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Governor

Department of Environmental Protection

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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

May 25, 2004

- CERTIFIED MAIL - RETURN RECEIPT REQUESTED -

Mr. Robert E. McGarrah
Manager Power Production
City of Tallahassee
2602 Jackson Bluff Road
Tallahassee, Florida 32304

**RE: Arvah B. Hopkins Generating Station Unit 2, PA 74-03I
OGC No. 04-0643**

ORDER MODIFYING CONDITIONS OF CERTIFICATION

Dear Mr. McGarrah:

The Florida Pollution Control Board issued the Site Certification for Arvah B. Hopkins Generating Station Unit 2 on May 20, 1975. This certification authorized the construction and operation of a 238 megawatt (MW) steam electric power plant and ancillary facilities. The Department of Environmental Protection has subsequently modified the Conditions of Certification on eight different occasions by final orders.

On April 16, 2004, the City of Tallahassee submitted a petition to the Department requesting a modification to the site certification for the Hopkins Generating Station Unit 2 to authorize the operation of twenty-three (23) small (nominal 5.5 MW each) natural gas-fired, simple cycle combustion turbines on a temporary and limited basis.

On or before April 23, 2004, all parties to the certification proceeding were provided with notice by certified mail of the Department's intent to modify the Conditions of Certification for this facility, along with a copy of the proposed Order Modifying Conditions of Certification. Additionally, on April 23, 2004, notice of the Department's intent to modify the Conditions of Certification for this facility was published on the Department's website. Those notices specified that pursuant to Section 403.516, F.S., and Rule 62-17.211, F.A.C., all parties to the certification proceeding have 45 days from the issuance of the notice by mail to such party's last address of record in which file a written objection to the modification; that failure of any of the parties to file a response will constitute a waiver of objection to the modification; and that any person who is not already a party to the certification proceeding and whose substantial interests will be affected by the requested modification has 30 days from the date of publication of the public notice in the Florida Administrative Weekly to object in writing.

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No objections to the modification have been received by the Department. The Conditions of Certification for the Arvah B. Hopkins Generating Station Unit 2 are hereby modified as follows:

Special Condition

1. H. Emission Units 08 – 030

The following Specific Conditions apply to the turbine-generator sets:

PERFORMANCE RESTRICTIONS

1. Licensee is authorized to temporarily site, tune, and operate twenty three turbine-generator sets, each with nominal generating capacity of 5.5 megawatts, at the Arvah B. Hopkins Generation Station. The semi-trailer mounted generators are designed to produce a nominal 126.5 MW of electrical power. Operation of these emission units will cease after September 30, 2004. [Applicant Request]

2. The combined hours of operation for the turbine-generator sets shall not exceed 11,500 hours. This restriction is based on the Licensee's request, which formed the basis of the PSD non-applicability determination and resulted in the emission standards specified in this permit. For any request to modify this emission unit (whether a physical or operational modification, including an increase in the allowable hours of operation or heat input), the Licensee shall, if required under the Department's rules, submit a request for permit revision. [Rules 62-212.400(2)(g) and 62-212.400(6)(b), F.A.C.]

3. Allowable Fuel: The turbine-generator sets shall be fired only with natural gas. The Licensee shall demonstrate compliance with the limitation on operating hours by keeping the records specified in this permit. [Applicant Request, Rule 62-210.200, F.A.C. (Definition - PTE)]

EMISSION STANDARDS

4. Nitrogen Oxides (NO_x): NO_x emissions from each turbine-generator set shall not exceed 25 ppmvd@15% O₂. [Rule 62-212.400, F.A.C. (PSD avoidance)]

5. 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% opacity). The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)1, F.A.C.]

EXCESS EMISSIONS

6. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) 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.]

7. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction, shall be prohibited. [Rule 62-210.700(4), F.A.C.]

OPERATIONAL LIMITATIONS

8. Permitted Capacity: The heat input to each turbine-generator set shall not exceed 63.07 MMBtu per hour on a lower heating value basis at ISO conditions. This information is being provided to identify the capacity of each unit for the purpose of confirming that emissions testing is conducted within 90 to 100 percent of each unit's rated capacity. Regular recordkeeping is not required for heat input. The owner or operator is expected to determine heat input when emissions testing is required, to demonstrate what percentage of the rated capacity that the unit was tested. [Rules 62-4.160(2), 62-210.200(PTE), and construction permit application]

9. Hours of Operation: The total operating hours for all twenty three turbine-generator sets shall not exceed 11,500 hours combined. [Rule 62-210.200, F.A.C. (Definitions - PTE)]

EMISSIONS PERFORMANCE TESTING

10. Performance Test Methods: Compliance tests shall be performed in accordance with the following reference methods as described in 40 CFR 60, Appendix A, and adopted by reference in Chapter 62-204.800, F.A.C.

(a) EPA Method 20, 7 or 7E – Determination of Nitrogen Oxide Emissions from Stationary Sources (I);

(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. [Rule 62-297.310(4)(a)1., F.A.C.]

2. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur. [Rule 62-297.310(4)(a)2., F.A.C.]

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet. [Rule 62-297.310(4)(b), F.A.C.]

(c) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C. [Rule 62-297.310(4)(d), F.A.C.]

16. 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. [Rule 62-297.310(5)(a), F.A.C.]

(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)(b), F.A.C.]

17. 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 as it deems necessary in order to identify the nature and quantity of pollutant emissions from the emissions unit(s) and the owner or operator shall provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

18. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2., F.A.C.]

19. Emissions Performance Test Reports: A report indicating the results of any required emissions performance test shall be submitted to the Compliance Authority no later than 45 days after completion of the last test run. The test report shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. [Rule 62-297.310(8), F.A.C.]

20. The Licensee shall record the total operating hours of the turbine-generator sets. The information shall be recorded in a written or electronic log and shall be available for inspection from the Compliance Authority. [Rule 62-4.160(15), F.A.C.]

21. Annual Operating Report: The Licensee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62.210.370(2), F.A.C.]

22. NSPS, Subpart GG: The Licensee shall maintain the records of fuel nitrogen and sulfur content specified in 40 CFR 60, Subpart GG [62-204.800(8)(b)39., F.A.C.]

Any party to this Order has a right to seek judicial review of it pursuant to Section 120.68, Florida Statutes by filing a Notice of Appeal, pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department of Environmental Protection in the

Office of General Counsel, 3900 Commonwealth Boulevard, M.S. 35, Tallahassee, Florida 32399-3000, and by filing a copy of the Notice of Appeal, accompanied by the applicable filing fees, with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty days from the date this Order is filed with the Clerk of the Department of Environmental Protection.

Executed in Tallahassee, Florida.

Hamilton S. Oven

Hamilton S. Oven, P.E.
Administrator
Siting Coordination Office

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52
Florida Statutes, with the designated
Department Clerk, receipt of which is
hereby acknowledged.

Debbie Cobb 5/25/04
Clerk Date

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