

Via Hand Delivery

February 13, 2009

Michael Halpin, Administrator
Siting Coordination Office
Florida Department of Environmental Protection
Mail Station 48
3900 Commonwealth Blvd.
Tallahassee, FL 32399

RE: Sam O. Purdom Generating Station, Unit No. 8, No. PA-97-36
Postcertification Amendment to Site Certification Application
Fuel Oil Tank Conversion and Guard Shack Installation

Dear Mr. Halpin:

The City of Tallahassee's (City) Sam O. Purdom Generating Station (Purdom) is currently covered by Site Certification No. PA-97-36B. Pursuant to Rule 62-17.205(1), F.A.C., the City is requesting a Post Certification Amendment to the Site Certification for the following two items.

Oil Tank Conversion: Currently the City has two fuel oil storage tanks, No. 1 (FDEP Tank 10) (20,000 bbl) and No. 3 (FDEP Tank 12) (80,000 bbl) that store No. 6 (Bunker "C") fuel oil. With the recent conversion of Hopkins Unit 2 to a combined cycle generating unit, the City's need for #6 fuel oil has decreased and the need for #2 fuel oil has increased. As a result, the City desires to utilize these two above ground storage tanks to store clean low sulfur No. 2 (diesel) fuel oil. These tanks, and associated piping, will comply with the applicable FDEP above ground fuel oil storage tank rules (FAC 67-762). The specific steps include:

- Removal of the No. 6 fuel oil and cleaning of the tanks
- Installation of internal secondary containment
- Installation of a TRAPS System as an Alternative Dike Field Secondary Containment System. This alternative dike field secondary containment system has been approved by the FDEP Storage Tank Regulations Section (See attached). While installation of the TRAPS System, will result in a small increase in impervious surface area within the existing fuel oil storage tank diked area, this will not impact any storm water treatment or discharge provisions in the Site Certification since it is within an already permitted diked area.¹

Based on discussions with FDEP's Division of Air Resources Management and consistent with Rule 62-210.300(3)(b)1, F.A.C, there is no air construction permit required for the tank work

¹ The Site Certification provides for treatment and controlled release of the storm water within the existing diked storage area.

because the potential volatile organic compound emissions from both tanks combined are below five tons per year.

Guard Shack: The City desires to add a guard shack at the main plant entrance. This guard shack will be approximately 8' x 20' and will be located on the existing plant entrance road within the plant boundaries. The guard shack will be a pre-manufactured building. No additional impervious surface area will be added as a result of the addition of this guard shack. No changes will be made to, or within the right of way for, the connection with State Road 363. This City plans on providing potable water and sewer (from City of St. Marks through the existing plant connections), electrical feed (from the plant station service) and phone/internet connections (via existing plant connections). The utilities will be primarily located below ground.

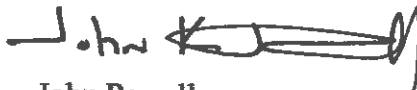
We have attached revised site plans that depict the proposed guardhouse.

Because these changes at the facility will not result in any significant adverse impacts or change in conditions of certification, we believe a Post Certification Amendment is appropriate.

The City sincerely appreciates your attention to this matter and for working with us on an expedited basis. As noted below, we have provided copies of this request to the parties to the Purdom Site Certification.

If you have any questions or need any additional information concerning this request, please let me know as soon as possible.

Sincerely,



John Powell
Environmental Regulatory Compliance Administrator

Attachments

1. FDEP Storage Tank Regulations Section TRAPS Approval
2. Purdom revised site plan

cc: Rob McGarrah, City of Tallahassee
Gordon King, City of Tallahassee
Angela Morrison, Hopping Green and Sams

CC by e-mail return receipt requested

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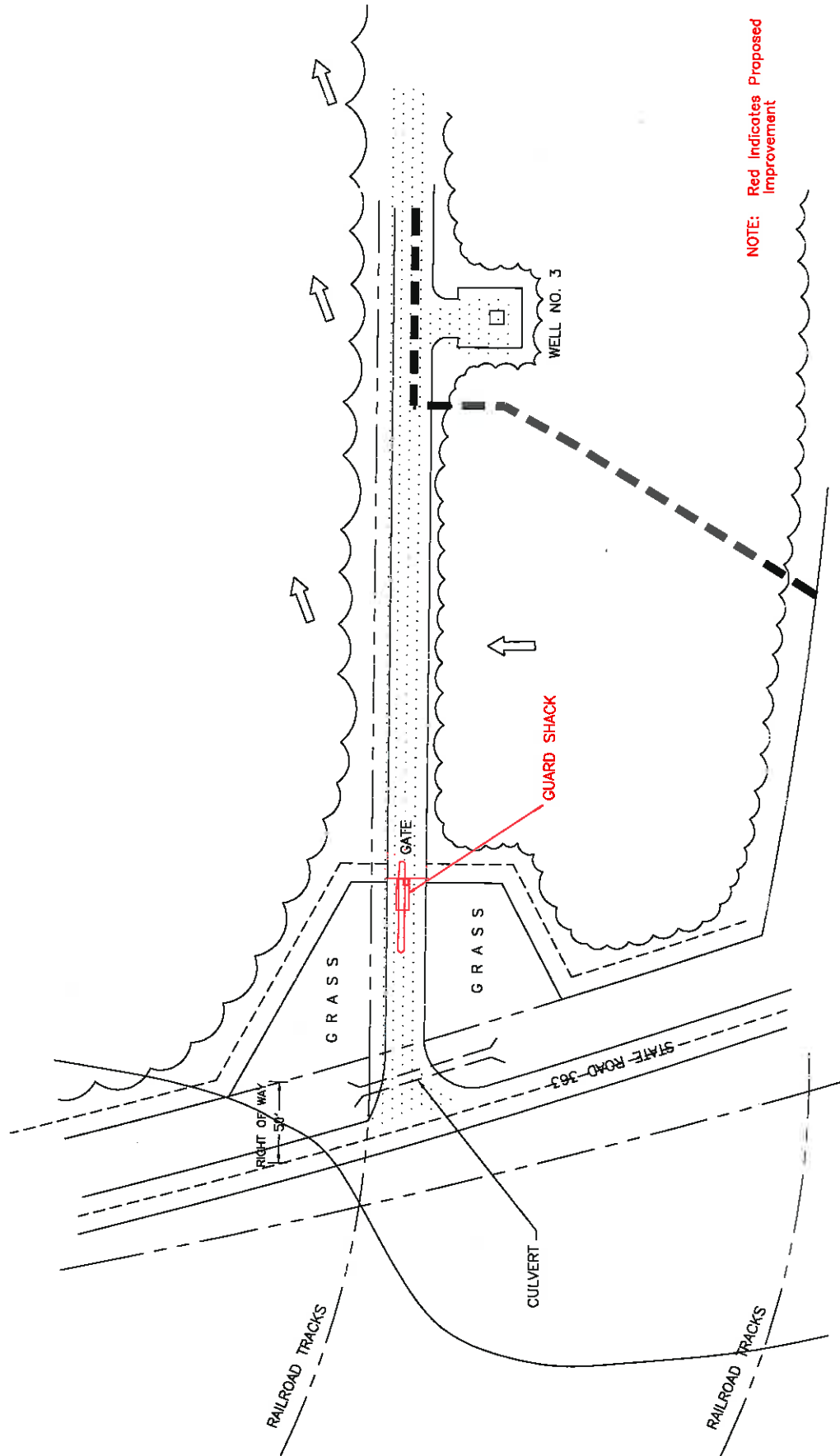
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NOTE: Red Indicates Proposed Improvement

DRAWN BY:		INITIAL	DATE	INL	BY	REVISIONS		DATE	PROJECT		SHEET TITLE		SHEET
CHECKED BY:		INIT							CITY OF TALLAHASSEE ELECTRIC DEPARTMENT PRODUCTION MANAGEMENT TALLAHASSEE, FLORIDA		SITE DEVELOPMENT PURDOM GUARD SHACK		2
SCALE: NTS											GENERAL ARRANGEMENT DETAILED PLAN		2
											COMPUTER FILE - GUARDSHACK STEPLANDS		2
											FILE NO.		2
											PROJECT NO.		2