



Transmitted Via Certified Mail: 7011 0470 0001 0594 2519  
Most Livable City in America

August 23, 2012

Martin Costello, P.E.  
Division of Air Resources Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS 5500  
Tallahassee, Florida 32399-2400

**RECEIVED**  
AUG 23 2012  
DIVISION OF AIR  
RESOURCE MANAGEMENT

Re: Title V Air Operation Permit Renewal Application  
Request for Additional Information  
Sam O. Purdom Generating Station (Facility ID 1290001)

Dear Mr. Costello:

This letter is in response to your request dated June 19, 2012 for additional information concerning the Title V Air Operation Permit Renewal Application for the City of Tallahassee's Sam O. Purdom Generating Station. In particular, the Department requested three items of information. These items and the City's responses are listed below:

1. In letter dated May 16, 2012 regarding changes to the Title V permit for the Purdom facility, you requested changes to Specific Condition F.12 to clarify that all aspects of 40 CFR 60.332 apply to the NOx emission limit for Unit 8 and wanted the Title V permit to spell out the entire section from this NSPS rule, or use a permitting note about the NOx limit. The emission standard shown in this rule when firing fuel oil is approximately 75 ppmvd corrected for heat rate and fuel bound nitrogen, which is well above the BACT based limit in the permit of 42 ppmvd corrected only for fuel bound nitrogen. Although the NSPS limit is an applicable limit for Unit 8, it is much higher than the BACT limit. Are you requesting to revise the BACT NOx limit for Unit 8 to the NSPS limit for NOx when firing fuel oil? What specific parts of 60.332 do you want included in Specific Condition F.12?

**Response:** The City is not requesting a revision of the BACT NOx limit. Ultimately, the City of Tallahassee requests that the City be allowed to apply 60.332(a)(3) that states: *The use of F in paragraphs (a)(1) and (2) of this section is optional. That is, the owner or operator may choose to apply a NOx allowance for fuel-bound nitrogen and determine the appropriate F-value in accordance with paragraph (a)(4) of this section or may accept an F-value of zero.*

2. In letter dated May 16, 2012 you also requested clarification on testing requirements, especially prior to permit renewal. You stated that the frequency of compliance testing is not clear enough in current rules and that newer units have more specific indications of which route to take than older units. Rule 62-297.310(7)(a)3., F.A.C., requires the owner or operator to conduct a compliance test for those emissions units that are subject to an emissions limiting standard prior to obtaining a renewed operation permit (with some exceptions found in 62-210.300(2)(a)3b., c., or d., F.A.C. for units that have been shut down for at least 6 months, or the unit is on cold standby or long-term reserve shutdown). In order to determine if Unit 7 is part of the exceptions listed in Rule 62-210, please indicate whether this unit is on cold standby or long-term reserve shutdown, or whether it has operated in the past 6 months. The attachment for Unit 7's compliance demonstration was a letter concerning Emissions Unit 001. Was this letter for a VE test on Unit 7 (not Unit 1)? And if so please submit the actual VE test report. Information submitted

in the compliance plan indicated that Unit 7 may be tested on fuel oil as one of the compliance options although our understanding is that fuel oil lines have been removed from Unit 7. Is Unit 7 capable of being operated on fuel oil at this time? Are there plans to operate Unit 7 before its shut down date in 2013?

**Response:** According to Rule 62-210, Unit 7 would not be considered as a unit on cold standby or long-term reserve shutdown. The unit has operated in the last six months. Our previous attachment for the unit was for emissions unit 7, so please ignore the erroneous referral to the unit as Emissions unit 001. Please see the attached test report for visible emissions testing on unit 7 which was performed May 10, 2012, while the unit was combusting natural gas. Oil fuel lines have been removed from Unit 7 and it would take quite a bit of effort to reinstall those fuel lines in order to operate the unit on oil. There are no plans to run unit 7 on oil. The City does plan to operate the unit before the shutdown date of December 31, 2013. Additionally, the City does not plan to perform compliance testing for sulfur dioxide emissions, as the compliance demonstration is the monitoring of fuel sulfur content. If this is erroneous please contact the City at your earliest convenience.

3. Please submit a compliance demonstration within the past 5 years from the auxiliary boiler for VE.

**Response:** No testing has been performed on the auxiliary boiler in the past few years, however the compliance plan addresses testing for visible emissions. The City has provided notice to the compliance authority that visible emissions testing on the auxiliary boiler is scheduled for September 18, 2012. A test report will be provided to the compliance authority and the permitting agency within 45 days of completion.

Please note that the attached compliance plan has been changed to reflect a new completion date. Instead of September 1<sup>st</sup>, all testing has been scheduled to be complete by September 30<sup>th</sup>. This new date was required due to a small fire on Unit 8 which required the unit to be offline for two months which in turn impacted the ability of the plant to dispatch electric generating units. The scheduled testing for compliance demonstrations is as follows:

Emissions Unit	Compliance Test	Date Scheduled	Test Completed and Report Sent
Unit 7 (EU 007)	VE	May 10	Yes – May 17
Unit 8 (EU 014)	VE	August 7	Yes – August 23
CT1 (EU 008)	VE	September 18	No
CT2 (EU 009)	VE	September 18	No
Aux Boiler (EU 011)	VE	September 18	No

If you have any questions regarding the information above, please do not hesitate to contact me at (850) 891-8710, or John Powell, Environmental Regulatory Compliance Administrator at (850) 891-8851 or Triveni Singh, Manager of Power Production at (850) 891-5532.

Sincerely,



Russell Wider, P.E.  
Environmental Engineer

Attachment

cc: Cynthia Barber, COT  
Dave Mordecai, COT  
Triveni Singh, COT

Karl Bauer, COT  
John Powell, COT

## Compliance Plan

The City of Tallahassee presents the following compliance plan to bring the facility into compliance with the terms and conditions of permit no. 1290001-010-AV. Rule 62-297.310(7), F.A.C. requires that any emissions unit that is subject to any emissions limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. However, it has always been the stance of the department that it was reluctant to require the testing of emissions units using fuels that the unit has not been firing, simply for the sake of emissions testing. The City has not fired oil for 400 hours on a number of units at the facility. In fact, Unit 7's fuel oil lines were disconnected a number of years ago.

The City recognizes the need for the facility to be in-compliance prior to permit renewal issuance and the need to complete compliance testing as outlined by permit no. 1290001-010-AV. The City presents this compliance plan to bring the facility into 'compliance'.

### CT1, CT2, & Aux. Boiler:

Combustion Turbines CT1 and CT2 and the auxiliary boiler are required to test for visible emissions (VE) once every five years. As of yet, this testing has not been performed. The City will perform these tests while the units are combusting natural gas, during the summer of 2012, as these units are typically dispatched during the summer season. As such we propose the following schedule:

Activity	Due Date
Notifications of VE Tests to FDEP for units CT1, CT2 and auxiliary boiler	15 days prior to compliance test
VE test Completed	No later than 9/30/12
Compliance test report to FDEP	45 days after compliance test is completed

### Unit 7:

Unit 7 has an emissions limit for SO<sub>2</sub> of 1.87 lbs/MMBtu heat input. The compliance method is a fuel sampling program, in lieu of annual testing. If testing for SO<sub>2</sub> is required prior to permit renewal, said test will be completed summer of 2012.

Activity	Due Date
Notification of SO <sub>2</sub> Test to FDEP for unit 7	15 days prior to compliance test
SO <sub>2</sub> test Completed	No later than 9/30/12
Compliance test report to FDEP	45 days after compliance test is completed

### Unit 8:

Unit 8 is tested annually for NO<sub>x</sub> and CO. Test results from last year have been provided in the permit application. VE testing has not been performed in the prior year and as such, VE testing will be performed the summer of 2012, while the unit is firing natural gas.

Activity	Due Date
Notification of VE Test to FDEP for unit 8	15 days prior to compliance test
VE test Completed	No later than 9/30/12
Compliance test report to FDEP	45 days after compliance test is completed

This unit has dual emissions standards, as it is capable of firing oil. Compliance testing while firing oil has not been performed on this unit because it did not trigger the required 400 hours of operation on that fuel type. The City proposes two options for demonstrating compliance with the applicable emissions limiting standard.

**Option 1:**

This unit is equipped with continuous emissions monitoring equipment that is certified as required to the specifications of 40 Code of Federal Regulations Part 75. As required, the CEMS is certified annually, while using its primary fuel, natural gas. The City proposes that in lieu of performing stack tests to demonstrate compliance with the emissions limiting standards for oil use, that CEMS data be submitted to demonstrate compliance, when the unit uses oil as fuel. Continuous emissions monitors can provide more reliable data than stack testing, and it would be readily available without incurring additional cost.

**Option 2:**

In lieu of using a more costly and more polluting fuel in the very near future, that upon triggering a set number of hours of operation on fuel oil, the facility will conduct compliance tests for all corresponding pollutants within 90 days. The City proposes that upon reaching 250 hours of oil use, the City will conduct compliance testing for VE, NOx, and CO for all three units. The following schedule is proposed if the Department requires compliance testing:

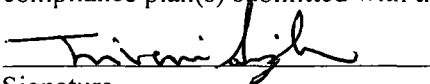
Upon 250 hours of oil use:

<b>Activity</b>	<b><i>Due Date</i></b>
Notification to the Department of 250 hours of oil use and the trigger to conduct oil firing for the purposes of demonstrating compliance with permit renewal testing	
Notifications of VE, NOx, and CO tests on Unit 8 while firing oil	15 days prior to test
Tests (VE, CO, NOx) Completed	No later than 90 days after triggering 250 hrs
Compliance test reports to FDEP	No later than 45 days after compliance test is completed

## APPLICATION INFORMATION

### Application Responsible Official Certification

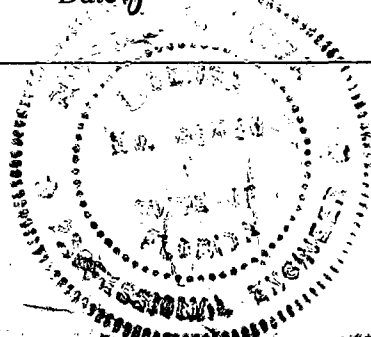
Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:	<b>Triveni Singh, Manager Power Production</b>
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):	<input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input checked="" type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address...	Organization/Firm: <b>City of Tallahassee</b> Street Address: <b>2602 Jackson Bluff Road</b> City: <b>Tallahassee</b> State: <b>FL</b> Zip Code: <b>32304</b>
4. Application Responsible Official Telephone Numbers...	Telephone: <b>(850) 891 - 5533</b> ext. Fax: <b>(850) 891 - 5162</b>
5. Application Responsible Official E-mail Address:	<b>Triveni.Singh@talgov.com</b>
6. Application Responsible Official Certification:	<p>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</p> <p> Signature</p> <p><u>8/21/12</u> Date</p>

**Professional Engineer Certification**

1. Professional Engineer Name: <b>Russell A. Wider, Environmental Engineer</b> Registration Number: <b>66540</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>City of Tallahassee</b> Street Address: <b>300 South Adams Street</b> City: <b>Tallahassee</b> State: <b>Florida</b> Zip Code: <b>32304</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(850) 891-8710</b> ext. Fax: <b>(850) 891-8277</b>
4. Professional Engineer E-mail Address:
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and 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; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  <u>Russell A. Wider</u> Signature  (seal)  August 23, 2012 Date

\* Attach any exception to certification statement.



Transmittal via email: [NWDAir@dep.state.fl.us](mailto:NWDAir@dep.state.fl.us)

May 17, 2012

Florida Department of Environmental Protection  
Northwest District Office  
160 Governmental Center  
Pensacola, Florida 32502-5794

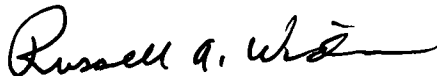
Re: Visible Emissions Test  
Boiler Unit 7 (EU-007)  
City of Tallahassee  
Sam O. Purdom Generating Station (Facility ID: 1290001)

Dear Mr. Bradburn:

Pursuant to the City of Tallahassee's letter dated April 26<sup>th</sup>, the City submits the attached visible emissions test for the Sam O. Purdom Generating Station. The visible emissions test was conducted on May 10, 2012, in order to demonstrate compliance with the permitted limit of 20%, six-minute average for opacity. The test was conducted while the unit was firing natural gas as fuel. The test results demonstrate a visible emissions determination of 0% opacity, based on a 6-minute average.

Please do not hesitate to contact me at (850) 891-8710, or John Powell, Environmental Regulatory Compliance Administrator at (850) 891-8851, if you have any questions or require additional information.

Sincerely,



Russell Wider, P.E.

Attachment

cc: Cynthia Barber, COT  
Dave Mordecai, COT  
John Powell, COT  
Karl Bauer, COT



# VISIBLE EMISSION OBSERVATION FORM 1

Method (List, 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  
**FLORIDA**    Zip  
**32355**

Process  
**BOILER - GAS FIRED**    Unit #  
**7**    Operating Mode  
**559 mm btu**  
 Control Equipment  
**NONE**    Operating Mode  
**NIA**

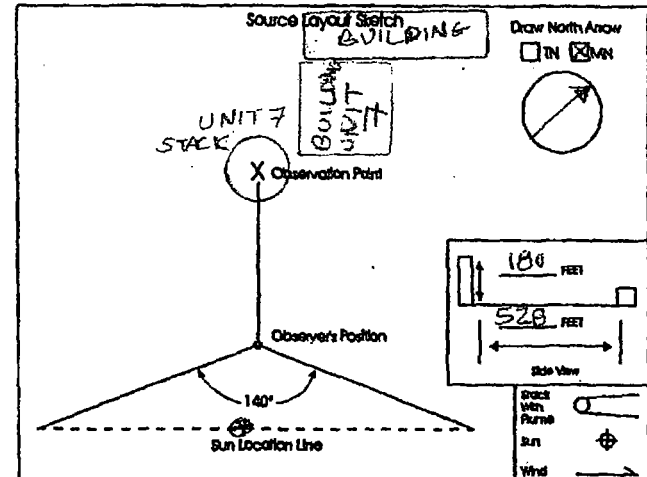
Describe Emission Point  
**ROUND CONCRETE STACK WEST OF UNIT 7 BUILDING**

Height of Emiss. Pt.  
 Start **180'**    End **180'**    Height of Emiss. Pt. Rel. to Observer  
 Start **185'**    End **185'**  
 Distance to Emiss. Pt.  
 Start **528'**    End **528'**    Direction to Emiss. Pt. (Degree)  
 Start **290°**    End **290°**

Vertical Angle to Obs. Pt.  
 Start **18°**    End **18°**    Direction to Obs. Pt. (Degree)  
 Start **290°**    End **290°**  
 Distance and Direction to Observation Point from Emission Point  
 Start **1' above stack**    End **SAME**

Describe Emissions  
 Start **CONING**    End **CONING**  
 Emission Color  
 Start **CLEAR**    End **CLEAR**    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 **3-5 mph**    End **SAME**    Wind Direction  
 Start **NW**    End **SAME**  
 Ambient Temp.  
 Start **84°**    End **85°**    Wet Bulb Temp.  
 Start **65°**    RH Percent  
**29**



Longitude  
**84° 12' 00.1"**    Latitude  
**30° 09' 46.2"N**    Declination  
**-3**

Additional Information  
**PERMIT# 1290001-010-AV**

Form Number **PUN 07** Page **1** of **2**  
 Continued on VEO Form Number \_\_\_\_\_

Observation Date		Time Zone				Start Time	End Time
5-10-2012		EST				1:40 PM	2:40 PM
Sec	0	15	30	45	Comments		
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			

Observer's Name (Print)  
**HAZEM TAMIMI**  
 Observer's Signature  
*Hazem Tamimi*    Date  
**5-10-2012**  
 Organization  
**CITY OF TALLAHASSEE**  
 Certified by  
**WHITLOW**    Date  
**2-22-2012**

# VISIBLE EMISSION OBSERVATION FORM 1

Form Number **PUN 07** Page **2** of **2**  
 Continued on VEO Form Number

Method (Check One)  
 Method 1 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 **FLORIDA** Zip **32355**

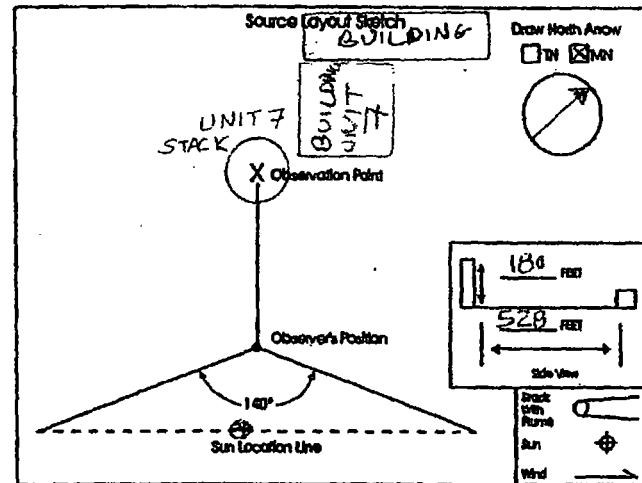
Process **BOILER - GAS FIRED** Unit # **7** Operating Mode **559 mm btu**  
 Control Equipment **NONE** Operating Mode **N/A**

Describe Emission Point  
**ROUND CONCRETE STACK WEST OF UNIT 7 BUILDING**  
 Height of Emis. Pt. Start **180'** End **180'** Height of Emis. Pt. Dist. to Observer Start **185'** End **185'**  
 Distance to Emis. Pt. Start **528'** End **528'** Direction to Emis. Pt. (Degrees) Start **290°** End **290°**

Vertical Angle to Obs. Pt. Start **18°** End **18°** Direction to Obs. Pt. (Degrees) Start **290°** End **290°**  
 Distance and Direction to Observation Point from Emission Point Start **1' above stack** End **SAME**

Describe Emissions  
 Start **CONING** End **CONING**  
 Emission Color Start **CLEAR** End **CLEAR** 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 **3-5 mph** End **SAME** Wind Direction Start **NW** End **SAME**  
 Ambient Temp. Start **84°** End **85°** Wet Bulb Temp. **65°** RH Percent **29**



Longitude **84° 12' 00.1"** Latitude **30° 09' 46.2" N** Direction **-3**

Additional Information  
**PERMIT# 1290001-010-AV**

Min	Sec	0	15	30	45	Comments
1	0	0	0	0	0	
2	0	0	0	0	0	
3	0	0	0	0	0	
4	0	0	0	0	0	
5	0	0	0	0	0	
6	0	0	0	0	0	
7	0	0	0	0	0	
8	0	0	0	0	0	
9	0	0	0	0	0	
10	0	0	0	0	0	
11	0	0	0	0	0	
12	0	0	0	0	0	
13	0	0	0	0	0	
14	0	0	0	0	0	
15	0	0	0	0	0	
16	0	0	0	0	0	
17	0	0	0	0	0	
18	0	0	0	0	0	
19	0	0	0	0	0	
20	0	0	0	0	0	
21	0	0	0	0	0	
22	0	0	0	0	0	
23	0	0	0	0	0	
24	0	0	0	0	0	
25	0	0	0	0	0	
26	0	0	0	0	0	
27	0	0	0	0	0	
28	0	0	0	0	0	
29	0	0	0	0	0	
30	0	0	0	0	0	

Observer's Name (Print)  
**HAZEM TAMIMI**  
 Observer's Signature *Hazem Tamimi* Date **5-10-2012**

Organization  
**CITY OF TALLAHASSEE**  
 Certified by **WHITLOW** Date **2-22-2012**



**Whitlow Enterprises, LLC**

[www.smokeschool.net](http://www.smokeschool.net)

**Certifies that**

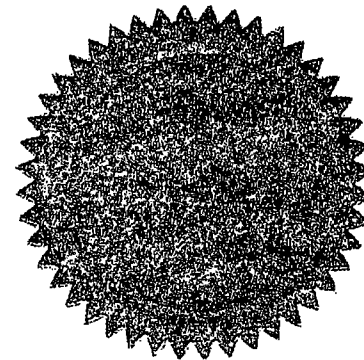
**Hazem Tamimi of City of Tallahassee**

**Has passed the certification test required by EPA Method 9  
40 CFR 60 Appendix A and is qualified as a visible emissions evaluator.**

**Certification Date: 2/22/2012 Location: Gainesville, FL**

**George Whitlow**

**President**



GFL022212-16



Most Livable City in America  
Submitted via email: [NWDair@dep.state.fl.us](mailto:NWDair@dep.state.fl.us)

August 23, 2012

Rick Bradburn  
Northwest District Office  
Florida Department of Environmental Protection  
160 Governmental Center  
Pensacola, Florida 32502-5794

Re: 2012 Annual Compliance Test  
Unit PP8 (EUs - 014)  
Visible Emissions  
Sam O. Purdom Generating Station - Facility ID No. 1290001

Dear Mr. Bradburn:

Pursuant to Title V Air Operation Permit No. 1290001-010-AV, the City of Tallahassee (City) submits the attached annual air compliance test report for visible emissions (VE) for combined cycle combustion turbine PP8(EU-014) at the Sam O. Purdom Generating Station. The tests were performed during the week of August 7, 2012 while the unit was firing natural gas.


The test results indicate that the measured emissions average for the pollutants, corrected to 15% O<sub>2</sub>, were the following:

Emission Unit	VE 6 minute average	VE permit limit	Heat Input (mmBtu/hr)
PP8 (EU-014)	0%	10%	1506

Attached are the field data sheets from the visible emissions testing that were conducted in accordance with Reference Method 9. The Visible Emissions test was performed on Unit PP8 at a heat input of 1506 mmBtu/hr LHV which corresponds to 93% of maximum permitted capacity. A separate compliance test report for CO, which was conducted the same day will sent shortly by mail.

Please do not hesitate to contact me at (850) 891-8710, if you have any questions or require additional information.

Sincerely,

  
Russell Wider, P.E.  
Environmental Engineer

Attachments

cc: Cynthia Barber, COT  
Triveni Singh, COT  
Karl Bauer, COT

CITY HALL  
300 South Adams Street  
Tallahassee, FL 32301-1731  
850-891-0000  
TDD: 711 • Talgov.com

JOHN R. MARKS, III  
Mayor  
ANITA F. THOMPSON  
City Manager

ANDREW GILLUM  
Commissioner  
JAMES R. ENGLISH  
City Attorney

NANCY MILLER  
Commissioner  
JAMES O. COOKE, IV  
City Treasurer-Clerk

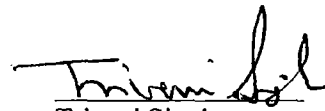
MARK MUSTIAN  
Commissioner  
SAM M. McCALL  
City Auditor

GIL D. ZIFFER  
Commissioner

John Powell, COT  
Dave Mordecai, COT

### Responsible Official Certification

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 document is being submitted. I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements and information in this document are true, accurate, and complete.

A handwritten signature in black ink, appearing to read "Triveni Singh", written over a horizontal line.

Triveni Singh  
Responsible Official

# EPA VISIBLE EMISSION OBSERVATION FORM 1

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

Form Number **PP801** Page **1** of **2**  
 Continued on VEO Form Number **PP802**

Company Name **City of Tallahassee**  
 Facility Name **Sam O Purdum Generating Station**  
 Street Address **667 Port Leon Drive**  
 City **St. Marks** State **FL** Zip **32355**

Process **Combined Cycle CT** Unit # **PP8** Operating Mode **1506 mMBtu/hr**  
 Control Equipment **Dry Low NOx burners** Operating Mode \_\_\_\_\_

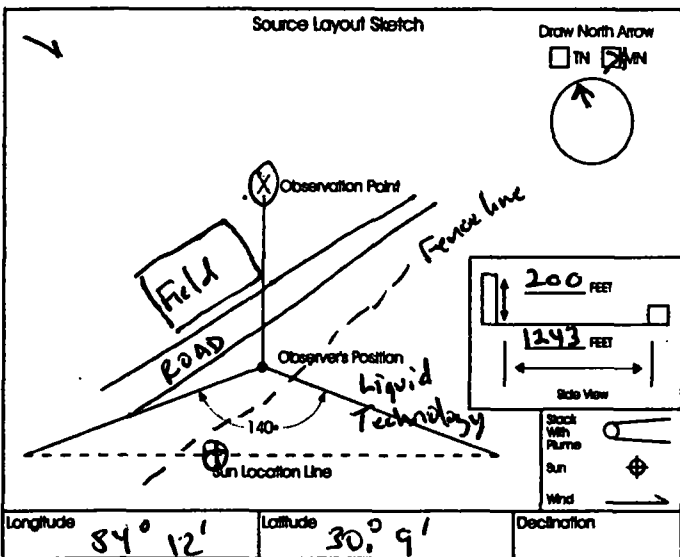
Describe Emission Point  
**Gray Stack southernmost**

Height of Emiss. Pt. Start **200 ft** End **200 ft** Height of Emiss. Pt. Rel. to Observer Start **200 ft** End **200 ft**  
 Distance to Emiss. Pt. Start **1243 ft** End **1243 ft** Direction to Emiss. Pt. (Degrees) Start **36°** End **36°**

Vertical Angle to Obs. Pt. Start **9°** End \_\_\_\_\_ Direction to Obs. Pt. (Degrees) Start **36°** End **36°**  
 Distance and Direction to Observation Point from Emission Point Start **1 m above** End **SAME**

Describe Emissions Start **Clear** End **SAME**  
 Emission Color Start **Clear** End \_\_\_\_\_ Water Droplet Plume Attached  Detached  None

Describe Plume Background Start **Clouds + Gray Sky** End **SAME**  
 Background Color Start **Gray** End **SAME** Sky Conditions Start **Overcast** End **SAME**  
 Wind Speed Start **1 to 2** End **SAME** Wind Direction Start **SE** End **SAME**  
 Ambient Temp. Start **80°F** End **84°F** Wet Bulb Temp. **77°F** RH Percent **86%**



Observation Date	Time Zone	Start Time	End Time						
<b>8/7/12</b>	<b>EDST</b>	<b>3:27 pm</b>	<b>4:27 pm</b>	Sec	0	15	30	45	Comments
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					

Observer's Name (Print) **Russell A. Wider**  
 Observer's Signature **Russell A. Wider** Date **8/7/12**  
 Organization **City of Tallahassee**  
 Certified By **EPA** Date **5/16/12**

# EPA VISIBLE EMISSION OBSERVATION FORM 1

Form Number **PP802** Page **2<sup>nd</sup>**  
 Continued on VEO Form Number **PP801**

Method 9 (Method 9) 203A 203B Other: \_\_\_\_\_

Company Name **City of Tallahassee**  
 Facility Name **SAM O. Purdom**  
 Street Address **667 Port Leon Drive**  
 City **St. Marks** State **FL** Zip **32355**

Process **Combined Cycle CT** Unit # **PP8** Operating Mode **1506mmBt/h**  
 Control Equipment \_\_\_\_\_ Operating Mode \_\_\_\_\_

Describe Emission Point

Height of Emiss. Pt. Start _____ End _____	Height of Emiss. Pt. Rel. to Observer Start _____ End _____
Distance to Emiss. Pt. Start _____ End _____	Direction to Emiss. Pt. (Degrees) Start _____ End _____

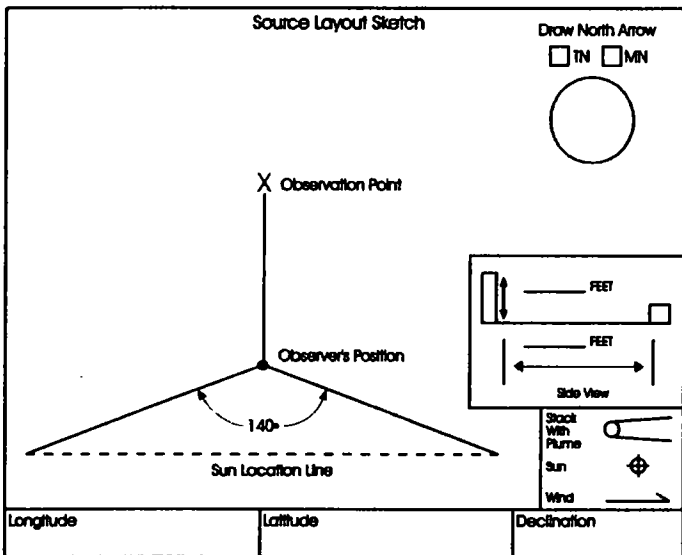
Vertical Angle to Obs. Pt. Start _____ End _____	Direction to Obs. Pt. (Degrees) Start _____ End _____
Distance and Direction to Observation Point from Emission Point Start _____ End _____	

Describe Emissions

Start _____ End _____	Water Droplet Plume
Emission Color Start _____ End _____	Attached <input type="checkbox"/> Detached <input type="checkbox"/> None <input type="checkbox"/>

Describe Plume Background

Start _____ End _____	Background Color Start _____ End _____	Sky Conditions Start _____ End _____
Wind Speed Start _____ End _____	Wind Direction Start _____ End _____	
Ambient Temp. Start _____ End _____	Wet Bulb Temp. Start _____ End _____	RH Percent _____



Additional Information

Min	Sec				Comments
	0	15	30	45	
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	

Observer's Name (Print) **Russell A. Uider**  
 Observer's Signature **Russell A. Uider** Date **8/7/12**  
 Organization **City of Tallahassee**  
 Certified By **CTA** Date **5/16/12**





# VISIBLE EMISSIONS EVALUATOR

**Russell Wider**

This is to certify that the above named observer has met the specifications of Federal Reference Method 9 and is 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, Inc. of Raleigh, N.C.

This certificate is valid for six months from date of issue.

**404704**

Certificate Number

**WID360837**

Student ID Number

**5/16/2012**

Date of Certification

**Pensacola, FL**

Location

**11/15/2012**

Certification Expiration Date

**TMPF11**

Last Lecture

*Marty Hughes*  
Director of Training