

INTEROFFICE MEMORANDUM

TO: ~~Howard Rhodes~~ *by [signature]*
THRU: A. A. Linero *[signature] 10/28*
FROM: Bruce Mitchell *RAM*
DATE: October 26, 2002

SUBJECT: Additional Time 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 Electric Generating Plant's Unit No. 6's and Lansing Smith's Units Nos. 1's and 2's Electrostatic Precipitators

A request for each referenced facility and emissions units was received on October 24, 2002, asking for additional time to conduct some pollutant testing and parameter measurements for CAM issues. The original authorization letters provided for an extension of time to conduct the proposed tests and monitoring so long some justification was provided (see Conditions No. 2). This was received and the proposed additional time authorization letters have been edited for signature. Also, a discussion with Pat Comer concluded that no additional Public Noticing would be required for these time extensions.

The original proposed project was Public Noticed in the Pensacola News Herald on July 11, 2002. No comments were received during the Public Notice period (14-days), which concluded on July 25, 2002.

In conclusion, it is recommended that the additional time authorization letters be signed.

HLR/rbm

Attachments



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

October 28, 2002

CERTIFIED MAIL – Return Receipt Requested

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

Dear Mr. Ussery:

RE: Additional Time Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Lansing Smith Electric Generating Plant's Units Nos. 1 & 2's Electrostatic Precipitator (ESP)
0050014-004-AC

The Department has reviewed the request that you provided on June 5, 2002; and, the request for additional time authorization received October 24, 2002. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Lansing Smith Electric Generating Plant's Units Nos. 1 & 2's ESP (electrostatic precipitator) located in Lynn Haven, Bay 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.

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 Lansing Smith Electric Generating Plant's Units Nos. 1 & 2'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 Lansing Smith Units Nos. 1 & 2's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), particulate matter, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also.

"More Protection, Less Process"

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Mr. Gene L. Ussery
Gulf Power Company
Lansing Smith Electric Generating Plant: Units Nos. 1 & 2
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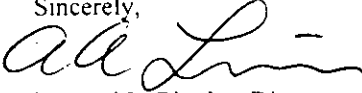
The performance tests and parameter measurements or monitoring shall be subject to the following conditions:

1. Unless waived, the permittee shall notify the Department's Northwest District Office, Northwest District Branch Office - Panama City, and Bureau of Air Regulation Office 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 October 28, 2002, through June 30, 2003. 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, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also.
4. Emissions testing shall be conducted concurrently 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 performance test plans are as follows:
 1. Conduct a performance test (three 1-hour runs) using EPA Method 17 at "normal" operations;
 2. Conduct a performance test (three 1-hour runs) using EPA Method 17 at a reduction in the ESP efficiency; and,
 - 3.a. If the test results show that the PM allowable limit was exceeded; then the ESP's efficiency will be increased and a third performance test using EPA Method 17 will be conducted (supposedly between "normal" and "at the reduced efficiency"); or,
 - b. If the test results show that the PM allowable limit was not exceeded; then the ESP's efficiency will be further decreased and a third performance test using EPA Method 17 will be conducted in an attempt to define the outer range of the ESP's efficiency at which the PM allowable limit will be exceeded; and,
 - c. If the outer range is not established by the 2nd and 3rd performance tests, then the performance testing is ended for that emissions unit; and, Gulf Power Company will use the data to help define their CAM Plan for that emissions unit tested.
6. The release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C., is not authorized for this activity.
7. 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.

Mr. Gene L. Ussery
Gulf Power Company
Lansing Smith Electric Generating Plant: Units Nos. 1 & 2
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8. The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida.
9. This Department action is just to authorize the performance testing and parameter measurements and monitoring for the Lansing Smith Units Nos. 1 & 2's ESP for the purpose of developing a CAM protocol.
10. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
11. 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.
12. Attachment Section.
 - a. Mr. G. Dwain Waters's letter received June 5, 2002.
 - b. Final Determination.
 - c. Mr. G. Dwain Waters's letter received October 24, 2002.
 - d. Additional time authorization letter dated October 28, 2002.

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,

for Howard L. Rhodes, Director
Division of Air Resource Management

HLR/rbm

Enclosures

cc: Scott Sheplak, DEP - BAR
Sandra Veazey, DEP - NWD
Kevin White, DEP - NWD
Gary Shaffer, DEP - NWDB
Joe Kahn, DEP - BAMMS
G. Dwain Waters, Q.E.P., GPC
Gregory N. Terry, P.E., GPC

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

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

2. Article Number (Copy from service label)

7000 0600 0021 6524 2786

COMPLETE THIS SECTION ON DELIVERY

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R. Beach

B. Date of Delivery

10-29-03

C. Signature

X R. Beach

Agent

Addressee

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3. Service Type

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PS Form 3800, July 1999

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One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

OCT 24 2002

DIVISION OF AIR
RESOURCES MANAGEMENT

Certified Mail



October 21, 2002

R. Bruce Mitchell
Title V Section – Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

RE: LANSING SMITH ELECTRIC GENERATING PLANT
AUTHORIZATION TO EXTEND CAM PROTOCOL TESTING
PERMIT No: 0050014-004-AC

Thanks again for meeting with Mike Markey and me last week regarding our continuing efforts to prepare protocols for Compliance Assurance Monitoring (CAM). As outlined in our meeting, Gulf Power is requesting the construction permit for conducting CAM testing at Plant Lansing Smith be extended until June 30, 2003. This request is pursuant to budgetary constraints facing Gulf Power in 2002 and due to the unexpected waterwall replacement project on Unit 2 permitted to begin in January, 2003. CAM testing will need to be conducted after the completion of this project.

Attached is an authorization statement by Gene L. Ussery, Jr., the Responsible Official outlining his approval of this permit extension request.

If you have any questions or need further information regarding the test procedures or CAM protocol development for Plant Lansing Smith, please call me at (850) 444.6527.

Sincerely,

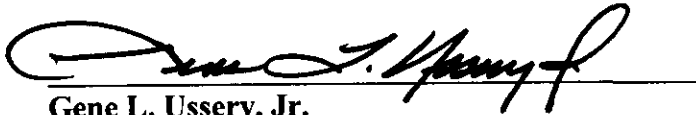
G. Dwain Waters, Q.E.P.
Air Quality Programs Supervisor

cc: w/att: Jim. Vick, Gulf Power Company
Trey Hall, Gulf Power Company
Marie Largilliere, Gulf Power Company
Kevin Beaty, Gulf Power Company
Clark Mitchell, Southern Company Services
Gary Perko, HGSS
Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida

**CERTIFICATION BY RESPONSIBLE OFFICIAL
LANSING SMITH UNITS 1 & 2 COMPLIANCE ASSURANCE
MONITORING TEST PERMIT EXTENSION REQUEST**

“I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Lansing Smith Electric Generating Plant for which this permit extension is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this request are true, accurate and complete.”

Responsible Official Signature:



**Gene L. Ussery, Jr.
Vice-President of Power Generation**

10-17-02
Date: