY ENFORCEABLE

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 ON-SPEC USED OIL

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.]

**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.]

*MOVE TO COMMON CONDITION C.4.*  
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.]

*MOVE TO COMMON CONDITION C.4.*  
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.  
[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.]

*AND ON-SPEC USED OIL*  
A.11. 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.18. 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.12. This emissions unit is also subject to the conditions contained in Subsection C. Common Conditions, as specified below.

**Excess Emissions**

A.13. See common conditions C.1. - C.3.

**Monitoring of Operations**

A.14. 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.11., C.8. and C.9.

[Rule 62-296.405(1)(f)1.b., F.A.C.]

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

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

A.18. Sulfur Dioxide. See specific condition A.14. and common conditions C.8. and C.9.

A.19. Operating Rate During Testing. See common condition C.11.

A.20. Calculation of Emission Rate. See common condition C.12.

A.21. Applicable Test Procedures. See common condition C.13.

A.22. Required Stack Sampling Facilities. See common condition C.14.

A.23. Frequency of Compliance Tests. See common condition C.15.

**Recordkeeping and Reporting Requirements**

A.24. See common conditions C.18. - C.20.

**Reasonable Assurances**

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.]

AT THIS TIME

UNTIL BOILERS NUMBER 5 AND NUMBER 6 ARE PERMANENTLY SHUT-DOWN OR SEPARATE PIPING IS INSTALLED.

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Subsection B. This section addresses the following emissions unit.

(Page replaced 4/18/97)

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.

AND/OR  
ON-SPEC  
USED OIL

{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. <sup>NOT FEDERALLY ENFORCEABLE</sup> 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.]  
COMPLIANCE WITH THE MAXIMUM HEAT INPUT RATE SHALL BE BASED ON A 24-HOUR AVERAGE PERIOD (BLOCK-MIDNIGHT TO MIDNIGHT) AND SHALL BE DETERMINED BASED ON THE HEATING VALUE OF THE FUELS USED (BASED ON VENDOR DATA) AND FUEL FLOW METER DATA.  
CITY-GENERATED ON-SPEC USED OIL.

B.2. <sup>NOT FEDERALLY ENFORCEABLE</sup> Emissions Unit Operating Rate Limitation After Testing. See specific condition C.II.  
[Rule 62-297.310(2), F.A.C.]

B.3. <sup>NOT FEDERALLY ENFORCEABLE</sup> 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.] AND/OR ON-SPEC USED OIL.

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.]

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.}



(Page replaced 4/18/97)

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.]

MOVE TO  
COMMON  
CONDITION  
C.4.

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.]

MOVE TO  
COMMON  
CONDITION  
C.4.

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**

(Page replaced 4/18/97)

{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.]

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 15, 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**

(Page replaced 4/18/97)

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



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liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery. See specific conditions A.11., 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.]

NOT FEDERALLY ENFORCEABLE.

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.]

AND ANY  
FUEL OIL TO  
GAS RATIO

SUBSEQUENT EMISSIONS UNIT OPERATION IS LIMITED TO 110 PERCENT OF THE TEST FUEL OIL TO GAS RATIO UNTIL A NEW TEST IS CONDUCTED

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.

(Page replaced 4/18/97)

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 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		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 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;
  - 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.

**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. <sup>NOT FEDERALLY ENFORCEABLE</sup> 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)	Natural Gas
	228 (LHV)	No. 2 Fuel Oil
9	228 (LHV)	Natural Gas
	228 (LHV)	No. 2 Fuel Oil

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

D.2. <sup>NOT FEDERALLY ENFORCEABLE</sup> Emissions Unit Operating Rate Limitation After Testing. See specific condition **D.13**. <sup>COMPLIANCE WITH THE MAXIMUM HEAT INPUT RATE SHALL BE BASED ON A 24-HOUR AVERAGING PERIOD (BLOCK - MIDNIGHT TO MIDNIGHT) AND SHALL BE DETERMINED BASED ON THE HEATING VALUE OF THE FUELS USED (BASED ON VENDOR DATA) AND FUEL FLOW METER DATA.</sup>

D.3. <sup>NOT FEDERALLY ENFORCEABLE.</sup> 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, ~~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.]

**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.11. 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. <sup>NOT FEDERALLY ENFORCEABLE</sup> 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.]

NOT FEDERALLY ENFORCEABLE

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.]

NOT FEDERALLY ENFORCEABLE

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.]

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 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).]

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**

<u>No.</u>	<u>Brief Description</u>
-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: *UNTIL THE UNIT IS CONSTRUCTED AND COMPLIANCE WITH THE TERMS AND CONDITIONS OF THE PERMIT HAVE BEEN DEMONSTRATED*

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. 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. *NOT FEDERALLY ENFORCEABLE* Permitted Capacity. The maximum operation heat input rate is as follows:

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

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.406, F.A.C.] *COMPLIANCE WITH THE MAXIMUM HEAT INPUT RATE SHALL BE BASED ON A 24-HOUR AVERAGING PERIOD (BLOCK-MIDNIGHT TO MIDNIGHT) AND SHALL BE DETERMINED BASED ON THE HEATING VALUE OF THE FUELS USED (BASED ON VENDOR DATA) AND FUEL FLOW METER DATA.*

**NOT FEDERALLY ENFORCEABLE**  
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. 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.]~~

E.8. 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.9. 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.10. Excess emissions resulting from <sup>STARTUP, SHUTDOWN OR</sup> 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.11. 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.]~~

E.12. 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**

E.13. 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.14. 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.15. Visible Emissions. See common conditions **C.5. and C.6.**

E.16. Operating Rate During Testing. See common condition **C.11.**

E.17. Applicable Test Procedures. See common condition **C.13.(a)2.**

E.18. Frequency of Compliance Tests. See common condition **C.15. except (a)5. & 8.**

E.19. 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.20. 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.21. See common conditions C.18. and C.20.(a) & (b).



## APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97)

[Note: This attachment includes "canned conditions" developed from the "Title V Core List."]

{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.}

### Chapter 62-4. F.A.C.

1. General Prohibition. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the Department, unless the source is exempted by Department rule. The Department may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the provisions of Chapter 403, F.S., or the rules promulgated thereunder. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit.

[Rule 62-4.030, Florida Administrative Code (F.A.C.); Section 403.087, Florida Statute (F.S.)]

*INSERT  
RULE 62-4.040,  
F.A.C.* →

### 2. Not federally enforceable. Procedure to Obtain Permits: Application.

(1) Any person desiring to obtain a permit from the Department shall apply on forms prescribed by the Department and shall submit such additional information as the Department by law may require.

(2) All applications and supporting documents shall be filed in quadruplicate with the Department.

(3) To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. All applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except when the application is for renewal of an air pollution operation permit at a minor facility as defined in Rule 62-210.200, F.A.C., or where professional engineering is not required by Chapter 471, F.S. Where required by Chapter 471 or 492, F.S., applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.

(4) Processing fees for air construction permits shall be in accordance with Rule 62-4.050(4), F.A.C.

(5)(a) To be considered by the Department, each application must be accompanied by the proper processing fee. The fee shall be paid by check, payable to the Department of Environmental Protection. The fee is non-refundable except as provided in Section 120.60, F.S., and in this section.

(c) Upon receipt of the proper application fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin.

(d) If the applicant does not submit the required fee within ten days of receipt of written notification, the Department shall either return the unprocessed application or arrange with the applicant for the pick up of the application.

(e) If an applicant submits an application fee in excess of the required fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin upon receipt, and the Department shall refund to the applicant the amount received in excess of the required fee.

(6) Any substantial modification to a complete application shall require an additional processing fee determined pursuant to the schedule set forth in Rule 62-4.050, F.A.C., and shall restart the time requirements of Sections 120.60 and 403.0876, F.S. For purposes of this Subsection, the term "substantial modification" shall mean a modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review.

(7) Modifications to existing permits proposed by the permittee which require substantial changes in the existing permit or require substantial evaluation by the Department of potential impacts of the proposed modifications shall require the same fee as a new application.

[Rule 62-4.050, F.A.C.]

3. Standards for Issuing or Denying Permits. Except as provided at Rule 62-213.460, F.A.C., the issuance of a permit does not relieve any person from complying with the requirements of Chapter 403, F.S., or Department rules.

[Rule 62-4.070(7), F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

4. Modification of Permit Conditions.

(1) For good cause and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions and on application of the permittee the Department may grant additional time. For the purpose of this section, good cause shall include, but not be limited to, any of the following:

- (a) A showing that an improvement in effluent or emission quality or quantity can be accomplished because of technological advances without unreasonable hardship.
- (b) A showing that a higher degree of treatment is necessary to effect the intent and purpose of Chapter 403, F.S.
- (c) A showing of any change in the environment or surrounding conditions that requires a modification to conform to applicable air or water quality standards.
- (e) Adoption or revision of Florida Statutes, rules, or standards which require the modification of a permit condition for compliance.

(2) A permittee may request a modification of a permit by applying to the Department.

(3) A permittee may request that a permit be extended as a modification of the permit. Such a request must be submitted to the Department in writing before the expiration of the permit. Upon timely submittal of a request for extension, unless the permit automatically expires by statute or rule, the permit will remain in effect until final agency action is taken on the request. For construction permits, an extension shall be granted if the applicant can demonstrate reasonable assurances that, upon completion, the extended permit will comply with the standards and conditions required by applicable regulation. For all other permits, an extension shall be granted if the applicant can demonstrate reasonable assurances that the extended permit will comply with the standards and conditions applicable to the original permit. A permit for which the permit application fee was prorated in accordance with Rule 62-4.050(4)(1), F.A.C., shall not be extended. In no event shall a permit be extended or remain in effect longer than the time limits established by statute or rule.

[Rule 62-4.080, F.A.C.]

5. Renewals. Prior to one hundred eighty (180) days before the expiration of a permit issued pursuant to Chapter 62-213, F.A.C., the permittee shall apply for a renewal of a permit using forms incorporated by reference in the specific rule chapter for that kind of permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 180 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department or, if there is court review of the Department's final agency action, until a later date is required by Section 120.60, F.S., provided that, for renewal of a permit issued pursuant to Chapter 62-213, F.A.C., the applicant complies with the requirements of Rules 62-213.420(1)(b)3. and 4., F.A.C.

[Rule 62-4.090(1), F.A.C.]

6. Suspension and Revocation.

(1) Permits shall be effective until suspended, revoked, surrendered, or expired and shall be subject to the provisions of Chapter 403, F.S., and rules of the Department.

(2) Failure to comply with pollution control laws and rules shall be grounds for suspension or revocation.

(3) A permit issued pursuant to Chapter 62-4, F.A.C., shall not become a vested property right in the permittee. The Department may revoke any permit issued by it if it finds that the permit holder or the permit holder's agent:

- (a) Submitted false or inaccurate information in application or operational reports.
- (b) Has violated law, Department orders, rules or permit conditions.
- (c) Has failed to submit operational reports or other information required by Department rules.
- (d) Has refused lawful inspection under Section 403.091, F.S.

[Rule 62-4.100, F.A.C.]

7. Not federally enforceable. Financial Responsibility. The Department may require an applicant to submit proof of financial responsibility and may require the applicant to post an appropriate bond to guarantee compliance with the law and Department rules.

[Rule 62-4.110, F.A.C.]



APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

8. Transfer of Permits.

- (1) Within 30 days after the sale or legal transfer of a permitted facility, an "Application for Transfer of Permit" (DEP Form 62-1.201(1)) must be submitted to the Department. This form must be completed with the notarized signatures of both the permittee and the proposed new permittee.
- (2) The Department shall approve the transfer of a permit unless it determines that the proposed new permittee cannot provide reasonable assurances that conditions of the permit will be met. The determination shall be limited solely to the ability of the new permittee to comply with the conditions of the existing permit, and it shall not concern the adequacy of these permit conditions. If the Department proposes to deny the transfer, it shall provide both the permittee and the proposed new permittee a written objection to such transfer together with notice of a right to request a Chapter 120, F.S., proceeding on such determination.
- (3) Within 30 days of receiving a properly completed Application for Transfer of Permit form, the Department shall issue a final determination. The Department may toll the time for making a determination on the transfer by notifying both the permittee and the proposed new permittee that additional information is required to adequately review the transfer request. Such notification shall be served within 30 days of receipt of an Application for Transfer of Permit form, completed pursuant to Rule 62-4.120(1), F.A.C. If the Department fails to take action to approve or deny the transfer within 30 days of receipt of the completed Application for Transfer of Permit form, or within 30 days of receipt of the last item of timely requested additional information, the transfer shall be deemed approved.
- (4) The permittee is encouraged to apply for a permit transfer prior to the sale or legal transfer of a permitted facility. However, the transfer shall not be effective prior to the sale or legal transfer.
- (5) Until this transfer is approved by the Department, the permittee and any other person constructing, operating, or maintaining the permitted facility shall be liable for compliance with the terms of the permit. The permittee transferring the permit shall remain liable for corrective actions that may be required as a result of any violations occurring prior to the sale or legal transfer of the facility.

[Rule 62-4.120, F.A.C.]

9. Plant Operation-Problems. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules.

[Rule 62-4.130, F.A.C.]

10. <sup>NOT FEDERALLY ENFORCEABLE.</sup> For purposes of notification to the Department pursuant to Rule 62-4.130, F.A.C., Plant Operation-Problems, "immediately" shall mean the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the incident, excluding weekends and holidays.

[40 CFR 70.6(a)(3)(iii)(B)]

11. Review. Failure to request a hearing <sup>OR MEDIATION</sup> within 14 days of receipt of notice of proposed or final agency action on a permit application or as otherwise required in Chapter 62-103, F.A.C., shall be deemed a waiver of the right to an administrative hearing.

[Rule 62-4.150, F.A.C.]

12. <sup>NOT FEDERALLY ENFORCEABLE.</sup> Permit Conditions. All permits issued by the Department shall include the following general conditions:

- (1) The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- (2) This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- (3) As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
- (4) This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

- (5) This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.
- (6) The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- (7) The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
- (a) Have access to and copy any records that must be kept under conditions of the permit;
  - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
  - (c) Sample or monitor any substances or parameters at any location reasonable necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
- (8) If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of noncompliance; and,
  - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- (9) In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- (10) The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.
- (11) This permit is transferable only upon Department approval in accordance with Rule 62-4.120, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- (12) This permit or a copy thereof shall be kept at the work site of the permitted activity.
- (14) The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five (5) years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - (c) Records of monitoring information shall include:
    - 1. the date, exact place, and time of sampling or measurements;
    - 2. the person responsible for performing the sampling or measurements;
    - 3. the dates analyses were performed;
    - 4. the person responsible for performing the analyses;
    - 5. the analytical techniques or methods used; and,
    - 6. the results of such analyses.
- (15) When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.
- [Rules 62-4.160 and 62-213.440(1)(b), F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

13. Construction Permits.

(1) No person shall construct any installation or facility which will reasonably be expected to be a source of air or water pollution without first applying for and receiving a construction permit from the Department unless exempted by statute or Department rule. In addition to the requirements of Chapter 62-4, F.A.C., applicants for a Department Construction Permit shall submit the following as applicable:

- (a) A completed application on forms furnished by the Department.
- (b) An engineering report covering:
  - 1. plant description and operations,
  - 2. types and quantities of all waste material to be generated whether liquid, gaseous or solid,
  - 3. proposed waste control facilities,
  - 4. the treatment objectives,
  - 5. the design criteria on which the control facilities are based, and,
  - 6. other information deemed relevant.

Design criteria submitted pursuant to Rule 62-4.210(1)(b)5., F.A.C., shall be based on the results of laboratory and pilot-plant scale studies whenever such studies are warranted. The design efficiencies of the proposed waste treatment facilities and the quantities and types of pollutants in the treated effluents or emissions shall be indicated. Work of this nature shall be subject to the requirements of Chapter 471, F.S. Where confidential records are involved, certain information may be kept confidential pursuant to Section 403.111, F.S.

- (c) The owners' written guarantee to meet the design criteria as accepted by the Department and to abide by Chapter 403, F.S. and the rules of the Department as to the quantities and types of materials to be discharged from the installation. The owner may be required to post an appropriate bond or other equivalent evidence of financial responsibility to guarantee compliance with such conditions in instances where the owner's financial resources are inadequate or proposed control facilities are experimental in nature.

(2) The construction permit may contain conditions and an expiration date as determined by the Secretary or the Secretary's designee.

(3) When the Department issues a permit to construct, the permittee shall be allowed a period of time, specified in the permit, to construct, and to operate and test to determine compliance with Chapter 403, F.S., and the rules of the Department and, where applicable, to apply for and receive an operation permit. The Department may require tests and evaluations of the treatment facilities by the permittee at his/her expense.

[Rule 62-4.210, F.A.C.]

14. Operation Permit for New Sources. To properly apply for an operation permit for new sources, the applicant shall submit certification that construction was completed noting any deviations from the conditions in the construction permit and test results where appropriate.

[Rule 62-4.220, F.A.C.]

Chapter 62-103, F.A.C.

15. Public Notice, Public Participation, and Proposed Agency Action. The permittee shall comply with all of the requirements for public notice, public participation, and proposed agency action pursuant to Rule 62-103.150 and Rule 62-210.350, F.A.C.

[Rules 62-103.150, 62-210.350 and 62-213.430(1)(b), F.A.C.]

16. Administrative Hearing. The permittee shall comply with all of the requirements for a petition for administrative hearing <sup>or</sup> waiver of right to administrative proceeding pursuant to Rule 61-103.155, F.A.C.

[Rule 62-103.155, F.A.C.]

Chapter 62-204, F.A.C.

~~17. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source.~~

~~[40 CFR 61, Rule 62-204.800, F.A.C., and Chapter 62-257, F.A.C.]~~

MEDIATION  
A

Chapter 62-210, F.A.C.

18. Permits Required. The owner or operator of any emissions unit which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from the Department prior to beginning construction, modification, or initial or continued operation of the emissions unit unless exempted pursuant to Department rule or statute. All emissions limitations, controls, and other requirements imposed by such permits shall be at least as stringent as any applicable limitations and requirements contained in or enforceable under the State Implementation Plan (SIP) or that are otherwise federally enforceable. Except as provided at Rule 62-213.460, F.A.C., issuance of a permit does not relieve the owner or operator of any emissions unit from complying with applicable emission limiting standards or other requirements of the air pollution rules of the Department, or any other applicable requirements under federal, state, or local law.

(1) Air Construction Permits. An air construction permit shall be obtained by the owner or operator of any proposed new or modified facility or emissions unit prior to the beginning of construction or modification, in accordance with all applicable provisions of Chapters 62-210, 62-212 and 62-4, F.A.C. The construction permit shall be issued for a period of time sufficient to allow construction or modification of the facility or emissions unit and operation while the new or modified facility or emissions unit is conducting tests or otherwise demonstrating initial compliance with the conditions of the construction permit.

(2) Air Operation Permits. Upon expiration of the air operation permit for any existing facility or emissions unit, subsequent to construction or modification and demonstration of initial compliance with the conditions of the construction permit for any new or modified facility or emissions unit, or as otherwise provided in Chapter 62-210 or Chapter 62-213, the owner or operator of such facility or emissions unit shall obtain a renewal air operation permit, an initial air operation permit, or an administrative correction or revision of an existing air operation permit, whichever is appropriate, in accordance with all applicable provisions of Chapter 62-210, Chapter 62-213, and Chapter 62-4, F.A.C.

(a) Minimum Requirements for All Air Operation Permits. At a minimum, a permit issued pursuant to this subsection shall:

1. Specify the manner, nature, volume and frequency of the emissions permitted, and the applicable emission limiting standards or performance standards, if any;
2. Require proper operation and maintenance of any pollution control equipment by qualified personnel, where applicable in accordance with the provisions of any operation and maintenance plan required by the air pollution rules of the Department.
3. Contain an effective date stated in the permit which shall not be earlier than the date final action is taken on the application and be issued for a period, beginning on the effective date, as provided below.

a. The operation permit for an emissions unit which is in compliance with all applicable rules and in operational condition, and which the owner or operator intends to continue operating, shall be issued or renewed for a five-year period, except that, for Title V sources subject to Rule 62-213.420(1)(a)1., F.A.C., operation permits shall be extended until 60 days after the due date for submittal of the facility's Title V permit application as specified in Rule 62-213.420(1)(a)1., F.A.C.

b. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for six months or more prior to the expiration date of the current operation permit, shall be renewed for a period not to exceed five years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided:

- (i) the owner or operator of the emissions unit demonstrates to the Department that the emissions unit may need to be reactivated and used, or that it is the owner's or operator's intent to apply to the Department for a permit to construct a new emissions unit at the facility before the end of the extension period; and,
- (ii) the owner or operator of the emissions unit agrees to and is legally prohibited from providing the allowable emission permitted by the renewed permit as an emissions offset to any other person under Rule 62-212.500, F.A.C.; and,
- (iii) the emissions unit was operating in compliance with all applicable rules as of the time the source was shut down.

c. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for five years or more prior to the expiration date of the current operation permit shall be renewed for a maximum period not to exceed ten years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided the conditions given in Rule 62-210.300(2)(a)3.b., F.A.C., are met and the owner or operator demonstrates to the Department that failure to renew the permit would constitute a hardship, which may include economic hardship.

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

subject to any condition listed at 40 CFR 70.7(f)(1), hereby adopted and incorporated by reference. The below requirements from 40 CFR 70.7(f) are adopted and incorporated by reference in Rule 62-213.430(4), F.A.C.:

o 40 CFR 70.7(f): Reopening for Cause.

(1) This section contains provisions from 40 CFR 70.7(f) that specify the conditions under which a Title V permit shall be reopened prior to the expiration of the permit. A Title V permit shall be reopened and revised under any of the following circumstances:

(i) Additional applicable requirements under the Act become applicable to a major Part 70 source with a remaining permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii).

(ii) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approved by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

(iii) The permitting authority or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

(iv) The Administrator or the permitting authority determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(2) Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

(3) Reopenings under 40 CFR 70.7(f)(1) shall not be initiated before a notice of such intent is provided to the Part 70 source by the permitting authority at least 30 days in advance of the date that the permit is to be reopened, except that the permitting authority may provide a shorter time period in the case of an emergency.

[Rules 62-213.430(3) & (4), F.A.C.; and, 40 CFR 70.7(f)]

40. Permit Duration. Operation permits for Title V sources may not be extended as provided in Rule 62-4.080(3), F.A.C., if such extension will result in a permit term greater than five (5) years.

[Rule 62-213.440(1)(a), F.A.C.]

41. Monitoring Information. All records of monitoring information shall specify the date, place, and time of sampling or measurement and the operating conditions at the time of sampling or measurement, the date(s) analyses were performed, the company or entity that performed the analyses, the analytical techniques or methods used, and the results of such analyses.

[Rule 62-213.440(1)(b)2.a., F.A.C.]

42. Retention of Records. Retention of records of all monitoring data and support information shall be for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

[Rule 62-213.440(1)(b)2.b., F.A.C.]

43. Monitoring Reports. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports.

[Rule 62-213.440(1)(b)3.a., F.A.C.]

44. Deviation from Permit Requirements Reports. The permittee shall report in accordance with the requirements of Rules 62-210.700(6) and 62-4.130, F.A.C., any deviations from permit requirements, including those attributable to upset conditions as defined in the permit. Reports shall include the probable cause of such deviations, and any corrective actions or preventive measures taken.

[Rule 62-213.440(1)(b)3.b., F.A.C.]

45. Reports. All reports shall be accompanied by a certification by a responsible official, pursuant to Rule 62-213.420(4), F.A.C.

[Rule 62-213.440(1)(b)3.c., F.A.C.]



APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

46. If any portion of the final permit is invalidated, the remainder of the permit shall remain in effect.

[Rule 62-213.440(1)(d)1., F.A.C.]

47. It shall not be a defense for a permittee in an enforcement action that maintaining compliance with any permit condition would necessitate halting of or reduction of the source activity.

[Rule 62-213.440(1)(d)3., F.A.C.]

48. A Title V source shall comply with all the terms and conditions of the existing permit until the Department has taken final action on any permit renewal or any requested permit revision, except as provided at Rule 62-213.412(2), F.A.C.

[Rule 62-213.440(1)(d)4., F.A.C.]

49. A situation arising from sudden and unforeseeable events beyond the control of the source which causes an exceedance of a technology-based emissions limitation because of unavoidable increases in emissions attributable to the situation and which requires immediate corrective action to restore normal operation, shall be an affirmative defense to an enforcement action in accordance with the provisions and requirements of 40 CFR 70.6(g)(2) and (3), hereby adopted and incorporated by reference.

[Rule 62-213.440(1)(d)5., F.A.C.]

50. Confidentiality Claims. Any permittee may claim confidentiality of any data or other information by complying with Rule 62-213.420(2), F.A.C.

[Rule 62-213.440(1)(d)6., F.A.C.]

51. Statement of Compliance. The permittee shall submit a statement of compliance with all terms and conditions of the permit. Such statement shall be submitted to the Department and EPA annually, or more frequently if specified by Rule 62-213.440(2), F.A.C., or by any other applicable requirement. The statement of compliance shall include the identity of each term or condition of the permit for which each unit has remained in compliance during the period covered by the statement. The statement shall include identification of all methods used to demonstrate compliance and identification of each term or condition of the permit for which any unit has not remained in compliance during the period covered by the statement. For each term or condition for which the source has not remained in compliance during the period covered by the statement, the statement shall also identify each unit not in compliance and each term and condition with which the unit was not in compliance and state the inclusive dates that the source was not in compliance, the actions taken to achieve compliance and the method used to demonstrate compliance. Such statement shall be accompanied by a certification by a responsible official, in accordance with Rule 62-213.420(4), F.A.C.

[Rule 62-213.440(3), F.A.C.]

52. Permit Shield. Except as provided in Chapter 62-213, F.A.C., compliance with the terms and conditions of a permit issued pursuant to Chapter 62-213, F.A.C., shall be deemed compliance with any applicable requirements in effect as of the date of permit issuance, provided that the source included such applicable requirements in the permit application. Nothing in Rule 62-213.460, F.A.C., or in any permit shall alter or affect the ability of EPA or the Department to deal with an emergency, the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance, or the requirements of the Federal Acid Rain Program.

[Rule 62-213.460, F.A.C.]

53. Forms and Instructions. The forms used by the Department in the Title V source operation program are adopted and incorporated by reference in Rule 62-213.900, F.A.C. The form is listed by rule number, which is also the form number, and with the subject, title, and effective date. Copies of forms may be obtained by writing to the Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, or by contacting the appropriate permitting authority.

(1) Major Air Pollution Source Annual Emissions Fee (AEF) Form.

[Rule 62-213.900(1), F.A.C.]

Chapter 62-256, F.A.C.

**NOT FEDERALLY ENFORCEABLE**

54. Open Burning. This permit does not authorize any open burning nor does it constitute any waiver of the requirements of Chapter 62-256, F.A.C. Source shall comply with Chapter 62-256, F.A.C., for any open burning at the source.

[Chapter 62-256, F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

Chapter 62-257, F.A.C.

**NOT FEDERALLY ENFORCEABLE.**  
55. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source.  
[40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

Chapter 62-281, F.A.C.

**NOT FEDERALLY ENFORCEABLE.**  
56. Refrigerant Requirements. Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed at 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or Class II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts B and F, and with Rule 62-281.100, F.A.C. Those requirements include the following restrictions:  
(1) Any facility having any refrigeration equipment normally containing 50 (fifty) pounds of refrigerant, or more, must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added;  
(2) No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided at 40 CFR 82.34, and properly uses equipment approved pursuant to 40 CFR 82.40;  
(3) No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or Class II substance at 40 CFR 82, Subpart A, Appendices A and B, except in compliance with Rule 62-281.100, F.A.C., and 40 CFR 82.34(B);  
(4) No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or Class II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined at 40 CFR 82.152) for service, maintenance or repair without using equipment certified for that type of appliance pursuant to 40 CFR 82.158 and without observing the practices set forth at 40 CFR 82.156;  
(5) No person may dispose of appliances (except small appliances, as defined at 40 CFR 82.152) without using equipment certified for that type of appliance pursuant to 40 CFR 82.158 and without observing the practices set forth at 40 CFR 82.156;  
(6) No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined at 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82, Subpart F.  
[40 CFR 82; and, Chapter 62-281, F.A.C.]

Chapter 62-296, F.A.C.

**NOT FEDERALLY ENFORCEABLE.**  
57. Industrial, Commercial, and Municipal Open Burning Prohibited. Open burning in connection with industrial, commercial, or municipal operations is prohibited, except when:  
(a) Open burning is determined by the Department to be the only feasible method of operation and is authorized by an air permit issued pursuant to Chapter 62-210 or 62-213, F.A.C.; or  
(b) An emergency exists which requires immediate action to protect human health and safety; or  
(c) A county or municipality would use a portable air curtain incinerator to burn yard trash generated by a hurricane, tornado, fire or other disaster and the air curtain incinerator would otherwise be operated in accordance with the permitting exemption criteria of Rule 62-210.300(3), F.A.C.  
[Rule 62-296.320(3), F.A.C.]



58. Unconfined Emissions of Particulate Matter.

(4)(c)1. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any emissions unit whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.

2. Reasonable precautions may include, but shall not be limited to the following:

- a. Paving and maintenance of roads, parking areas and yards.
- b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar emissions units.
- d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the emissions unit to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- e. Landscaping or planting of vegetation.
- f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- g. Confining abrasive blasting where possible.
- h. Enclosure or covering of conveyor systems.

[Rules 62-296.320(4)(c)1. & 3., F.A.C.]

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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

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

## Appendix E-1, Continued.

### 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~~ < DIESEL OIL 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~~

### (1-15) SPACE HEATERS Fugitive PM<sub>10</sub> Emissions

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

### Laboratory

48. Laboratory Fume Hoods  
LABORATORY EQUIPMENT  
CHEMICAL USAGE
49. Central Vacuum System  
VACUUM PUMPS

### Maintenance Activities

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

**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.~~

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

(1) FIRE PUMP

-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.

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

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

DRAFT 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	N/A	N/A	62-296.405(1)(a)	A.5. & A.6.
-006	Boiler #6 (300 MMBtu/hour)	VE	Natural Gas	8760	20%; 40% - 1 two min. period/hr.	N/A	N/A	N/A	N/A	62-296.405(1)(a)	A.5. & A.6.
	(22 MW Turbine-generator) (each unit)	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.
		PM	Natural Gas	8760	0.1 lb/MMBtu	N/A	N/A	30.0	131.40	62-296.405(1)(b)	A.7.
		PM - SR	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.
		SO <sub>2</sub>	No. 6 - No. 2 F.O.	8760	1.3 lb/MMBtu	N/A	N/A	390.0	1,708.20	Applicant Request	A.10.
			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	N/A	N/A	62-296.405(1)(a)	B.5.
	Acid Rain Phase II Unit	VE	Natural Gas	8760	20%; 40% - 1 two min. period/hr.	N/A	N/A	N/A	N/A	62-296.405(1)(a)	B.5.
	(44 MW Turbine-generator)	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.
		PM	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.
		SO <sub>2</sub>	No. 6 - No. 2 F.O.	8760	1.87 lb/MMBtu	N/A	N/A	1,161.27	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.			1,161.27	5,086.36	Applicant Request	B.10.
-008	Combustion Turbine No. 1 (228 MMBtu/hour)	VE	No. 2 F.O.	6993	Less than 20%	N/A	N/A	N/A	N/A	62-296.320(4)(b)	D.5.
		VE	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 (228 MMBtu/hour)	SO <sub>2</sub>	No. 2 F.O.	6993	0.4% sulfur	N/A	N/A	97.4	340.6	AG 05-242827	D.6.
		SO <sub>2</sub>	Natural Gas	6993	N/A	N/A	N/A	N/A	N/A	N/A	N.A.
-011	Auxiliary Boiler	VE	Natural Gas	2000	Less than 20%	N/A	N/A	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.

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

20%; 40% - 1 TWO MIN. PERIOD/HR.  
① AND ON-SPEC USED OIL  
② 60% - 3HR/DAY FOR SOOTBLOWING AND LOAD CHANGES.

**Table 2-1, Summary of Compliance Requirements**

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

**DRAFT 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	Min. Compliance	CMS <sup>1</sup>	See Permit Condition(s)
					Frequency	Base Date <sup>2</sup>	Test Duration		
-005	Boiler No. 5	VE	No. 6 - No. 2 F.O.	DEP method 9	Annually <sup>3</sup>	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.	1, 2, 3 & 5, or 17	Annually <sup>3</sup>	7/1 - 9/30	<del>60 Minutes</del> AVE. OF THREE 1HR RUNS	No	C.7., C.10. - 15., C.17.
			Natural Gas	1, 2, 3 & 5, or 17	Annually <sup>3</sup>	7/1 - 9/30	<del>60 Minutes</del> AVE. OF THREE 1HR RUNS	No	
		SO <sub>2</sub>	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	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.	1, 2, 3 & 5, or 17	Annually <sup>3</sup>	7/1 - 9/30	<del>60 Minutes</del> AVE. OF THREE 1HR RUNS	No	C.7., C.10. - 15., C.17.
			Natural Gas	1, 2, 3 & 5, or 17	<del>Annually <sup>3</sup></del> N/A	7/1 - 9/30	<del>60 Minutes</del> AVE. OF THREE 1HR RUNS	No	
		SO <sub>2</sub>	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 <sup>4</sup>	7/1 - 9/30	30 Minutes	No	D.13. - D.16.
-009	Combustion Turbine No. 2		Natural Gas	EPA Method 9	<del>Annually <sup>4</sup></del> N/A	7/1 - 9/30	30 Minutes	No	
		SO <sub>2</sub>	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		<del>30</del> 60 - 30 Minutes	No	E.15. - E.19.
		PM	Natural Gas	N/A	N/A	N/A	N/A	No	N/A
		SO <sub>2</sub>	Natural Gas	N/A	N/A	N/A	N/A	No	N/A

**Notes:**

<sup>1</sup> CMS [=] continuous monitoring system.

<sup>2</sup> Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

<sup>3</sup> Test not required in years that fuel oil is fired less than 400 hours. *PM TESTING IS NOT REQUIRED PRIOR TO PERMIT RENEWAL IF OIL IS FIRED LESS THAN 400 HOURS DURING THE PRIOR YEAR.*

<sup>4</sup> 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.



Barbara,  
Please fly

FROM: SCOTT M. SHEPLAK, P.E.  
PROFESSIONAL ENGINEER  
BUREAU OF AIR REGULATION

Lawton Chiles  
Governor

STATE OF FLORIDA  
DEPT. OF ENVIRONMENTAL PROTECTION  
DIV. OF AIR RESOURCES MANAGEMENT  
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Virginia B. Wetherell  
Secretary

FAX TRANSMITTAL SHEET

TO: Jeannette Curtis, City of Tallahassee

Fax # (904) 891-8277

DATE: 4/18/17

PHONE: (904) 891-8852

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 12

Re: Updates to DRAFT Permit No. : 1290001-001-AV

COMMENTS: \_\_\_\_\_

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\_\_\_\_\_

\_\_\_\_\_

PHONE: \_\_\_\_\_

FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call the above phone number.





# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

April 18, 1997

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

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

Dear Mr. McGarrah:

In response to your letter dated April 16, 1997, please find enclosed updated pages to the subject permit issued on March 24, 1997.

Please replace the appropriate pages with the enclosed pages. Please return the old pages. By this letter I am also asking the people listed below to do the same. Thank you for your cooperation in this matter.

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

Sincerely,

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

SS/sk  
Enclosures

copy to:  
Jeannette Curtis, City of Tallahassee  
Darrel Graziani, P.E., Foster Wheeler Environmental Corporation  
Karl Baur, P.E., City of Tallahassee  
Ed K. Middleswart, DEP, Northwest District Office  
Gerry Neubaur, DEP, Northwest District Branch Office

**Section I. Facility Information.**

(Page replaced 4/18/97)

**Subsection A. Facility Description.**

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.

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

**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 Peaking Unit
-009	Combustion Turbine Number 2 - 228 MMBtu/hour Peaking Unit
-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.**

(Page replaced 4/18/97)

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-A/C  
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

**Subsection B. This section addresses the following emissions unit.**

(Page replaced 4/18/97)

**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:

<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.]

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 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.]

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.]

**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.}

(Page replaced 4/18/97)

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**

(Page replaced 4/18/97)

{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
NOx	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.]}

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**

(Page replaced 4/18/97)

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



(Page replaced 4/18/97)

**liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor upon each fuel delivery.** See specific conditions **A.11., 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.]

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.

(Page replaced 4/18/97)

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

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

**DRAFT 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	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	N/A	N/A	62-296.405(1)(a)	A.5. & A.6.
	(22 MW Turbine-generator) (each unit)	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.
		SO <sub>2</sub>	No. 6 - No. 2 F.O.	8760	1.3 lb/MMBtu	N/A	N/A	390.0	1,708.20	Applicant Request	A.10.
			Natural Gas	8760	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	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	N/A	N/A	62-296.405(1)(a)	B.5.
	(44 MW Turbine-generator)	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	62-200.700(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.
		SO <sub>2</sub>	No. 6 - No. 2 F.O.	8760	1.87 lb/MMBtu	N/A	N/A	1,161.27	5,086.36	62-296.405(1)(c)1.h.	B.9.
			Natural Gas	8760	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.			1,161.27	5,086.36	Applicant Request	B.10.
-008	Combustion Turbine No. 1 (228 MMBtu/hour)	VE	No. 2 F.O.	6993	Less than 20%	N/A	N/A	N/A	N/A	62-296.320(4)(b)	D.5.
			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 (228 MMBtu/hour)	SO <sub>2</sub>	No. 2 F.O.	6993	0.4% sulfur	N/A	N/A	97.4	340.6	AO65-242827	D.6.
			Natural Gas	6993	N/A	N/A	N/A	N/A	N/A	N/A	N.A.
-011	Auxiliary Boiler	VE	Natural Gas	2000	Less than 20%	N/A	N/A	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.

**Notes:**

\* The "Equivalent Emissions" listed are for informational purposes.

\*\* PM - SB refers to "soot blowing" and "load change".

**Table 2-1, Summary of Compliance Requirements**

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

**DRAFT 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 Base	Min. Compliance Test	CMS <sup>1</sup>	See Permit Condition(s)
					Frequency	Date <sup>2</sup>	Duration		
-005	Boiler No. 5	VE	No. 6 - No. 2 F.O.	DEP method 9	Annually <sup>3</sup>	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 <sup>3</sup>	7/1 - 9/30	60 Minutes	No	C.7., C.10. - 15., C.17.
			Natural Gas	17, 5, 5B or 5F	Annually <sup>3</sup>	7/1 - 9/30	60 Minutes	No	
		SO <sub>2</sub>	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	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.	1, 2, 3 & 5, or 17	Annually <sup>3</sup>	7/1 - 9/30	60 Minutes	No	C.7., C.10. - 15., C.17.
			Natural Gas	1, 2, 3 & 5, or 17	Annually <sup>3</sup>	7/1 - 9/30	60 Minutes	No	
		SO <sub>2</sub>	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 <sup>4</sup>	7/1 - 9/30	30 Minutes	No	D.13. - D.16.
-009	Combustion Turbine No. 2		Natural Gas	EPA Method 9	Annually <sup>4</sup>	7/1 - 9/30	30 Minutes	No	
		SO <sub>2</sub>	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		30 Minutes	No	E.15. - E.19.
		PM	Natural Gas	N/A	N/A	N/A	N/A	No	N/A
		SO <sub>2</sub>	Natural Gas	N/A	N/A	N/A	N/A	No	N/A

**Notes:**

<sup>1</sup> CMS [=] continuous monitoring system.

<sup>2</sup> Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

<sup>3</sup> Test not required in years that fuel oil is fired less than 400 hours.

<sup>4</sup> 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.



ELECTRIC OPERATIONS  
2602 JACKSON BLUFF RD.  
TALLAHASSEE, FL 32304

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**

April 16, 1997

Mr. Scott Sheplak, P.E.  
Professional Engineering Administrator  
Division of Air Resources Management  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Mail Stop 5500  
Tallahassee, Florida 32399-2400

**Re: Sam O. Purdom Generating Station Title V Permit Application  
Permit Number 1290001-001-AV**

Dear Mr. Sheplak:

This letter is being provided to the Florida Department of Environmental Protection confirming the City of Tallahassee's request for a Title V Permit limit of 1.7 percent sulfur content in liquid fuel oil fired in Boiler No. 7 in order to meet the 1.87 lb/mmBtu sulfur dioxide limit. Compliance with the 1.7 percent sulfur content will be demonstrated with vendor-supplied data. Attached are revised pages from the Sam O. Purdom Generating Station Title V Permit Application (original submitted on June 14, 1996; 1<sup>st</sup> revision submitted on December 20, 1996; 2<sup>nd</sup> revision submitted on March 21, 1997) reflecting this requested allowable limit. Also attached are the revised draft permit pages reflecting this request. It is our understanding that you will issue a revised draft permit that will contain the requested changes prior to the City's publication of the "Public Notice of Intent to Issue Title V Air Operation Permit" scheduled for April 24, 1997. Please send us a copy of the revised draft permit as soon as it becomes available.

We have additional comments regarding the draft permit that we will be submitting by Friday, April 18, 1997. It is our understanding from previous conversations that these comments should not warrant an additional public notice and that the Notice being published on April 24<sup>th</sup> will be sufficient.

**RECEIVED**

**APR 17 1997**

**BUREAU OF  
AIR REGULATION**

If you have any questions regarding this request for a fuel oil sulfur content limit, please feel free to contact either myself at (904) 891-5534 or Jennette Curtis, Environmental Administrator at (904) 891-8850.

Yours Truly,

A handwritten signature in black ink, appearing to read "R. McGarrah", written in a cursive style.

Robert McGarrah, Superintendent  
Electric Production Division  
Responsible Official

Attachments

cc: Jonathan Holtom, FDEP  
Jeffrey Brown, FDEP, OGC  
G. King, COT  
D. Curtis, COT

**Emissions Unit Information Section 7 of 7**

**Segment Description and Rate: Segment 2 of 5**

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):  <b>No. 6 Fuel Oil</b>	
2. Source Classification Code (SCC): <b>10100401</b>	
3. SCC Units: <b>Gallons</b>	
4. Maximum Hourly Rate: <b>4140</b>	5. Maximum Annual Rate: <b>36.3 x 10<sup>6</sup></b>
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur: <b>1.7*See Field 10 A</b>	8. Maximum Percent Ash:
9. Million Btu per SCC Unit: <b>0.15</b>	
10. Segment Comment (limit to 200 characters):  <b>Maximum Hourly and Annual Rates based on 8760 hours per year operation.</b>  <del>*This unit is operated in accordance with allowable limits contained in its operating permit. No limitation applies to maximum percent sulfur. Upon receipt of information pertaining to the sulfur content of fuels, the City of Tallahassee co-fires fuels as necessary to meet the sulfur dioxide emissions limitation. Thus, the City of Tallahassee maintains no expectation regarding the maximum percent sulfur in any single fuel.</del>	



Emissions Unit Information Section 7 of 7

Segment Description and Rate: Segment 3 of 5

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):  <b>On-Spec Used Oil</b>	
2. Source Classification Code (SCC): <b>10100401</b>	
3. SCC Units: <b>Gallons</b>	
4. Maximum Hourly Rate: <b>4140</b>	5. Maximum Annual Rate: <b>10,000</b>
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur: <b><u>1.7</u>*See Field 10</b>	8. Maximum Percent Ash:
9. Million Btu per SCC Unit: <b>0.15</b>	
10. Segment Comment (limit to 200 characters):  <b>Maximum Hourly and Annual Rates based on 8760 hours per year operation.</b>  <del>*This unit is operated in accordance with allowable limits contained in its operating permit. No limitation applies to maximum percent sulfur. Upon receipt of information pertaining to the sulfur content of fuels, the City of Tallahassee co-fires fuels as necessary to meet the sulfur dioxide emissions limitation. Thus, the City of Tallahassee maintains no expectation regarding the maximum percent sulfur in any single fuel.</del>	

Emissions Unit Information Section 7 of 7

Segment Description and Rate: Segment 4 of 5

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):  <b>Distillate Fuel Oils</b>	
2. Source Classification Code (SCC):	
3. SCC Units: <b>Gallons</b>	
4. Maximum Hourly Rate: <b>4705</b>	5. Maximum Annual Rate: <b>4.12 x 10<sup>7</sup></b>
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur: <b><u>1.7</u>*See Field 10</b>	8. Maximum Percent Ash:
9. Million Btu per SCC Unit: <b>0.132</b>	
10. Segment Comment (limit to 200 characters):  <b>Maximum Hourly and Annual Rates based on 8760 hours per year operation.</b>  <del>*This unit is operated in accordance with allowable limits contained in its operating permit. No limitation applies to maximum percent sulfur. Upon receipt of information pertaining to the sulfur content of fuels, the City of Tallahassee co-fires fuels as necessary to meet the sulfur dioxide emissions limitation. Thus, the City of Tallahassee maintains no expectation regarding the maximum percent sulfur in any single fuel.</del>	

Emissions Unit Information Section 7 of 7

Segment Description and Rate: Segment 5 of 5

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):  <b>Any mixture of Fuel Oil No.6 (Residual Oil) ,On-Spec Used Oil, Distillate Fuel Oil, or Natural Gas</b>	
2. Source Classification Code (SCC):	
3. SCC Units: <b>Gallons</b>	
4. Maximum Hourly Rate: <b>4140 / 0.621</b>	5. Max. Annual Rate: <b><math>3.63 \times 10^7 / 5.4 \times 10^3</math></b>
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur: <b><u>1.7</u>*See Field 10</b>	8. Maximum Percent Ash:
9. Million Btu per SCC Unit: <b>0.15 / 1000</b>	
10. Segment Comment (limit to 200 characters):  <b>Maximum Hourly and Annual Rates based on 8760 hours per year operation and operating usages for Fuel Oil No.6. The purpose of this segment is to indicate the potential to co-fire multiple fuels. In order to provide maximum hourly rates for the co-firing of a liquid and gaseous fuel, the maximum of each fuel is provided.</b>  <del>*This unit is operated in accordance with allowable limits contained in its operating — permit. No limitation applies to maximum percent sulfur. Upon receipt of — information pertaining to the sulfur content of fuels, the City of Tallahassee co-fires — fuels as necessary to meet the sulfur dioxide emissions limitation. Thus, the City of — Tallahassee maintains no expectation regarding the maximum percent sulfur in any — single fuel.</del>	

**Emissions Unit Information Section 7 of 7**

**Allowable Emissions** (Pollutant identified on front of page)

**A.**

1. Basis for Allowable Emissions Code: <b>RULE</b>
2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>1.87 lb/mmBtu; <u>Sulfur content of 1.7 percent or less, by weight, in liquid fuel oil.</u></b>
4. Equivalent Allowable Emissions: <b>1.2 x 10<sup>3</sup> lb/hour</b> <b>5.1 x 10<sup>3</sup> tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Records of fuel oil sulfur content as received by vendor are maintained and kept available for Department Inspections.</b>
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):  <b>Emissions limitation entered in Field 3 (<u>1.87 lb/mmBtu</u>) reflects the maximum allowable emission rate listed in Specific Condition No. 4 in current operating Permit No. AO65-242831. This requirement is found in 62-296.405(1)(c)1,h, F.A.C.</b>

**B.**

1. Basis for Allowable Emissions Code:
2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:
4. Equivalent Allowable Emissions:
5. Method of Compliance (limit to 60 characters):

**Excess Emissions**

A.13. See common conditions C.1. - C.3.

**Monitoring of Operations**

A.14. 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.11., C.8. and C.9.  
[Rule 62-296.405(1)(f)1.b., F.A.C.]

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

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

A.18. Sulfur Dioxide. See specific condition A.14. and common conditions C.8. and C.9.

A.19. Operating Rate During Testing. See common condition C.11.

A.20. Calculation of Emission Rate. See common condition C.12.

A.21. Applicable Test Procedures. See common condition C.13.

A.22. Required Stack Sampling Facilities. See common condition C.14.

A.23. Frequency of Compliance Tests. See common condition C.15.

**Recordkeeping and Reporting Requirements**

A.24. See common conditions C.18. - C.20.

**Reasonable Assurances**

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.]

AT THIS TIME

UNTIL BOILERS  
NUMBER 5 AND  
NUMBER 6 ARE  
PERMANENTLY  
SHUT-DOWN OR  
SEPARATE PIPING  
IS INSTALLED

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

Excess Emissions

B.11. See common conditions C.1. - C.3.

B.10. SULFUR DIOXIDE - SULFUR CONTENT. THE FUEL OIL SULFUR CONTENT SHALL NOT EXCEED 1.7 PERCENT, BY WEIGHT. SEE SPECIFIC CONDITION B.10. AND COMMON CONDITION C.9. [RULE 62-296.405(1)(e)3., FAC; AND, REQUESTED IN A LETTER BY APPLICANT DATED APRIL 16, 1997.]

\*NOTE: RENUMBER SUBSEQUENT CONDITIONS ACCORDINGLY.

**Monitoring of Operations**

{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
NOx	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.]

B.12. Sulfur Dioxide. For Boilers Number 5, <sup>AND NUMBER 7</sup> and Number 6, 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. Because Boilers Number 5, Number 6 and Number 7 are supplied by a common fuel oil pipe-line, <sup>AT THIS TIME</sup> demonstration of the sulfur dioxide emissions limit for Boiler Number 7 <sup>WILL BE</sup> is assured by the use of fuel oil specified for Boilers Number 5 and Number 6. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions B.9., C.8. and C.9. <sup>UNTIL THESE UNITS ARE PERMANENTLY SHUTDOWN OR SEPARATE PIPING IS INSTALLED</sup>

[Rule 62-296.405(1)(f)1.b., F.A.C.; and, requested by applicant in letter dated March 21, 1997.]

B.13. 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.14. Visible Emissions. See common conditions C.5., C.6. and C.16.

B.15. Particulate Matter. See common conditions C.7. and C.17.

B.16. Sulfur Dioxide. See specific condition B.12 and common conditions C.8. and C.9.

B.17. Operating Rate During Testing. See common condition C.11.

B.18. Calculation of Emission Rate. See common condition C.12.

B.19. Applicable Test Procedures. See common condition C.13.

B.20. Required Stack Sampling Facilities. See common condition C.14.

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

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

**DRAFT 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. 2 - No. 6 F.O.	8760	20%; 40% - 1 two min. period/hr.	N/A	N/A	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	N/A	N/A	62-296.405(1)(a)	A.5. & A.6.
	(22 MW Turbine-generator) (each unit)	PM	No. 2 - No. 6 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. 2 - No. 6 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.
		SO <sub>2</sub>	No. 2 - No. 6 F.O.	8760	1.3 lb/MMBtu	N/A	N/A	390.0	1,708.20	Applicant Request	A.10.
			Natural Gas	8760	N/A	N/A	N/A	N/A	N/A	62-296.405(1)(c)	A.10.
		% Sulfur	No. 2 - No. 6 F.O.	8760	1.3 lb/MMBtu	N/A	N/A	390.0	1,708.20	Applicant Request	A.11.
-007	Boiler #7 (621 MMBtu/hour)	VE	No. 2 - No. 6 F.O.	8760	20%; 40% - 1 two min. period/hr.	N/A	N/A	N/A	N/A	62-296.405(1)(a)	B.5.
	<b>Acid Rain Phase II Unit</b>		Natural Gas	8760	20%; 40% - 1 two min. period/hr.	N/A	N/A	N/A	N/A	62-296.405(1)(a)	B.5.
	(44 MW Turbine-generator)	PM	No. 2 - No. 6 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. 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.
		SO <sub>2</sub>	No. 2 - No. 6 F.O.	8760	1.87 lb/MMBtu	N/A	N/A	1,161.27	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. 2 - No. 6 F.O.	8760	N/A	N/A	1,161.27	5,086.36	Applicant Request	B.10.	
-008	Combustion Turbine No. 1 (228 MMBtu/hour)	VE	No. 2 F.O.	6993	Less than 20%	N/A	N/A	N/A	N/A	62-296.320(4)(b)	D.5.
			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 (228 MMBtu/hour)	SO <sub>2</sub>	No. 2 F.O.	6993	0.4% sulfur	N/A	N/A	97.4	340.6	AO65-242827	D.6.
			Natural Gas	6993	N/A	N/A	N/A	N/A	N/A	N/A	N.A.
-011	Auxiliary Boiler	VE	Natural Gas	2000	Less than 20%	N/A	N/A	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.

**Notes:**

\* The "Equivalent Emissions" listed are for informational purposes.

\*\* PM - SB refers to "soot blowing" and "load change".