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**NOTICE OF FINAL AIR CONSTRUCTION PERMIT**

In the Matter of an  
Application for Permit:

Mr. Gene L. Ussery, Jr.  
V.P. of Power Generation/Transmission  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0328

Permit Project No.: 0330045-007-AC  
Crist Electrical Generating Plant  
Escambia County

Enclosed is the Final Air Construction Permit (letter), No. 0330045-007-AC. The proposed project was requested to establish CAM information for the upcoming Title V Permit Renewal for the Crist Electrical Generating Plant. This request regards conducting various pollutant tests and data acquisition from CEMS for defining parameters that will be used for CAM purposes. The Unit #7's ESP is a new control device for the control of particulate matter and opacity. The facility is located in Escambia County. This permit (letter) is issued pursuant to Chapter 403, Florida Statutes (F.S.). There were no comments received during the Public Notice period (14-days).

Any party to this order (permit) has the right to seek judicial review of the permit revision pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

Trina L. Vielhauer, Chief  
Bureau of Air Regulation

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL AIR CONSTRUCTION PERMIT (including the Final permit (authorization letter)) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 5/7/04 to the person(s) listed or as otherwise noted:

- Mr. Gene L. Ussery, Jr.\*, Responsible Official and V.P. of Power Generation/Transmission, GPC
- Mr. G. Dwain Waters, QEP, Air Quality Programs Supervisor, GPC
- Mr. Gregory N. Terry, P.E., GPC
- ✓ Ms. Sandra Veazey, DEP - NWD
- Mr. Kevin White, DEP - NWD
- Mr. Andy Allen, DEP - NWD
- Mr. Joe Kahn, DEP - BAMMS

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk) 5/7/04 (Date)



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

May 6, 2004

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery, Jr.  
V.P. of Power Generation/Transmission  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0328

Dear Mr. Ussery:

RE: Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's Electrostatic Precipitator (ESP)  
0330045-007-AC

The Department has reviewed the request that you provided on April 6, 2004. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Crist Electrical Generating Plant's Unit #7's ESP (electrostatic precipitator) located in Pensacola, Escambia County. The purpose is to help the company address Compliance Assurance Monitoring (CAM), which will have to be addressed regarding the ESP upon renewal of their Title V Operation Permit. Paragraph 403.061(16), Florida Statutes (F.S.), authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide reasonable and practical regulatory controls consistent with public interest. The control device's parameters to be assessed and established by the testing will be used to create Unit #7's CAM plan, which will define specific operating parameters, or indicators, that the owner or operator shall use to recognize when corrective actions must be taken to avoid non-compliance with the emission unit's permit limitations.

In accordance with the provisions of Paragraphs 403.061(16) and (18), F.S., and Rule 62-210.700(5), F.A.C., you are hereby authorized to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's ESP. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions and opacity standards. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit #7's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, visible emissions, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air and flue gas temperature, and other unit specific parameters that are needed for the computer model.

*"More Protection, Less Process"*

*Printed on recycled paper.*

Mr. Gene L. Ussery, Jr.  
Gulf Power Company  
Crist Electric Generating Plant: Unit #7  
0330045-007-AC  
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The performance tests and parameter measurements or monitoring shall be subject to the following conditions:

1. Unless waived, the permittee shall notify the Department's Northwest District and Bureau of Air Regulation offices at least 15 days prior to commencement of the performance tests and parameter measurements or monitoring. A written report shall be submitted to these offices within 45 days upon completion of the last test run and parameter measurements and monitoring.
2. The authorized testing and measurement and monitoring schedule is from June 1 thru August 31, 2004. If additional time is needed, the permittee shall provide the Department with documentation of the progress accomplished to date and shall identify what is left to be done to complete the testing and measurements or monitoring.
3. The parameters to be measured or monitored are sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), particulate matter, visible emissions, carbon dioxide (CEM), particulate size distribution, ash content of the fuel, ultimate fuel analyses, load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model.
4. Emissions testing shall be conducted for the following pollutants and using the following test methods:
  - a. Particulate matter           EPA Test Method 17 (including EPA Test Methods 1 thru 4)
  - b. Visible emissions           EPA Test Method 9
5. The release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C., is not authorized for this activity.
6. Performance testing shall immediately cease upon the occurrence of a valid environmental complaint by a citizen or other party, or a nuisance or danger to the public health or welfare. Performance testing shall not resume until appropriate measures to correct the problem have been implemented.
7. The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida.
8. This Department action is just to authorize the performance testing and parameter measurements and monitoring for the Crist Unit #7's ESP for the purpose of developing a CAM protocol.
9. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
10. The Department shall be notified in writing on the date of the last test run and parameter measurement and monitoring completion. If after work hours, notification shall occur on the next work day.

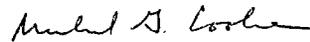
Mr. Gene L. Ussery, Jr.  
Gulf Power Company  
Crist Electric Generating Plant: Unit #7  
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11. Attachment Section.

- a. Mr. G. Dwain Waters's letter received April 5, 2004.
- b. Public Notice affidavit received April 26, 2004.
- c. Final Determination.

The Department has relied on the information referenced in the Attachment Section and conversations with representatives of Gulf Power Company in authorizing this activity.

Sincerely,



Michael G. Cooke, Director  
Division of Air Resource Management

MGC/rbm

Enclosures

cc: Trina Vielhauer, DEP - BAR  
Jim Pennington, DEP - BAR  
Sandra Veazey, DEP - NWD  
Andy Allen, DEP - NWD  
Joe Kahn, DEP - BAMMS  
G. Dwain Waters, Q.E.P., GPC  
Gregory N. Terry, P.E., GPC

**Final Determination**

**Gulf Power Company**

**Project No.: 0330045-007-AC**

**I. Public Notice and Comments.**

The Public Notice of the permitting project was published in the Pensacola News Journal on April 17, 2004. There were no written comments received in the commenting period (14-days), which concluded at the close of business of May 1<sup>st</sup>. Therefore, it is recommended that the Final air construction permit (authorization letter) be issued.

**II. Conclusion.**

It is recommended to issue the Final air construction permit (authorization letter) as drafted and public noticed.