



February 27, 2004

Certified Mail No.: 70010360000207627823

Gerald Neubauer
Northwest District Branch Office
Florida Department of Environmental Protection
2815 Remington Green Circle, Suite A
Tallahassee, Florida 32308-1513

RECEIVED

MAR 02 2004

BUREAU OF AIR REGULATION

Re: Combined Cycle Combustion Turbine Unit No. 8
EU ID No. -014
Sam O. Purdom Generation Station
Title V Air Operation Permit No. 1290001-007-AV

Dear Mr. Neubauer:

It was a pleasure speaking with you on February 25th and 27th, 2004, regarding the Sam O. Purdom Generating Station. As we discussed, Unit No. 8, a 250-megawatt class combined-cycle unit, at the Purdom Generating Station suffered a malfunction on February 14, 2004, resulting in severe damage to the steam turbine. As requested, the purpose of this letter is to memorialize our conversations and to provide the Florida Department of Environmental Protection (FDEP) with additional information regarding the nature of the damage and repair efforts.

Brief Description of Malfunction and Repair Efforts

Shortly after midnight on the morning of Saturday, February 14, 2004, Unit 8 experienced a malfunction on the steam turbine which resulted in extensive damage. The mechanical and electrical damage caused by the malfunction was isolated to the steam turbine generator and the condenser. There was no damage to the combustion turbine generator. The cause of the malfunction is currently unknown and a forensic engineering investigation has been initiated. There is no indication that the malfunction resulted in the release of any excess air emissions or violations of the above referenced Title V Air Operation Permit. Unit 8 is currently inoperable and off-line.

The current estimated cost of the repairs is five million dollars, which is less than five percent of the current replacement value of Unit 8. While this cost may increase as the final damage assessment and repair scope is completed, it is not anticipated to exceed six to eight percent of the current replacement value of Unit 8.

Recovery efforts were commenced immediately following the malfunction. These recovery efforts include the disassembly of the steam turbine generator, assessment of the condenser damage and development of a recovery work scope and plan. As the assessment continues, replacement parts are being ordered and repair efforts are underway. The total time for repairs is currently estimated at six to eight weeks.

Since Unit 8 is a relatively new electric generating unit and completed its first year of commercial operation just a few years ago, most of the necessary replacement parts currently available are identical to the original Unit 8 components. In the event that identical parts are not available, functionally equivalent parts will be used.

Effect on Emissions

Unit 8 is a standard one-on-one combined cycle unit with no supplemental firing in the heat recovery steam generator. This results in the emissions being generated solely from the combustion of fuel in the combustion turbine portion of the unit. The malfunction and damages outlined above did not affect the combustion turbine. Since there was no damage to the combustion turbine, there are no impacts on the Unit 8 air emissions as a result of this malfunction and the subsequent repairs.

Agency Notification

Pursuant to the various rules and permit conditions regulating the Purdom Generating Station, the following notifications were provided:

The Florida State Warning Point was immediately notified via telephone at approximately 5:45am on the morning of the subject malfunction. The State Warning Point in-turn notified Mr. Jerry Weinrich with the FDEP.

Written notification was sent to the attention of Mr. Gerald Neubauer at the Northwest District Branch Office in Tallahassee via certified mail on February 18, 2004, (*received on February 19, 2004*) and copied to Mr. Hamilton S. Oven and Mr. William Armstrong also with the FDEP.

Separate written notification was sent via certified mail on February 19, 2004, to FDEP Northwest District Director Ms. Mary Jean Yon, and copied to Mr. William Armstrong also with the FDEP.

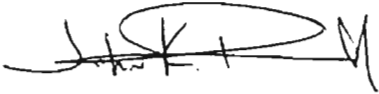
Mr. Mike Halpin with the FDEP Division of Air Resources Management Bureau of Air Regulation was notified via telephone on February 25, 2004, of the malfunction and the repair efforts.

Follow-Up Requirements

As directed, the City of Tallahassee will promptly notify the FDEP of the cause of the malfunction once the forensic investigation is complete. In addition, the FDEP will be notified of the anticipated start-up date as soon as it becomes available.

Thank you again for your attention to this matter. Please do not hesitate to contact me at (850) 891-8851, or Jennette Curtis, Environmental Services Administrator at (850) 891-8850, if you need additional information or if anything further is required of the City of Tallahassee.

Sincerely,


A handwritten signature in black ink, appearing to read 'J.K. Powell', with a large, stylized flourish at the end.

John K. Powell, P.E.

cc: Jim Pennington, FDEP
Mary Jean Yon, FDEP
Sandra Veazey, FDEP
Mike Halpin, FDEP
Cynthia Barber, COT
Kevin Wailes, COT
Rob McGarrah, COT
Gordon King, COT
Jennette Curtis, 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 information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate and complete.



Robert E. McGarrah
Responsible Official


P.E. Certification Statement

I, the undersigned, hereby certify, based on information and belief formed after reasonable inquiry that the statements made and the information contained in this document are true, accurate and complete. I further certify that, to the best of my knowledge, the engineering features in this document provide reasonable assurance of compliance with the applicable provisions of Chapter 62-213, Florida Administrative Code. However, I do not certify aspects of the proposal outside my area of expertise (including but not limited to electrical, mechanical, or structural features).



John K. Powell
Professional Engineer No. 58737
City of Tallahassee

2/27/04
Date


2/27/04

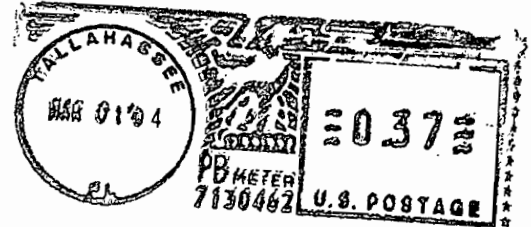
(seal)

City of Tallahassee
Your Own Utilities™



300 South Adams Street
Tallahassee, FL 32301

Mike Halpin
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road MS 5500
MC 5515
Tallahassee, Florida 32399-2400



32399+2400 01

