

Charles D. McCrary  
Chief Production Officer  
President -  
Southern Company Generation

600 North 18th Street / 15N-8170  
Post Office Box 2641  
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Tel 205.257.2243  
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November 23, 1999

RECEIVED

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BUREAU OF AIR REGULATION



Mr. Clair H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Air Resources Management Division  
Florida Department of Environmental Protection  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399 - 2400

Dear Mr. Fancy:

This letter is provided in accordance with the requirements outlined in Section IV Acid Rain Part and Appendix CP.-1 of the Crist Electric Generating Plant, Scholz Electric Generating Plant, and the Lansing Smith Electric Generating Plant Title V permits. On December 8, 1997, Southern Company submitted a Phase II NOx Averaging Plan to the States of Alabama, Florida, Georgia, and Mississippi and to Jefferson County, Alabama, with copies to the U.S. Environmental Protection Agency at Region IV and the Acid Rain Division. The plan was updated on April 15, 1999, from 71 to 75 units operated by Southern Company across the four state region. Following several comments from EPA Region IV and a few administrative changes, the plan was signed and resubmitted on July 23, 1999.

The initial Southern Company NOx averaging plan has been approved by the Alabama Department of Environmental Management, Georgia Environmental Protection Division, Mississippi Department of Environmental Quality, and the Jefferson County, Alabama, Department of Health. In conjunction with final approval of the averaging plan, the agencies have or are in the process of updating permits for these units per the November 18, 1999, letter to you from Mr. R. Douglas Neeley, U.S. Environmental Protection Agency.

This certification is based on information and belief formed after reasonable inquiry. To the best of my knowledge, the statements and information in this document are true, accurate, and complete as required by 62-213.420 (4) F.A.C.

If you have questions about the plan or the status of approval, please contact Mr. Danny Herrin, Manager, Clean Air Compliance, Southern Company Generation, at (205) 257-6468.

Sincerely,

cc: Ronald W. Gore, Alabama Department of Environmental Management  
Ronald C. Methier, Georgia Environmental Protection Division  
Dwight Wylie, Mississippi Department of Environmental Quality  
James I. Carroll, Jefferson County Department of Health  
R. Doug Neeley, U.S. Environmental Protection Agency  
Robert Miller, U.S. Environmental Protection Agency

## Appendix H-1, Permit History/ID Number Changes

(For Tracking Purposes Only)

Gulf Power Company  
Lansing Smith Plant

Permit No.: 0050014-001-AV  
Facility ID No.: 0050014

E.U.								
ID No	Description	Permit No.	Issue Date	Expiration Date	Extended Date	Revised Date(s)	MW Output	Heat Input (MMBtu/hr)
-001	Lansing Smith #1 - Stack	AO03-211310	04/17/92	04/01/97			175	(1,768) <sup>1,2</sup>
		AO03-134885	07/09/87	06/01/92			175	(1,768) <sup>1,2</sup>
		AO03-56886	07/15/82	07/01/87			175	(1,566) <sup>1,3</sup>
		Secretarial ORDER <sup>4</sup>	10/18/85					
		Secretarial ORDER <sup>5</sup>	12/07/82					
		AO03-2031	08/17/77	08/17/82			N/S	1,556
		AC03-2023	02/10/75	01/01/77	05/15/77		N/S	1,229
-002	Lansing Smith #2 - Stack	AO-3-1133	01/29/73	12/15/74			130	1,300
		AO03-211310	04/17/92	04/01/97			205	(2,042) <sup>1,2</sup>
		AO03-134887	07/09/87	06/01/92			205	(2,042) <sup>1,2</sup>
		AO03-56888	07/15/82	07/01/87			205	(1,974) <sup>1,3</sup>
		Secretarial ORDER <sup>4</sup>	10/18/85					
		Secretarial ORDER <sup>5</sup>	12/07/82					
		AO03-7636	03/22/78	03/22/83			N/S	1,924
AC03-2024	02/10/75	01/01/77	05/15/77		N/S	1,404		
	AO-3-1132	01/29/73	12/15/74			140.75	1,406	
-003	Peaking Turbines	AO03-249657	05/19/94	01/15/96				

### ID Number Changes (for tracking purposes):

From: Facility ID No.: 10PCY030014

To: Facility ID No.: 0050014

<sup>1</sup> Number in parenthesis indicates number reported in application, not specified in the permit.

<sup>2</sup> "Maximum allowable heat input is that heat input necessary to maintain electrical load output at 110% of the level at which the most recent successful particulate matter compliance test was conducted."

<sup>3</sup> "Maximum allowable heat input is that heat input necessary to maintain electrical load output at the level at which the most recent successful quarterly particulate matter test was conducted."

<sup>4</sup> Secretarial ORDER issued to relax semi-annual PM testing requirement to annual.

<sup>5</sup> Secretarial ORDER issued to relax quarterly PM testing requirement to semi-annual.

Memorandum

Federal Department of  
Environmental Protection

TO: Ed Middleswart, NWD

FROM: Bruce Mitchell *SC for BM*

DATE: November 18, 1996

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit  
Gulf Power Company: 0050014-001-AV

The Title V operating permit application package for the referenced facility is being processed in Tallahassee. The application was previously forwarded to your office for your files and future reference. Please have someone review the package for completeness and respond in writing by December 15, 1996, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Jonathan Holtom, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bm

cc: Andy Allen



# Florida Department of Environmental Protection

Northwest District  
160 Governmental Center  
Pensacola, Florida 32501-5794

ENTERED  
MAY 2 2 1994  
Virginia B. Wetberell  
Secretary

PERMITTEE:  
Gulf Power Company

I.D. Number: 10PCY03001403  
Permit/Certification Number: AO03-249657  
Date of Issue: May 19, 1994  
Expiration Date: January 15, 1996  
County: Bay  
Latitude/Longitude: 30°15'58"N/85°41'56"W  
Project: Two combustion turbines/peaking unit

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of two combustion turbines (A and B) fueled by No. 2 fuel oil (distillate) with a maximum of 0.5% sulfur and a maximum heat input of 542 MMBtu/hour used to drive a single peaking generator.

Operation of this source shall be consistent with the operation permit application dated April 15, 1994.

Located at West Bay in Lynn Haven, Bay County.

Specific Condition No. 2 establishes a maximum allowable operating and testing rate.

Specific Condition No. 4 limits the fuel oil to No. 2 oil with a maximum of 0.5% sulfur by weight.

Specific Condition No. 5 establishes emission limits.

Specific Condition No. 6 establishes compliance testing requirements.

Specific Condition No. 7 requires annual operation reports.

Specific Condition No. 8 requires submission of a Major Air Pollution Source Annual Operation Fee form.

Specific Condition No. 9 requires submission of a Title V permit application.

PERMITTEE:  
Gulf Power Company

I.D. Number: 10PCY03001403  
Permit/Certification Number: AO03-249657  
Date of Issue: May 19, 1994  
Expiration Date: January 15, 1996

### SPECIFIC CONDITIONS:

#### General

1. The attached General Conditions are part of this permit (FAC Rule 17-4.160).

#### Operation

2. The maximum allowable operating rate is 542 MMBtu per hour. This is the operating rate at which compliance with standards shall be demonstrated. Testing of emissions shall be conducted at 95 to 100% of the manufacturer's rated heat input based on the average ambient air temperature during the test. Compliance shall be determined using the turbine manufacturer's throughput rating for the average ambient temperature by multiplying the permitted emission limit at ISO conditions (59°F and 60% humidity) by the ratio of the tested heat input to the maximum heat input (MMBtu/hr) at ISO conditions. Manufacturer's rating data for correcting heat input and emissions to other temperatures must be submitted to the Department at least 30 days before the first compliance test. Manufacturer's data shall be continually validated by scheduling subsequent annual tests for successive quarters of the year. If it is impracticable to test at capacity, then sources may be tested at less than capacity; if the source is tested at less than capacity, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacity is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit with prior notification to the Department. (FAC Rule 17-4.070)

3. The maximum hours of operation are 24 hours/day, 7 days/week, and 52 weeks/year. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually. (Application dated 04/15/94)

4. The maximum sulfur content of the No. 2 fuel oil is limited to 0.5% sulfur by weight. The Permittee shall maintain a log available for Department inspection of the fuel oil sulfur content. (Application dated 04/15/94)

#### Emissions

6. The maximum allowable emission limit for each pollutant is as follows:

Pollutant	FAC Rule	Allowable Emissions
VE	17-296.310	20% opacity

PERMITTEE:  
Gulf Power Company

I.D. Number: 10PCY03001403  
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PERMITTEE:  
Gulf Power Company

I.D. Number: 10PCY03001403  
Permit/Certification Number: AO03-249657  
Date of Issue: May 19, 1994  
Expiration Date: January 15, 1996

SPECIFIC CONDITIONS:

Testing

6. Emissions tests for visible emissions shall be performed between October 1 and November 30, 1998 in accordance with the test methods and frequency indicated, with notification to the Department 15 days prior to testing. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. For good cause, the Permittee may request an extension of a compliance test due date. However, inadequate planning of testing does not constitute good cause for an extension of the compliance test due date. The test report documentation must be submitted to the Department within 45 days after completion of testing.

<u>Pollutant</u>	<u>Frequency</u>	<u>Test Method</u>	<u>Reference</u>
VE	once/permit	DEP method 9	FAC Rule 17-297

The VE test shall be for a duration of 60 minutes. Test reports shall comply with F.A.C. Rule 17-297.570, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 17-297.340(2).

Administrative

7. An annual operation report [DEP Form 17-210.900(4) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the Permittee and used for future annual submittals (FAC Rule 17-210.370).

8. In accordance with F.A.C. Rule 17-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 17-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the Permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

9. An application to renew this permit shall be submitted as required for a Title V permit (FAC Rule 17-210).

SPECIFIC CONDITIONS:

10. The permanent source identification number for this point source is 10PCY03001403. Please cite this number on all test reports and other correspondence specific to this permitted point source. (FAC Rule 17-297.570)

11. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, use telephone number (904) 872-4375 during normal working hours. (FAC Rule 17-210.700)

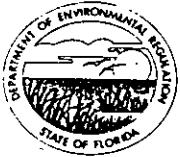
Expiration Date:

Issued this 19<sup>th</sup> day of May,  
1994.

January 15, 1996

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
BOBBY A. COOLEY  
District Director



## Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:  
Gulf Power Company

I.D. Number: 10PCY03001401 and 02  
Permit/Certification Number: ACO3-211310  
Date of Issue: April 17, 1992

Expiration Date: April 1, 1997  
County: Bay  
Latitude/Longitude: 30°16'08"N/85°42'02"W  
Section/Township/Range: 36/2S/15W  
Project: Smith Units No. 1 and No. 2  
Coal Fired Boilers

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of Smith Units No. 1 and No. 2, both coal fired boilers, generating 175 and 205 megawatts of electricity for Units No. 1 and No. 2 respectively. Particulate emissions from each Unit are controlled by hot side electrostatic precipitators manufactured by Buell Model BAL 2X34N333-4-3P followed by cold side electrostatic precipitators manufactured by American Standard Series 371, Design 24-9P. Sulfur dioxide emissions are controlled by the sulfur content of the coal used as fuel. Sulfur dioxide, nitrogen dioxide, oxygen and opacity are monitored by continuous emission monitors on each Unit.

Located at the end of County Road 391, north shore of North Bay, 2.5 miles northwest of Lynn Haven.

Specific Condition No. 7 requires logging excess emissions.  
Specific Condition No. 8 requires keeping a maintenance log.  
Specific Condition No. 9 requires submitting quarterly excess emissions reports.  
Specific Condition No. 11 requires annual particulate emissions tests due before the end of September.  
Specific Condition No. 12 requires maintenance of a QC program.  
Specific Condition No. 14 requires reporting of excess emissions as soon as possible.  
Specific Condition No. 15 requires actions taken upon particulate test failures.  
Specific Condition No. 18 requires submittal of permit renewal application by February 1, 1997.

*Specific Condition No. 16 requires submittal of annual operation reports*

PERMITTEE:  
Gulf Power Company

I.D. Number: 10PCY03001401 and 02  
Permit/Certification Number: ACO3-211310  
Date of Issue: April 17, 1992

Expiration Date: April 1, 1997

### SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. The maximum allowable heat inputs are those heat inputs necessary to maintain electrical load output at 110% of the level at which the most recent successful particulate emissions compliance test was conducted for each unit. If the test was conducted at less than 90% of rated capacity of the unit, permittee may operate the unit at loads up to the rated capacity (175 and 205 megawatts for Units No. 1 and No. 2 respectively) for purposes of preparation for testing for up to ten calendar days. The Department shall be advised in writing prior to each testing.
3. Particulate emissions shall not exceed 0.1 pounds per million Btu heat input.
4. Sulfur dioxide emissions shall not exceed 5.90 pounds per million Btu heat input.
5. Visible emissions shall not exceed 40% opacity.
6. Excess emissions are defined as:
  - A. Any six-minute average for opacity which exceeds the standard.
  - B. Any 24-hour average for sulfur dioxide which exceeds the standard.
7. A log shall be maintained showing the:
  - A. Duration of excess visible emissions and their causes.
  - B. Duration of excess SO<sub>2</sub> emissions.
8. A maintenance log of the continuous monitoring system shall be kept showing:
  - A. Time out of service.
  - B. Calibrations and adjustments.
9. A quarterly report of excess emissions shall be submitted within 30 days following the end of each calendar quarter. The report shall consist of each individual exceedance of opacity or SO<sub>2</sub> emissions (Specific Conditions 6 and 7) with duration, magnitude and cause. Any exceedance that is beyond the allowances of FAC Rule 17-2.250 shall be highlighted with note indicating compliance with Specific Condition 14 below.
10. Units 1 and 2 use a common stack. Visible emission violations from this stack shall be attributed to both Units unless opacity meter results show the specific Unit causing the violation.

PERMITTEE:  
Gulf Power Company

I.D. Number: 10PCY03001401 and 02  
Permit/Certification Number: A003-211310  
Date of Issue: April 17, 1992

Expiration Date: April 1, 1997

SPECIFIC CONDITIONS:

11. Particulate emissions tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with EPA methods 1, 2, 3 and 17. Such tests shall be conducted once per year before the end of September. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.

12. Continuous SO<sub>2</sub> emission monitoring 24-hour averages are required to demonstrate compliance with the standard of the Department (Specific Condition 4). A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO<sub>2</sub> emission standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the permittee has verified the problem or no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO<sub>2</sub> emission compliance by the temporary use of a spare SO<sub>2</sub> emission monitor. The spare SO<sub>2</sub> emissions monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

Maintain a QC program. As a minimum the QC program must include written procedures which should describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. CD determination and adjustment of CEMS.
3. Preventative maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling and analysis methods.
6. Program of corrective action for malfunctioning CEMS.

13. Excess emissions as stated in Florida Administrative Code Rule ~~17-2.250~~ 210.900(3) shall be allowed.

14. The Department shall be notified as soon as possible (by telephone) of excess emissions that are beyond the allowances of FAC Rule 17-2.250, such as:

- A. Any soot blowing or load changes that cause excess visible emissions for a period longer than three hours, or that exceed 60% opacity (six minute average) more than four times in any one day.
- B. Any malfunction that causes visible emissions for a period longer than two hour in any one day.

C. A 24-hour average of SO<sub>2</sub> emissions measured by the continuous monitor that exceeds the standard, or daily average SO<sub>2</sub> emissions measured by coal analysis (in the event the permittee chooses) that exceeds the standard.

Immediately upon notification of excess emissions that are beyond the allowances, the permittee shall take the necessary steps to determine the cause and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation with corrective action to avoid recurrence.

PERMITTEE:  
Gulf Power Company

I.D. Number: 10PCY03001401 and 02  
Permit/Certification Number: A003-211310  
Date of Issue: April 17, 1992

Expiration Date: April 1, 1997

SPECIFIC CONDITIONS:

15. Immediately upon notification of a particulate test report that fails to demonstrate compliance with the particulate emission limit of 0.1 pounds per million Btu heat input, the permittee shall take necessary steps to determine the cause of the test failure and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation and a schedule for retesting when the cause of the test failure has been determined and corrected.

16. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.

17. An application to renew this permit shall be submitted prior to February 1, 1997.

18. The permanent source identification numbers for these point sources are:  
10PCY03001401 Smith Unit No. 1, and  
10PCY03001402 Smith Unit No. 2.  
Please cite the appropriate number on all test reports and other correspondence specific to a permitted point source.

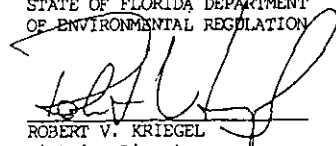
19. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 872-4375 during normal working hours.

Expiration date:

Issued this 17th day of April, 1992.

April 1, 1997

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
ROBERT V. KRIEGEL  
District Director

210.900(3)  
0.3 #/MMBTU  
3 hr / 24 hr