

AGENDA  
CITY OF TALLAHASSEE PURDOM UNIT 8  
OCTOBER 30, 1997

CRAWFORDVILLE ELEMENTARY SCHOOL  
CAFETERIA

- 7:00 p.m.     Introduction (Howard Rhodes, Director, Division of Air Resources Management)  
  
                  Introduce all DEP staff; explain purpose of meeting.
- 7:05 p.m.     Public Participation Process (Jeff Brown)  
  
                  Discuss the legal process and rule provisions for public interaction in the permitting process.
- 7:15 p.m.     Construction Permit Process (Al Linero)  
  
                  Summarize the permitting events that have occurred to date in the Purdom Unit 8 construction permit application process
- 7:25 p.m.     Air Permit Details (Marty Costello)  
  
                  Best Available Control Technology (BACT) required on Purdom Unit 8
- 7:40 p.m.     Ambient Air Impact/Modeling (Cleve Holladay)  
  
                  Summarize Air Impacts and Modeling Results
- 7:50 p.m.     Public Comments
- 10:00 p.m.    Adjourn

Note: Department and City of Tallahassee staff will also be available from 4:00 to 7:00 p.m to discuss and explain the project on an informal basis

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City of Tallahassee  
300 S. Adams St.  
Tallahassee, FL  
32301

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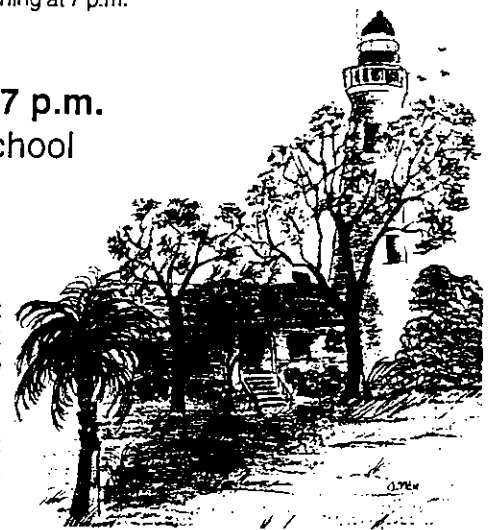


### Open House on the Purdom Unit 8 Project

The city of Tallahassee's Electric Utility and the Florida Department of Environmental Protection (DEP) invite you to attend an open house on the proposed electric generating unit at the existing Purdom Generating Station in St. Marks, Florida. City and DEP personnel will be present to receive comments, discuss the project, and answer questions. DEP will also conduct a public meeting about Unit 8's air quality permit beginning at 7 p.m.

**Thursday, October 30, 4 - 7 p.m.**  
Crawfordville Elementary School  
69 Arran Road  
Crawfordville, Florida

For more information, call the Electric Utility at 891-5585, e-mail [purdom8@sc.ci.th.fl.us](mailto:purdom8@sc.ci.th.fl.us) or visit the Purdom Unit 8 site on the World Wide Web at <http://www.state.fl.us/cityth/purdom8/>. If you have a disability requiring special accommodations, contact the Electric Utility at 891-5585 or Florida Relay Services TDD at 1-800-955-8771.



artwork by Ouida Vick

## Serving Wakulla County For More Than A Century

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### **Purdom Meeting To Be Held Oct. 30**

The Florida Department of Environmental Protection (DEP) and officials from the City of Tallahassee will be in Crawfordville Thursday, Oct. 30 at the request of the Wakulla County Commission.

State and city officials will discuss the Sam O. Purdom Power Plant in St. Marks and the city's plan to expand the operation. Wakulla officials requested the meeting to get more information about the plant. County commissioners are unhappy with City of Tallahassee officials' lack of desire to compensate the county in lieu of taxes.

The meeting will be held at the Crawfordville Elementary School cafeteria from 7 p.m. until 10 p.m.

Howard Rhodes, director of the Division of Air Resources Management, will introduce DEP staff and will be followed by Jeff Brown

Please turn to Page 14

### **Purdom**

Continued from Page 1

discussing the legal process and the rule provisions for public interaction in the permitting process.

At 7:15 p.m., Al Linero will discuss the construction permitting events that have occurred in the Purdom process. Mary Costello will discuss air permit details and the Best Available Control Technology required on Purdom Unit 8.

At 7:40 p.m., Cleve Holliday will summarize air impacts and the modeling of the plant.

Public comment will be taken at 7:50 p.m. and the meeting will adjourn at 10 p.m. DEP and the City of Tallahassee staff will also be available from 4 p.m. until 7 p.m. to discuss and explain the project on an informal basis.

Wakulla County Commissioners have expressed environmental and monetary concerns over the Purdom project but have not filed a lawsuit against the City of Tallahassee.

A lawsuit filed by a citizens group challenging the project was recently dropped after the city announced plans to do a market survey of other possible energy sources. The plant was originally built in 1952.

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The multi-media computers  
will be on display on the first  
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a.m.

The interactive kiosk will pro  
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government and services, Flori  
da's state parks, tourist opportu  
nities, and area maps — all at  
the touch of a finger.

Internet-based, these comput  
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technology, allowing easy access  
and update.

Leon County commissioners  
Gary Yordon and Rudy Maloy,  
Wayne Stevens of the Florida  
Parks and Recreation and  
Charles Wright of the Leon Coun  
ty Tourist Development Council  
will be on hand for this morning's  
opening.

**LOTTERY**

**Tallahassee ticket  
one of 10 big winners**

Ten tickets, including one  
purchased in Tallahassee,  
matched all five numbers in

**CORRECTION**

An incorrect date for an open  
house on the Purdom Unit 8 pow  
er project was given in Tuesday's  
*Democrat*.

The City of Tallahassee and  
the state Department of Environ  
mental Protection are holding an  
open house on the project Oct. 30  
at Crawfordville Elementary  
School, 69 Arran Road,  
Crawfordville.

The open house will begin at  
4 p.m. City utilities and DEP per  
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From 7 to 8 p.m., DEP will take  
questions specifically on the pro  
ject's effect on local air quality.

— *Democrat staff reports*

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**FIGATION**

*Tallahassee Dem  
ocrat* report did not include the  
name of Saxton Randall Jones in  
a list of Tallahassee law-enforce  
ment officers whose names are  
on the wall of the National Law  
Enforcement Officers Memorial  
in Washington, D.C. Jones was a  
Florida Highway Patrol captain  
who died May 1, 1995, while  
cleaning his gun at home. His  
name was added to the national  
memorial in May 1997.

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— *Democrat staff reports*

10/1/97

**POWER PLANT**

**Hearing is set  
on Purdom expansion**

At the request of Wakulla  
County, the city of Tallahassee  
and the Department of Environ  
mental Protection are having  
an open house on the Purdom  
Unit 8 project today at Craw  
fordville Elementary School, 69  
Arran Rd., Crawfordville.

The open house will begin at  
4 p.m. City utilities and DEP  
personnel will be available to  
answer questions about the pro  
ject. Between 7 and 8 p.m., DEP  
will take questions specifically  
on the project's effect on local  
air quality.

The proposed generator will  
be built at the Sam O. Purdom  
Power Plant in St. Marks. It is a  
250-megawatt natural gas burn  
ing combined cycle unit. DEP  
recommended approval of Unit  
8 last week.

**LEON COUNTY COMMISSION**

**Scott Maddox**

■ **Traffic calculations:** Commission  
ers also delayed a decision on whether  
to change how the county calcu  
lates whether a roadway is congested  
or not. Several citizens spoke  
against the proposed change, which  
proponents say would make it eas  
ier for developers to move ahead on  
their projects. Commissioners  
wanted the Tallahassee-Leon County  
planning commission to first weigh

the county's human services budget to  
supplement the salary for a physi  
cian and to pay for medical supplies.  
The sum is in addition to the  
\$150,000 in state funds the county al  
ready funneled to the clinic this  
year. Commissioner Bruce Host voted  
against the measure, saying coun  
ty health officials had not been con  
sulted about the expenditure.

Commission meetings are tele  
vised on Comcast cable Channel 25

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STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL PROTECTION  
NOTICE OF PUBLIC MEETING

The Department of Environmental Protection gives notice that a public meeting will be held regarding the Department's intent to issue a Prevention of Significant Deterioration of Air Quality Permit (PSD Permit) to the City of Tallahassee for construction of a nominal 250 megawatt (MW) natural gas-fired combustion turbine and heat recovery steam generator at the Purdom Generating Station in St. Marks, Wakulla County.

The meeting will be held at 7:00 p.m. on Thursday, October 30, 1997 at Crawfordville Elementary School, 69 Arran Road, Crawfordville. Department and City of Tallahassee staff will also be available from 4:00 to 7:00 p.m. to discuss and explain the project on an informal basis. The Department will then formally receive oral or written comments on issues related to the proposed PSD permit which was publicly noticed on August 7 in the Tallahassee Democrat.

The Public Notice, Intent to Issue, Technical Evaluation and Preliminary Determination, draft Best Available Control Technology (BACT) determination, and the draft PSD permit are available for review at the Office of the Wakulla County Board of County Commissioners. The same materials and the complete application and official file are available for review during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays at the Bureau of Air Regulation, 111 S. Magnolia Drive, Tallahassee. For additional details contact Marty Costello, P.E. or Cleve Holladay, Meteorologist at (850/488-1344).

A formal Site Certification Hearing covering all environmental disciplines will commence on November 18, 1997 in St. Marks and will be noticed separately.

SEPTEMBER 29, 1997

044604



CITY OF TALLAHASSEE

FOR IMMEDIATE RELEASE:

September 25, 1997

# NEWS RELEASE

**CONTACT:**

Melanie Mowry, Dept. of Comm.  
891-8533 or  
J. Sam Bell, asst. city manager-Utilities  
891-8200

## Purdom Unit 8 Open House Scheduled

30 Purdom

The city of Tallahassee will be on hand at the Department of Environmental Protection's (DEP) open house on the Purdom Unit 8 project which will take place on October 30, at Crawfordville Elementary School. The school's address is 69 Arran Road. The open house will begin at 4 p.m. with city electric and DEP personnel on hand to answer questions about the project. Between 7-8 p.m., DEP will take questions and comments specifically on the project's air quality.

The proposed generator will be built at the city's Sam O. Purdom Power Plant in St. Marks. It is a 250 megawatt natural gas burning combined cycle unit, which is considered to be extremely friendly to the environment. Unit 8 will not increase emissions of air pollutants which contribute to acid rain.

"The city of Tallahassee has been working hard over the past year to inform the public about this environmentally responsible project, Purdom Unit 8. We are excited about the opportunity to continue to inform the people of Wakulla and Leon Counties about Unit 8's benefits," said J. Sam Bell, assistant city manager-Utility Services. "We know this project is environmentally sensitive while remaining the least cost alternative for our customers."

Last week, DEP recommended approval of Unit 8. This open house is being held at the request of Wakulla County.

The formal site certification hearing for Purdom Unit 8 will be held November 18-21 at the St. Marks Community Center. The governor and Cabinet are expected to make the final decision on this project in the spring of 1998.

Department of Communications • Public Information Office • City Hall • Tallahassee, FL 32301-1731  
Phone: 850/891-8533 #fax: 850/891-8777

# CONSTRUCTION AND OPERATION

DATE: November 18, 1997  
 TIME: 9:00 a.m. (Public comments commencing at 7:00 p.m.)  
 PLACE: St. Marks Community Center  
 46 Shell Island Road  
 St. Marks, Florida

1. Application No. 52-55 for certification to authorize construction and operation of an electrical power plant in the City of St. Marks, Wakulla County, Florida, is now pending before the State of Florida, Department of Environmental Protection ("Department"), pursuant to the Florida Electrical Power Plant Siting Act, Part II, Chapter 433, Florida Statutes. The application was filed by the City of Tallahassee on March 7, 1997.

2. The City of Tallahassee proposes to construct and operate a new 250 (nominal) megawatt (primarily natural gas-fired) with low sulfur oil as the secondary fuel) combined cycle generating unit, to be known as Pundum Unit 5, at its existing San O Pundum Generating Station site in the City of St. Marks, Wakulla County, Florida. The existing San O Pundum Generating Station site is located on 65 acres within the City of St. Marks approximately two miles south of U.S. Highway 98. It is bounded on the west by State Road 363 and on the east by the St. Marks River. Certification also is requested for the existing San O Pundum Generating Station site, existing natural gas and oil-fired generating units at that site, supporting onsite equipment and facilities, office buildings, four of two existing transmission lines within Wakulla and Leon Counties, Florida, and a new 0.9-mile reclaimed water pipeline to be constructed from the City of St. Marks Wastewater Treatment Facility to the Pundum Station. Pundum Unit 5 will consist of a combustion turbine/generator, a heat recovery steam generator, and a reheat steam turbine/generator. Other principal features of the new facility will include a mechanical draft cooling tower, a stormwater retention pond, relocation and upgrading of onsite natural gas facilities, and transfer of the construction of the north end of the existing natural gas lateral pipeline from an existing 30-inch main pipeline to an existing 36-inch main pipeline in the same vicinity.

3. Pursuant to Section 433.508, Florida Statutes, the certification hearing will be held by the Division of Administrative Hearings beginning at 9:00 a.m. on November 18, 1997, at the St. Marks Community Center, 46 Shell Island Road, St. Marks, Florida. This hearing is being held in order to take written and oral testimony and other evidence in the ethics of the proposed project and any other matter appropriate in the consideration of the site. Need for the facility has been predetermined by the Public Service Commission at a separate hearing. Pursuant to Sections 433.5055(1), 433.507(3), and 433.503(8), Florida Statutes, any person for an administrative hearing on a permit to be issued by the Department pursuant to a judicially-delegated or approved program will be consolidated with the certification hearing. Members of the public may offer comments on the project on Tuesday, November 18, 1997, commencing at 7:00 p.m.

4. The Department and other state, regional and local agencies have evaluated and prepared a report on the project. The Department has prepared a report on the project, pursuant to Section

405.507(4), Florida Statutes. That report is available for public review at the locations listed below. Certification of the project would allow construction and operation of a new source or an addition which would consume an increment of air quality resources. The Department's review has resulted in an assessment of the prevention of significant deterioration increments and ambient air quality impacts and a determination of the Best Available Control Technology necessary to control the emission of air pollutants from Pundum Unit 5. Certification of the project by the Governor and Cabinet, sitting as the Power Plant Siting Board, would allow construction and operation subject to the conditions of certification set forth in the final certification order. The application for certification which more specifically depicts the facilities is available for public inspection at the addresses listed below.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
 Office of Siting Coordination  
 2720 Blue Stone Road  
 Suite 11  
 Tallahassee, Florida 32399  
 (904) 487-0472

CITY OF TALLAHASSEE  
 Office of the Treasurer/Clerk  
 Second Floor - City Hall  
 300 South Adams Street  
 Tallahassee, Florida 32301

CITY OF ST. MARKS  
 City Hall  
 788 Port Leon Drive  
 St. Marks, Florida 32355

LERROY COLLINS LEON  
 COUNTY PUBLIC LIBRARY  
 Reference Desk  
 200 West Park Avenue  
 Tallahassee, Florida 32301

WAKULLA COUNTY  
 PUBLIC LIBRARY  
 Reference Section  
 4330 Crawfordville Highway  
 Crawfordville, Florida 32326

The business address of the applicant for the project is:

CITY OF TALLAHASSEE  
 Leo Jermette Curtis, Environmental Administrator  
 Utility Services, Third Floor, City Hall  
 300 South Adams Street  
 Tallahassee, Florida 32301  
 (904) 591-8850  
 Fax No. (904) 591-8277

5. Pursuant to Section 403.509(4), Florida Statutes, the City of Tallahassee intends for the proposed reclaimed water pipeline to use or cross over water of the following agencies: City of St. Marks, Florida (wastewater treatment plant site and street rights-of-way), and State of Florida, Department of Transportation (Tallahassee-St. Marks Division, Railroad State Trail and State Road 363). The administrative law judge will receive comments and testimony from the parties, the public, and the affected agencies at the certification hearing.

6. Pursuant to Section 403.508(4), Florida Statutes

all parties to the proceeding shall include: the City of Tallahassee; the Public Service Commission; the Department of Community Affairs; the Game and Fresh Water Fish Commission; the Northwest Florida Water Management District; the Department of Environmental Protection; the Apalachee Regional Plan-

ning Council; the local government; and those who timely intervene in the proceeding.

(b) Any party listed in paragraph (a) other than the Department of the applicant may waive its right to participate in these proceedings. If such listed party fails to file a notice of its intent to be a party on or before the 90th day prior to the certification hearing, such party shall be deemed to have waived its right to be a party.

(c) Upon the filing with the administrative law judge of a notice of intent to be a party by June 10, 1997, the following shall also be parties to the proceedings:

1. Any agency not listed in paragraph (a) as to matters within its jurisdiction.

2. Any domestic non-profit corporation or association formed in whole or in part to promote conservation of natural resources to protect the environment, personal health, or other biological values; to preserve historical sites; to promote consumer interests; to represent labor, commercial, or industrial groups; or to promote comprehensive planning or orderly development in the area in which the proposed electrical power plant is to be located.

(d) Notwithstanding paragraph (c), failure to designate a party in subparagraph (c)(1), to file a notice of intent to be a party within the time provided herein shall constitute a waiver of the right of the agency to participate as a party in the proceeding.

(e) Other parties may include any person, including those persons enumerated in paragraph (c), who have failed to timely file a notice of intent to be a party, whose substantial interests are being affected and being determined by the proceeding and who timely file a motion to intervene pursuant to Chapter 120, Florida Statutes, and applicable rules. Intervention pursuant to this paragraph may be granted at the discretion of the designated administrative law judge and upon such conditions as he may prescribe any time prior to 30 days before the commencement of the certification hearing.

(f) Any agency, including those whose priorities of work are being affected pursuant to Section 403.509(4), Florida Statutes, shall be made a party upon the request of the Department or the applicant.

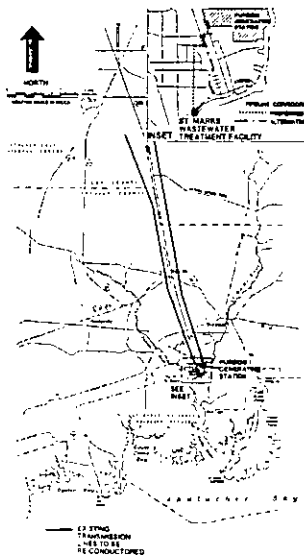
7. When appropriate, any person may be given an opportunity to present oral or written communications to the designated administrative law judge. If the designated administrative law judge proposes to consider such communications, then all parties shall be given an opportunity to cross-examine or challenge or rebut such communications. Written comments by non-parties may be sent to the designated administrative law judge and must be furnished to all parties on or before November 12, 1997. Any prefiled written testimony of the parties must be available for public inspection at the locations listed in paragraph 4 above, and furnished to all parties on or before November 12, 1997.

8. Notices, comments or petitions made prior to the hearing shall be made in writing to:

Honorable P. Michael Raff  
 Administrative Law Judge  
 Division of Administrative Hearings  
 The DeSoto Building  
 1230 Apalachee Parkway  
 Tallahassee, Florida 32399-3060  
 Fax No. (850) 921-6847

Copies of such materials should be forwarded by mail or telephone facsimile to existing parties, including the Department of Environmental Protection and the City of Tallahassee. The Division of Administrative Hearings case number is 97-001350EPP.

9. Those wishing to intervene in these proceedings, unless appearing on their own behalf, must be represented by an attorney or other person who can be determined to be qualified to appear in administrative hearings pursuant to Chapter 120, Florida Statutes, and applicable rules.



Lo's 2/16



CLAIR



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

SCOTT MADDOX  
Mayor  
STEVE MEISBURG  
Mayor Pro Tem

JOHN PAUL BAILEY  
Commissioner  
DEBBIE LIGHTSEY  
Commissioner  
RON WEAVER  
Commissioner

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

JAMES R. ENGLISH  
City Attorney  
RICARDO FERNANDEZ  
City Auditor

**CERTIFIED MAIL NO. P483 230 315**

December 15, 1997

Mr. Howard Rhodes, Director  
Division of Air Resources Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road, Mail Stop 5500  
Tallahassee, Florida 32399-2400

**RECEIVED**

DEC 19 1997

DIVISION OF AIR  
RESOURCES MANAGEMENT

**Re: Initial Performance Test Report and Professional Engineer Conformity  
Certification  
Auxiliary Boiler - Construction Permit No. 1290001-002-AC  
Sam O. Purdom Generating Station**

Dear Mr. Rhodes:

This report is submitted to the Department presenting results of initial performance testing of an auxiliary boiler located at the Sam O. Purdom Generating Station located at 667 Port Leon Drive, St. Marks, Wakulla County, Florida. The results show compliance with the permitted visible emissions standard of 20 percent opacity. In addition, in accordance with Specific Condition No. 12 of the above-referenced permit, the emission unit has been inspected for conformity by a Professional Engineer, registered in the State of Florida. Attached is a statement, sealed by the engineer, certifying the conformity.

If you have any questions regarding the performance testing results or the conformity certification, please feel free to contact either myself at (850) 891-5534 or Jennette Curtis at (850) 891-8850.

Yours Truly,

Robert McGarrah, Superintendent  
Electric Production Division  
Responsible Official

cc: Ben Cowart, COT  
Gordon King, COT  
Jennette Curtis, COT  
Karl Bauer, COT  
Hal Avery, COT

VISIBLE EMISSION OBSERVATION FORM 1

Form Number	P A B O 1	Page	1	Of	2
Continued on VEO Form Number			P A B O 2		

Method Used (Circle One)  
 Method 9      203A      203B      Other: \_\_\_\_\_

Company Name  
 City of Tallahassee

Facility Name  
 Sam O. Purdom Generating Station

Street Address  
 667 Port Leon Drive

City  
 St. Marks

State  
 FL

Zip  
 32355

Process  
 Aux. Steam Boiler

Unit #  
 12

Operating Mode  
 15:99 mcfh

Control Equipment  
 NONE

Operating Mode  
 N/A

Describe Emission Point  
 24" dia. Metal Stack

Height of Emis. Pt.  
 Start 30' End 30'

Height of Emis. Pt. Rel. to Observer  
 Start 25' End 25'

Distance to Emis. Pt.  
 Start ~85' End ~85'

Direction to Emis. Pt. (Degrees)  
 Start ~21° End ✓

Vertical Angle to Obs. Pt.  
 Start 17° End 17°

Direction to Obs. Pt. (Degrees)  
 Start ~21° End ✓

Distance and Direction to Observation Point from Emission Point  
 Start 1'; 0° End 1'; 0°

Describe Emissions  
 Start NONE End N/A

Emission Color  
 Start N/A End N/A

Water Droplet Plume  
 Attached  Detached  None

Describe Plume Background  
 Start SKY End SKY

Background Color  
 Start BLUE End BLUE

Sky Conditions  
 Start Clear End Clear

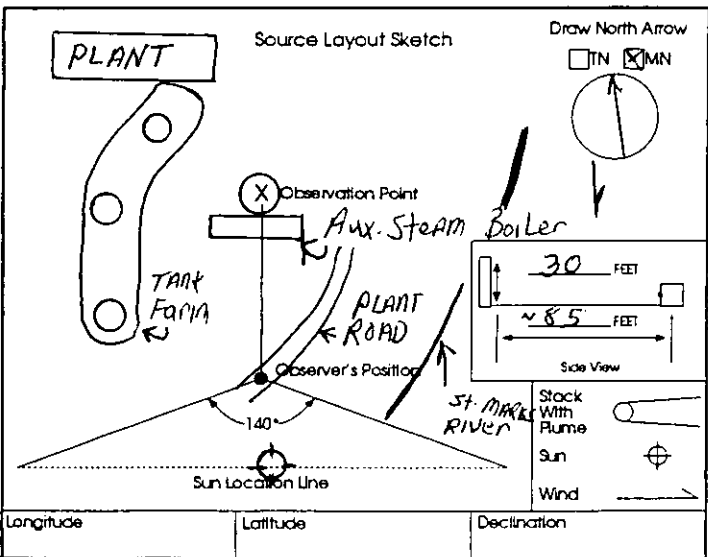
Wind Speed  
 Start 1-3 End 3-5

Wind Direction  
 Start SE End SE

Ambient Temp.  
 Start 67 End 68

Wet Bulb Temp.  
 Start 57 End 52

RH Percent



Additional Information  
 Unit Operating ON 100% Natural GAS

Permit No. 129 0001-002-AC

Sec Min	Time Zone				Start Time	End Time	Comments
	0	15	30	45			
	11-15-97 Eastern				12:20 PM	1:19 PM	
1	0	0	0	0			
2	0	0	0	0			
3	0	0	0	0			
4	0	0	0	0			
5	0	0	0	0			
6	0	0	0	0			
7	0	0	0	0			
8	0	0	0	0			
9	0	0	0	0			
10	0	0	0	0			
11	0	0	0	0			
12	0	0	0	0			
13	0	0	0	0			
14	0	0	0	0			
15	0	0	0	0			
16	0	0	0	0			
17	0	0	0	0			
18	0	0	0	0			
19	0	0	0	0			
20	0	0	0	0			
21	0	0	0	0			
22	0	0	0	0			
23	0	0	0	0			
24	0	0	0	0			
25	0	0	0	0			
26	0	0	0	0			
27	0	0	0	0			
28	0	0	0	0			
29	0	0	0	0			
30	0	0	0	0			

# VISIBLE EMISSIONS EVALUATOR

This is to certify that

*Hal Avery*

*met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.*

*Thomas Rose*  
\_\_\_\_\_  
President

*William J. ...*  
\_\_\_\_\_  
Vice President

*David B. Savage, Jr.*  
\_\_\_\_\_  
Program Manager

259390

Certificate Number

*Pensacola, Florida*

Location

*May 14, 1997*

Date of Issue

**PROFESSIONAL ENGINEER CERTIFICATION STATEMENT**

I, the undersigned, hereby certify, that the auxiliary boiler (Emission Unit No. 11) at the Sam O. Purdom Generating Station (Facility ID No. 1290001) has been constructed in substantial accordance with the information submitted in the corresponding application for air construction permit and with all provisions contained in Permit No. 1290001-002-AC and when properly maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection.



Karl Bauer, P.E. No. 45808  
Environmental Engineer

DECEMBER 12, 1997  
Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, SW  
ATLANTA, GEORGIA 30303-8909

DEC 01 1997

RECEIVED

DEC 12 1997

BUREAU OF  
AIR REGULATION

4APT-ARB

Mr. Martin Costello  
Air Resources Management Division  
Florida Department of Environmental  
Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJ: Comments Regarding Revisions to Monitoring Requirements  
in the Prevention of Significant Deterioration (PSD)  
Permit for Unit 8 at the City of Tallahassee Purdom  
Generating Station

Dear Mr. Costello:

This letter is in response to your October 23 request for comments regarding changes that your agency made in the draft PSD permit for the referenced unit. These changes were made in order to address concerns that an October 14, 1997, Region 4 letter raised regarding monitoring provisions in an earlier draft of the permit. After reviewing the October 23, 1997, draft permit, we have determined that our earlier concerns have been adequately resolved. Details regarding the issues addressed in our October 14 letter and their resolution are provided in this letter.

Alternative NO<sub>x</sub> Monitoring

One concern that we raised regarding the original draft permit for Purdom Unit 8 involved the excess emission monitoring method for NO<sub>x</sub>. The turbine in question is subject to 40 C.F.R. Part 60, Subpart GG (Standards of Performance for Stationary Gas Turbines), and Subpart GG requires that the amount of water injected to control NO<sub>x</sub> be monitored and used as an indicator of excess emissions. As an alternative to these procedures, the City of Tallahassee will be using a NO<sub>x</sub> continuous emission monitoring system (CEMS) to identify periods of excess emissions. The concern our previous letter expressed regarding this approach is that the original permit did not require that CEMS results be corrected to ISO standard day conditions (288 degrees Kelvin, 60 percent relative humidity, and 101.3 kilopascals) so that they could be directly compared to the format of the standard in Subpart GG.

In order to address our concerns regarding the reporting format for CEMS results, Condition F1 in the October 23, 1997, draft permit was revised to require that the City of Tallahassee correct results to ISO standard conditions upon request by the Florida Department of Environmental Protection (DEP). Since the NO<sub>x</sub> emission rates imposed under the PSD permit (12 ppm for operation on gas and 42 ppm for operation on oil, 30-day rolling average) are more stringent than the corresponding limit in Subpart GG (150 ppm, 1-hour average), we have concluded that this change adequately addresses our previous concerns regarding the reporting format specified for NO<sub>x</sub> CEMS results in the original draft permit. Because the PSD permit limits are more stringent than the Subpart GG limit, it is not necessary to convert the CEMS results to ISO standard conditions to verify compliance with the Subpart GG limit if compliance with the PSD limits is maintained. The revision incorporated in Condition F1 in the October 23, 1997, draft permit, however, will make it possible for the DEP to obtain the information necessary to determine compliance with Subpart GG limit in the event that the permit limits are ever exceeded.

#### Custom Fuel Monitoring Schedule

The other concern that we expressed regarding the original draft permit involved a proposed custom fuel monitoring schedule for determining the sulfur content of the natural gas burned in the turbine. On August 14, 1987, the U.S. Environmental Protection Agency (EPA) issued a policy regarding custom fuel monitoring schedules for determining the sulfur content of pipeline quality natural gas, and under this policy, companies can obtain approval to monitor the sulfur content of pipeline quality natural gas on a semiannual basis. In order to obtain this approval, the sulfur content of the gas must first be monitored twice a month for six months. If this monitoring verifies compliance and shows little variability in the sulfur content of the gas, the sulfur monitoring frequency can be reduced to a quarterly basis. If six quarters of monitoring data verify compliance and show little variability in the sulfur content of the gas, approval to monitor the sulfur content of the gas on a semiannual basis can be granted.

Our primary concern regarding the custom fuel monitoring schedule in the original draft permit was that it did not require conducting bi-monthly and quarterly monitoring as a prerequisite to approval of semiannual monitoring. Since the custom fuel monitoring schedule incorporated in the October 23, 1997, draft of the permit is identical to that outlined in the guidance issued by EPA in 1987, our previous concerns regarding the custom fuel monitoring provisions in the permit for Purdom Unit 8 have been adequately resolved.

If you have any comments regarding the determinations provided in this letter, please contact Mr. David McNeal of my staff at 404/562-9102.

Sincerely yours,

*David H. McNeal*  
*for*

Brian L. Beals  
Chief  
Preconstruction/HAP Section  
Air and Radiation Technology  
Branch

*cc: J. Curtis, C & T*