

March 6, 2001

Mr. Robert E. McGarrah  
Designated Representative  
City of Tallahassee  
Electric Operations  
2602 Jackson Bluff Rd.  
Tallahassee, FL 32304

Re: Petition to use alternative fuel flow data at A. B. Hopkins, Unit 2

Dear Mr. McGarrah:

The EPA has reviewed your October 4, 2000 petition under 40CFR75.66(a). That petition, relating to the City of Tallahassee's A.B. Hopkins, Unit 2, requested permission to use an alternative basis for monitoring fuel flow rate for the time period April 1- June 16, 2000. In particular, your petition sought to use the data recorded by the unit's distributive control system (DCS) in lieu of standard substitute data under 40 CFR part 75, appendix D, section 2.4. Consistent with discussions between you and EPA staff, indicating that the problem would be approved, EPA hereby approves the petition.

According to your petition, the unit's fuel flow data for April 1 - June 16, 2000 were lost at the time the data acquisition and handling system (DAHS) was converted from EDR version 1.3 to EDR version 2.1. Despite this loss, a complete record of the fuel flow data had been recorded simultaneously by the unit's DCS. Furthermore, the City of Tallahassee demonstrated, for a time period soon after the data loss, that the data recorded by the DCS are the same as the data recorded by the DAHS. EPA therefore finds that the DCS-recorded fuel flow data for April 1-June 16, 2000 are probably identical to the DAHS-recorded data that were lost. Under these circumstances, EPA agrees that the data should not be treated as missing and should be used in lieu of using substitute data.

EPA's approval of the petition relies on the accuracy and completeness of the representations and information on the October 4, 2000 petition and is appealable under 40 CFR part 78. I apologize for the delay in providing this formal response to the petition and hope it has not inconvenienced you. Please contact Ms. Kim Nguyen of my staff at (202) 564-9102, if you have any questions.

Sincerely,

/s/  
Brian J. McLean, Director  
Clean air Markets Division

cc: David McNeal, EPA, Region 4  
Lynn Haynes, EPA, Region 4  
Joseph Kahn, Florida Department of Environmental Protection  
Kim Nguyen, EPA, Clean Air Markets Division