PERMITTEE

Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0100

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Final Permit No. 0330045-037-AV
Crist Electric Generating Plant
Title V Air Operation Permit Revision

The purpose of this permitting project is to revise the existing Title V Air Operation Permit No. 0330045-025-AV for the above referenced facility to incorporate minor revisions from air construction Permit No. 0330045-036-AC, issued concurrently with the draft of this permit and to incorporate several specific conditions from previously issued air construction permits for the existing Crist Electric Generating Plant.

NOTICE AND PUBLICATION

The Department distributed a draft/proposed Title V Air Operation permit revision package on April 16, 2013. The applicant published the Public Notice in the Pensacola News Journal on April 19, 2013. The Department received the proof of publication on April 23, 2013.

COMMENTS

No comments on the draft proposed permit were received from the public or the EPA Region 4.

On May 2, 2013, the Department received comments on the draft/proposed permit revision from the applicant during the 30-day comment period. The comments were not considered significant enough to reissue the draft/proposed permit and require another Public Notice; therefore, the final Title V air operation permit includes the following minor corrections. Additions to the permit are indicated below by double underline. Deletions from the permit are indicated below by ~~strikethrough~~.

The comments below were received from the applicant on the draft/proposed permit revision:

Comments 1 and 7: The permittee requests that the Specific Condition **A.48.** be revised from a "10 day average" to a "30 day average" which is more representative of the sulfuric acid mist (SAM) plant wide limit of 165.5 tons during any consecutive 12 months as outlined in Specific Condition **A.16.** of the draft/proposed Title V permit.

***Responses 1 and 7*:** The Department has determined that Specific Condition **A.48.** must remain. Changing the averaging time when additional testing is required will require that the lime injection rates be re-established to assure proper control so that the SAM plant wide limit is not exceeded. Desired changes to the reasonable assurance conditions previously established in a Prevention of Significant Deterioration (PSD) avoidance project will require a separate construction permit revision request. Additional testing to re-establish the necessary lime injection rates will not be required unless the actual coal blend sulfur specification increases more than 0.3 lb SO_2/MMBtu based on a 10-day average above the level previously tested. No changes were made in response to these comments.

Comment 2: Specific Condition **A.l5.** Sulfur Dioxide (SO_2). Item "a." appears to conflict with item "e." The permittee requests the following statement be added to item a., "except as provided in item e. below" in order to clarify the alternative limit during the Crist FGD Bypass.

***Response 2*:** The requested clarification is acceptable and has been made in Specific Condition **A.l5.** as follows:

a. *All Fuels*. ~~S~~Except as provided in item e. below, sulfur dioxide emissions shall not exceed 2.40 pounds per million Btu heat input, as measured by applicable compliance methods. [Permit Nos. 0330045-008-AC and 0330045-010-AC]

Comment 3: Specific Condition **A.24.** SAM Monitoring. The permittee interprets the statement" .... shall monitor compliance with the SAM emissions cap by conducting the required performance tests .... " as pertaining to any additional tests required pursuant to requirements outlined under Specific Condition **A.48.**

Response 3**:** The Department agrees with the permittee's interpretation that additional SAM compliance tests are only required if the actual coal blend sulfur specification increases by 0.30 lb SO_2/MMBtu or more based on a 10-day average above the current maximum tested coal blend sulfur specification, as specified in Specific Condition A.48. No changes were made to the permit in response to this comment.

Comments 4 and 5: Specific Condition **A.36.** Annual Compliance Tests Required. The condition references Specific Conditions **A.13. - A.19.** The permittee interprets the requirement outlined in **A.16.** as not requiring annual testing unless otherwise required by Specific Condition **A.48.**

Responses 4 and 5**:** The requested clarification is acceptable and has been made in Specific Condition **A.36.** as follows:

A.36. Annual Compliance Tests Required. Except as provided in Appendix ASP B-97-01 (attached), during each federal fiscal year (October 1st to September 30th), in accordance with the requirements listed below and to demonstrate compliance with the emission limits in Specific Conditions ~~**A.13 - A.19.**~~ **A.13., A.14, A.15., A.17., A.18.** and **A.19.**: Units -004 and -005 shall be tested for VE, SO_2 and PM; Units -006 and -007 shall be tested for VE, NO_X, SO_2, PM; Unit -007 shall be tested for ammonia slip; and, Unit -015 shall be tested for VE. [Rule 62-297.310(7)(a)4., F.A.C., Permit Nos. 0330045-005-AC, 0330045-023-AC and 0330045-028-AC]

{Permitting Note: The annual SO_2 and NO_X tests that are required by Rule 62-297.310(7), F.A.C., can be done during the annual RATAs as satisfaction of this requirement, provided all other testing requirements specified in the permit are met. Once CEMS are installed and operational in the bypass stacks and continuous compliance can be demonstrated, completion of the annual RATAs will replace the need for SO_2 or NO_X stack tests.}

Comment 6: Specific Condition **A.47.** SAM. The condition is redundant of Specific Condition **A.24.** and should be deleted.

Response 6**:** Specific Condition **A.24.** is a reasonable assurance requirement for monitoring SAM emissions, while Specific Condition **A.47.** a compliance requirement related to SAM emissions cap. The conditions are similar, but not exactly the same. No changes were made to the permit in response to this comment.

CONCLUSION

The final action of the Department is to issue the final Title V air operation permit No. 0330045-037-AV, with the minor administrative changes noted above.