

Florida Department of
Environmental Protection

Memorandum

To: Joseph Kahn, Division of Air Resource Management
Through: Trina Vielhauer, Bureau of Air Regulation SA JAV
From: Jeff Koerner, New Source Review Section JK
Date: December 19, 2008
Subject: Final Air Permit No. 0050014-016-AC
Gulf Power Company, Lansing Smith Electric Generating Plant
Revised Units 1 & 2 SNCR Project
New NO_x Emissions Cap

Gulf Power Company operates the Lansing Smith Electric Generating Plant, which is located in Bay County at 4300 County Road in Lynne Haven, Florida. Originally, Permit No. 0050014-013-AC authorized construction of the new selective non-catalytic reduction (SNCR) systems for existing Units 1 and 2. Project No. 0050014-016-AC revises the original permit to require the use of SNCR to comply with a new NO_x emissions cap for these two units based on the final design and capabilities of the equipment. The project will reduce actual annual NO_x emissions and is not subject to PSD preconstruction review.

The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached Final Permit for this project.

Attachments

TLV/jfk

NOTICE OF FINAL AIR PERMIT

Sent by Electronic Mail – Received Receipt Requested

G. Dwain Waters, Q.E.P.
Special Projects and Environmental Assets Coordinator
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0328

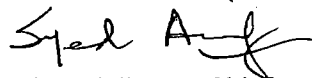
Air Permit No. 0050014-016-AC
Lansing Smith Electric Generating Plant
Revised Units 1 & 2 SNCR Project
Bay County, Florida

Dear Mr. Waters:

Enclosed is the final air construction permit to revise original Permit No. 0050014-013-AC, which authorized the construction of selective non-catalytic reduction (SNCR) system for Units 1 and 2 at the existing Lansing Smith Electric Generating Plant, which is located 4300 County Road, Lynne Haven, Bay County, Florida. This revision requires the operation of the SNCR systems to comply with a new NO_x emissions cap for these units. As noted in the attached Final Determination, no comments were received on the draft permit. This final permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) 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 must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

for 
Trina Vielhauer, Chief
Bureau of Air Regulation

TLV/jfk

NOTICE OF FINAL AIR PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 12/24/08 to the persons listed below.

- Mr. G. Dwain Waters, Gulf Power Company (gdwaters@southernco.com)
- Mr. Gregory N. Terry, Gulf Power Company (gnterry@southernco.com)
- Mr. Rick Bradburn, NWD Office (rick.bradburn@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epamail.epa.gov)
- Ms. Vickie Gibson, BAR Reading File (victoria.gibson@dep.state.fl.us)
- Mr. Mike Halpin, DEP Siting Office (mike.halpin@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



(Clerk)

12/24/08
(Date)

FINAL DETERMINATION

PERMITTEE

Gulf Power Company
One Energy Place
Pensacola, FL 32520-0328

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Bureau of Air Regulation, New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. 0050014-016-AC
Lansing Smith Electric Generating Plant, Revised Units 1 & 2 SNCR Project

The original permit authorized the construction of a new wet flue gas desulfurization system (FGD) for Units 4 - 7 at the existing Crist Electric Generating Station (SIC No. 4911), which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida. This permitting action revises the permit to require the use of the SNCR systems to comply with a new NO_x emissions cap for the units based on the final design and capabilities of the equipment.

NOTICE AND PUBLICATION

The Department distributed an Intent to Issue Air Permit package on November 6, 2008. The applicant published the Public Notice in the The News Herald on November 26, 2008. The Department received the proof of publication on December 2, 2008.

COMMENTS

No comments on the Draft Permit were received from the public, the Department's Northwest District Office, the EPA Region 4 Office or the applicant.

CONCLUSION

The final action of the Department is to issue the permit as drafted.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE

Gulf Power Company
One Energy Place
Pensacola, FL 32520-0328

Authorized Representative:

G. Dwain Waters, Q.E.P.
Special Projects and Environmental Assets Coordinator

Lansing Smith Electric Generating Plant
Revised Units 1 & 2 SNCR Project
Facility ID No. 0050014
SIC No. 4911
Air Permit No. 0050014-016-AC
Permit Expires: December 31, 2009

PROJECT AND LOCATION

This revised permit requires installation and operation of a selective non-catalytic reduction (SNCR) system for Units 1 and 2 and establishes a new NO_x emissions cap for these units at the existing Lansing Smith Electric Generating Plant, which is located at 4300 County Road, Lynne Haven, Bay County, Florida. The map coordinates are: Zone 16; 625.05 km East; and 3349.24 km North.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, Florida Administrative Code (F.A.C.). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department. This air construction permit supplements all other valid air construction and operation permits.

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

Executed in Tallahassee, Florida

Joseph Kahn, Director
Division of Air Resource Management

12/23/08

(Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

The existing plant consists of two coal fired steam generators (boilers); one combustion turbine (used to drive a single generator) driven by two jet engines; and, two gas-fired combined-cycle combustion turbine electrical generators with duct-fired heat recovery steam generators (HRSG). The two boilers are Acid Rain Phase II Units. The two combined-cycle combustion turbines are also Acid Rain units. Pulverized coal is the primary fuel for the boilers. Distillate fuel oil is used to fire the combustion turbine and as a "back-up" fuel for the boilers. The following units are affected by this air construction permit.

ID	Emission Unit Description
-001	Boiler Number 1 - 1,944.8 MMBtu/hour (Phase II Acid Rain Unit)
-002	Boiler Number 2 - 2,246.2 MMBtu/hour (Phase II Acid Rain Unit)

This permit requires the installation and operation of High-Energy Reagent Technology (HERT) selective non-catalytic reduction (SNCR) systems on Units 1 and 2 to reduce emissions of nitrogen oxides (NO_x). High momentum injector ports will also be added to Unit 1. Unit 2 is already equipped with over fired air technology.

REGULATORY CLASSIFICATION

Title III: The existing facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The existing facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

REVISION

Originally, Permit No. 0050014-013-AC authorized construction of the new SNCR systems for existing Units 1 and 2. Project No. 0050014-016-AC revises the original permit to establish a new NO_x emissions cap for these two units based on the final design and capabilities of the equipment.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct, modify, or operate emissions units at this facility shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all permit applications shall also be sent to the Compliance Authority.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northwest District Office at 160 Governmental Center, Pensacola, Florida 32501-5794.
3. Appendices: The following Appendices are attached as part of this permit: Appendix CF (Citation Formats); Appendix GC (General Conditions); and Appendix SC (Standard Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-4, 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Construction Approval: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Rule 62-210.200(76), F.A.C. defines *construction* as, "The act of performing on-site fabrication, erection, installation or modification of an emissions unit or facility of a permanent nature, including installation of foundations or building supports; laying of underground pipe work or electrical conduit; and fabrication or installation of permanent storage structures, component parts of an emissions unit or facility, associated support equipment, or utility connections. Land clearing and other site preparation activities are not a part of the construction activities." Such permits shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions units. The permittee shall apply for a Title V operation permit (revision) at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Emissions Units 001 and 002

This section of the permit addresses the following existing emissions units:

Emissions Unit Nos. 001 & 002

Description: Unit 1 (EU-001) is a tangentially fired, dry bottom boiler that began commercial operation on May 12, 1965. Unit 2 (EU-002) is a tangentially fired, dry bottom boiler that began commercial operation on April 9, 1967.

Fuels: Coal, new No. 2 fuel oil and/or on-specification used oil (for start-up and flame stabilization), and occasional on-site generated "oil contaminated soil".

Unit 1 Capacity: 1,944.8 MMBtu/hour when firing pulverized coal, 153 MMBtu/hr when firing oil.

Unit 2 Capacity: 2,246.2 MMBtu/hour when firing pulverized coal, 76 MMBtu/hr when firing oil.

PM Controls: Hot-side and cold-side electrostatic precipitators.

NO_x Controls: Low-NO_x burners and selective non-catalytic reduction (SNCR).

Continuous Monitors: Carbon dioxide (CO₂), NO_x, sulfur dioxide (SO₂), opacity, stack gas flow, and urea injection rate.

Stack Parameters: Units 1 & 2 share a common stack that is 199 feet tall with a diameter of 18 feet. The volumetric flow rate of Units 1 & 2 combined, at permitted capacity, is approximately 1,567,967 acfm.

{Permitting Notes: Based on the current Title V air operation permit, Units 1 & 2: are regulated under Rule 62-296.405, F.A.C. (Fossil Fuel Fired Steam Generators > 250 MMBtu/Hour Heat Input); have not undergone PSD Preconstruction Review; and are regulated under Phase II of the federal Acid Rain Program (40 CFR 75).}

PREVIOUS APPLICABLE REQUIREMENTS

1. Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for these emissions units. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070, F.A.C.]

EQUIPMENT AND CONSTRUCTION

2. Selective Non-Catalytic Reduction (SNCR) System: The permittee is required to construct, tune, operate, and maintain a new HERT SNCR system for Units 1 & 2 to reduce emissions of NO_x in accordance with this permit and as described in the application, approved drawings, plans, and other documents on file with the Department. Based on the fuel used and the operating conditions recorded during the baseline testing authorized by air construction permit No. 0050014-012-AC, the designed target NO_x conversion efficiency for Unit 1 is 50% and the designed target NO_x conversion efficiency for Unit 2 is 30%. The designed target ammonia slip level is 5 ppmv based on a 24-hour average. [Design; Application No. 0050014-013-AC; and Rule 62-4.080, F.A.C.]

{Permitting Note: Advanced Combustion Technology, Inc. designed the new HERT SNCR system, which will generally consist of the following:

- **UREA Injection System:** Urea will be delivered by truck and stored on site as a 50% aqueous solution in one 45,000 gallon tank. It is expected that the tank will be maintained at about 2/3 capacity to avoid the possibility of an overflow. This will provide enough urea for about 5½ days of operation. The solution will be maintained at a temperature of approximately 90° F by circulating through the SNCR system piping loop heating module. Using plant service water or other dilution water source, the metering module dilutes the reagent to a predetermined concentration (somewhat less than 30%) and precisely controls the flow of the diluted reagent to distribution modules located near the boiler injection point. The distribution modules provide the final control of diluted reagent and atomizing/cooling (plant) air

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Emissions Units 001 and 002

being delivered to each injector. The diluted reagent is injected into the boiler via wall-mounted air atomizing lances, which will be installed in the upper levels of the boiler at locations to be determined by the manufacturer. At peak load, the urea injection rate will be about 145 gallons per hour (gph) for Unit 1 and about 135 gph for Unit 2. This translates to an ammonia flow for Unit 1 of 391 lb/hr and for Unit 2 of 364 lb/hr, on a dry basis.

- **Ammonia Slip:** The SNCR is designed and guaranteed to have a maximum ammonia slip concentration of 5 ppmvd corrected to 3% O₂ (24 hour basis) in the duct cross-sectional area for all boiler loads. There are no provisions for continuously monitoring ammonia concentration in the flue gas. When ammonia measurements in the flue gas are required, a wet chemical method or other methods approved by EPA will be utilized. Although not required, more frequent tracking of ammonia slip will be monitored by measuring the amount of residual ammonia adsorbed by the fly ash. Fly ash samples will be measured periodically using an ion-specific electrode.

3. **Updated Designs:** The permittee shall update the Department with final design specifications and any substantial changes made to the final design specifications during the actual construction phase. [Rule 62-4.070(3), F.A.C.]

EMISSIONS LIMITING STANDARDS

4. **NO_x Emissions Cap:** The combined NO_x emissions from Units 1 and 2 shall not exceed 4700 tons during any consecutive 12-month rolling total as determined by CEMS data reported to the EPA Acid Rain database (including the NO_x emissions and heat input rates). Within three working days of discovering an exceedance of the NO_x emissions cap, the permittee shall notify the Compliance Authority. [Application No. 0050014-016-AC and Rule 62-4.080, F.A.C.]
5. **Circumvention:** No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. For this project, proper operation of the air pollution control device means complying with the NO_x emissions cap. [Rule 62-210.650, F.A.C.]

EMISSIONS PERFORMANCE TESTING

6. **Nitrogen Oxides, Performance Tests:** Within 60 days after completing construction of the SNCR system and bringing Units 1 and 2 back on line, the permittee shall conduct tests to demonstrate the operational capabilities of the installed HERT SNCR system as compared to the design specification to achieve a 50% reduction in the nitrogen oxide emission rate for Unit 1 and 30% for Unit 2. The permittee shall test the SNCR outlet in accordance with EPA Method 7E as adopted by reference in Rule 62-204.800, F.A.C. Data collected from the NO_x CEMS may be used to represent NO_x emissions at the SNCR outlet. The data shall be collected for at least three consecutive hours and compared to the data collected during the baseline tests authorized by permit No. 0050014-012-AC, including a comparison of the fuel quality and operating conditions present during each of the tests. The purpose of the informational tests is to determine the actual installed control capabilities of the SNCR systems. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]
7. **Ammonia Slip, Performance Tests:** Within 60 days after completing construction of the SNCR system and bringing Units 1 and 2 back on line and upon Department request thereafter, the permittee shall conduct tests to determine the ammonia slip rate in accordance with EPA Method CTM-027 or other methods approved by EPA. If tests show ammonia slip emissions are greater than the design target level specified in Condition No. 2 of this subsection, the permittee shall take corrective actions such as repair, addition of urea injectors for better mixing, addition of mixing vanes in the duct, etc. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

{Permitting Note: EPA Methods 1 (Traverse Points), 2 (Velocity and Flow Rate), 3 (Gas Analysis), 4 (Moisture

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Emissions Units 001 and 002

Content), and 19 (Calculating Emission Rates, Use of F-Factors) may also be used to supplement the required test methods.}

CONTINUOUS MONITORING REQUIREMENTS

{Permitting Note: In accordance with the federal Acid Rain requirements, the following continuous monitors are installed on these units: SO₂, NO_x, CO₂ and stack gas flow.}

8. SNCR Urea Injection Rate Monitor: In accordance with the manufacturer's specifications, the permittee shall install, calibrate, operate and maintain a flow meter to measure and record the urea injection rate for the SNCR system. [Rules 62-4.070(3) and 62-212.400(5)(c), F.A.C.]

RECORDS AND REPORTS

9. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the provisions of Rule 62-297.310(8), F.A.C. For each required test run, the report shall indicate the actual heat input rate (MMBtu/hour), the NO_x emission rate (lb/MMBtu) as recorded by the CEMS, and the urea injection rate (lb/hour). The report shall also include copies of the continuous monitoring records for the NO_x emissions. [Rule 62-297.310(8), F.A.C.]
10. Annual NO_x Reports: In conjunction with each Annual Operating Report, the permittee shall submit an annual report summarizing the actual NO_x emissions from Units 1 and 2 as determined by the Acid Rain CEMS for each 12-month rolling total for the calendar year. The reports shall identify the date and duration of any periods when the CEMS was off line or unable to report valid data and shall describe how NO_x emissions were determined for these periods and included in the 12-month rolling total. Each report shall be submitted to the Compliance Authority in accordance with the deadline for the Annual Operating Report. The Compliance Authority may request this report at other times within the calendar year. [Rule 62-4.070(3), F.A.C.]

SECTION 4. APPENDICES

Appendix CF. Citation Formats

Appendix GC. General Conditions

Appendix SC. Standard Conditions

SECTION 4. APPENDIX CF
CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number
“001” identifies the specific permit project
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX GC
GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

SECTION 4. APPENDIX GC
GENERAL CONDITIONS

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable to project);
 - b. Determination of Prevention of Significant Deterioration (not applicable to project); and
 - c. Compliance with New Source Performance Standards (not applicable to project).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX SC
STANDARD CONDITIONS

Unless otherwise specified by permit or rule, the following conditions apply to all emissions units and activities at this facility.

EMISSIONS AND CONTROLS

1. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
2. General Visible Emissions: Unless otherwise specified in the permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. [Rule 62-296.320(4)(b)1, F.A.C.]
3. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

4. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
5. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
6. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
7. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. Required Sampling Time. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - b. Minimum Sample Volume. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.[Rule 62-297.310(4), F.A.C.]
8. Determination of Process Variables
 - a. Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process

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weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

- b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

9. **Sampling Facilities:** The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
10. **Test Notification:** The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
11. **Special Compliance Tests:** When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
12. **Test Reports:** The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
1. The type, location, and designation of the emissions unit tested.
 2. The facility at which the emissions unit is located.
 3. The owner or operator of the emissions unit.
 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 8. The date, starting time and duration of each sampling run.
 9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
 10. The number of points sampled and configuration and location of the sampling plane.
 11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
 12. The type, manufacturer and configuration of the sampling equipment used.
 13. Data related to the required calibration of the test equipment.
 14. Data on the identification, processing and weights of all filters used.
 15. Data on the types and amounts of any chemical solutions used.
 16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.

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17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

RECORDS AND REPORTS

13. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]

Livingston, Sylvia

From: Waters, G. Dwain [GDWATERS@southernco.com]
Sent: Thursday, December 25, 2008 1:36 PM
To: Livingston, Sylvia; Terry, Greg N.
Cc: Bradburn, Rick; forney.kathleen@epamail.epa.gov; Gibson, Victoria; Halpin, Mike; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: Re: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-016-AC

Gulf Power has received the Smith Final SNCR Permit #0050014-016. Thanks, Dwain Waters

Dwain Waters, QEP

From: Livingston, Sylvia
To: Waters, G. Dwain; Terry, Greg N.
Cc: Bradburn, Rick ; forney.kathleen@epamail.epa.gov ; Gibson, Victoria ; Halpin, Mike ; Koerner, Jeff ; Walker, Elizabeth (AIR)
Sent: Wed Dec 24 12:39:36 2008
Subject: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-016-AC

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". **We must receive verification that you are able to access the documents.** Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0050014.016.AC.F_pdf.zip

Owner/Company Name: GULF POWER COMPANY
Facility Name: LANSING SMITH PLANT
Project Number: 0050014-016-AC
Permit Status: FINAL
Permit Activity: CONSTRUCTION/ HERT SNCR NOX EMISSION LIMIT
Facility County: BAY
Processor: Jeff Koerner

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.