



# Florida Department of Environmental Protection

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## Memorandum

To: Jeff Koerner, DARM – Air Permitting and Compliance Section 

From: Tammy McWade, DARM – Air Permitting and Compliance Section 

Date: June 30, 2011

Subject: Draft Air Construction Permit  
Project No. 0050014-019-AC  
Gulf Power Company, Lansing Smith Plant  
OpFlex PEAK Enhancements

Attached for your review is a draft minor air construction permit package for the existing Lansing Smith Plant, which is located in Bay County at 4300 County Road in Lynne Haven, Florida. The draft permit authorizes the applicant to incorporate the General Electric OpFlex Peak Enhancement package, which is designed to expand the peak power production profile for the existing combustion turbines (EU 004 and EU 005). Under some conditions, operation in the Opflex peak mode may result in a slight increase in the hourly nitrogen oxides (NOx) mass emission rate over other peaking options. The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. The project is considered a new source review reform project, which does not trigger PSD preconstruction review. Day 90 of the permitting time clock is July 27, 2011. I recommend your approval of the attached draft permit package.

Attachments

JFK/ttm



# Florida Department of Environmental Protection

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

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

June 30, 2011

*Sent by Electronic mail – Received Receipt Requested*

Mr. James Vick, Environmental Affairs Director  
Gulf Power Company  
One Energy Place, BIN No. 0328  
Pensacola, FL 32520-0328

Re: Project No. 0050014-019-AC  
Gulf Power Company, Lansing Smith Plant  
OpFlex Peak Enhancements for Unit 3

Dear Mr. Vick:

On April 29, 2011, you submitted an application requesting to incorporate the General Electric OpFlex Peak enhancement package, which is designed to expand the operating profile while maintaining optimal emissions levels for the existing Unit 3 combined cycle combustion turbine system (EU 004 and EU 005). The existing facility is located in Bay County at 4300 County Road in Lynne Haven, Florida. Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Technical Evaluation and Preliminary Determination; and the Draft Permit with Appendices. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Tammy McWade, at 850/717-9086.

Sincerely,

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Jeffery F. Koerner, Program Administrator  
Permitting and Compliance Section  
Division of Air Resource Management

Enclosures

JFK/ttm

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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*In the Matter of an  
Application for Air Permit by:*

Gulf Power Company  
One Energy Place, BIN No. 0328  
Pensacola, FL 32520

Project No. 0050014-019-AC  
Minor Air Construction Permit  
Lansing Smith Plant, Unit 3  
OpFlex Peak Enhancements  
Bay County, Florida

*Authorized Representative:*

Mr. James Vick, Environmental Affairs Director

**Facility Location:** Gulf Power Company operates the existing Lansing Smith Plant, which is located in Bay County 4300 County Road in Lynne Haven, Florida.

**Project:** The applicant proposes to incorporate the General Electric OpFlex Peak enhancement package, which is designed to expand the operating profile while maintaining optimal emissions levels for the existing Unit 3 combined cycle combustion turbine system. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

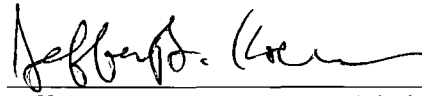
A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

Executed in Tallahassee, Florida.



Jeffery F. Koerner, Program Administrator  
Air Permitting and Compliance Section  
Division of Air Resource Management

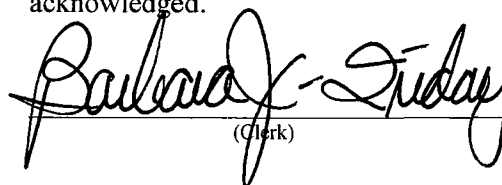
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit with Appendices) 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 6/30/11 to the persons listed below.

- Mr. James Vick, Gulf Power Company (jovick@southernco.com)
- Mr. Glenn Waters, Gulf Power Company (gdwaters@southernco.com)
- Mr. Gregory Terry, P.E., Gulf Power Company (gnterry@southernco.com)
- Mr. Rick Bradburn, DEP Southwest District Office (rick.bradburn@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@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.

 6/30/11  
(Clerk) (Date)

**P.E. CERTIFICATION STATEMENT**

**PERMITTEE**

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

Draft Permit No. 0050014-019-AC  
Lansing Smith Plant, Unit 3  
OpFlex Peak Enhancements  
Bay County, Florida

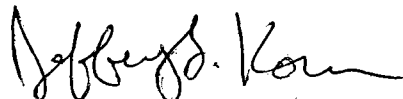
**PROJECT DESCRIPTION**

Gulf Power Company requests authorization to install the General Electric OpFlex Peak enhancement package on Unit 3, which is an existing 2-on-1 combined cycle combustion turbine system (EU-004 and EU-005). This enhancement is designed expand the peak operating profile by controlling the fuel distribution and allowing operation at a higher firing temperature. The enhancement will increase profitability by increased operational flexibility to meet peak power demands. The peak fire capability will require the installation of a Continuous Dynamics Monitoring System to ensure that combustion system parameters are kept at optimal performance.

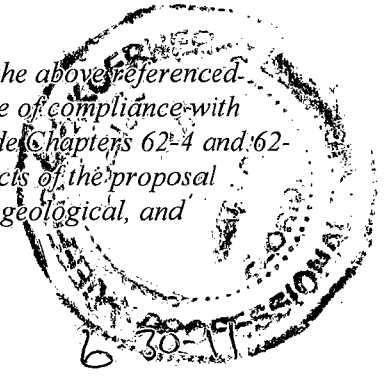
Based on vendor data and existing plant data, the project will not result in an increase the maximum hourly nitrogen oxides (NOx) emission rate; therefore, the project is not considered a modification under the New Source Performance Standards (NSPS), which would subject the project to new NOx provisions in Subpart KKKK (Standards of Performance for Combustion Turbines) in Title 40, Part 60 of the Code of Federal Regulations (40 CFR 60).

This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (F.A.C.) and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

*I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, civil, mechanical, structural, hydrological, geological, and meteorological features).*



Jeffery F. Koerner, P.E.  
Registration Number: 49441



(Date)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection  
Division of Air Resource Management, Bureau of Air Regulation

Draft Air Permit No. 0050014-019-AC  
Gulf Power Company, Lansing Smith Plant  
Bay County, Florida

**Applicant:** The applicant for this project is Gulf Power Company. The applicant's authorized representative and mailing address is: Mr. James Vick, Environmental Affairs Director, Gulf Power Company, Lansing Smith Plant, One Energy Place, BIN No. 0328, Pensacola, Florida and 32520.

**Facility Location:** Gulf Power Company operates the existing Lansing Smith Plant, which is located in Bay County 4300 County Road in Lynne Haven, Florida.

**Project:** Gulf Power Company requests authorization to install the General Electric OpFlex Peak enhancement package on Unit 3, which is an existing 2-on-1 combined cycle combustion turbine system (EU-004 and EU-005). This enhancement is designed expand the peak operating profile by controlling the fuel distribution and allowing operation at a higher firing temperature. The enhancement will increase profitability by increased operational flexibility to meet peak power demands. The peak fire capability will require the installation of a Continuous Dynamics Monitoring System to ensure that combustion system parameters are kept at optimal performance. Based on the expected emissions, the OpFlex Peak enhancement will not trigger preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality pursuant to Rule 62-212.400, Florida Administrative Code (F.A.C.).

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212, F.A.C. The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/717-9000.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site by entering draft permit number:  
<http://www.dep.state.fl.us/air/emission/apds/default.asp>.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

(Public Notice to be Published in the Newspaper)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

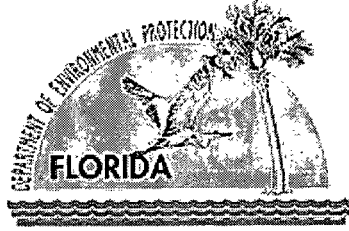
**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.





**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**APPLICANT**

Gulf Power Company  
One Energy Place  
Pensacola, FL 32520

Lansing Smith Plant  
Facility ID No. 0050014

**PROJECT**

Project No. 0050014-019-AC  
Application for Minor Source Air Construction Permit  
OpFlex PEAK Enhancement

**COUNTY**

Bay County, Florida

**PERMITTING AUTHORITY**

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

June 30, 2011

## **1. GENERAL PROJECT INFORMATION**

### **Air Pollution Regulations**

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

### **Glossary of Common Terms**

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

### **Facility Description and Location**

Lansing Smith Plant is an existing electrical generating plant, which is categorized under Standard Industrial Classification Code No. 4911. The existing facility is located in Bay County at 4300 County Road, Lynne Haven, Florida. The map coordinates are: Zone 16; 625.02 kilometers East; and 3349.24 kilometers North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS). This facility consists of the following: two coal-fired boilers (EU 001 and EU 002); two simple cycle combustion turbines driving a single electrical generator (EU 003); and two gas-fired combined cycle combustion turbine electrical generator sets each with a duct-fired heat recovery steam generators (EU 004 and EU 005). The two combined-cycle combustion turbines are Acid Rain Units. Pulverized coal is the primary fuel for the boilers. Distillate fuel oil is used to fire the simple cycle combustion turbine and as a “back-up” fuel for the boilers. Natural gas is the only fuel allowed to be fired in the two combined-cycle combustion turbines.

### **Facility Regulatory Categories**

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

### **Project Description**

On April 29, 2001, Gulf Power Company submitted a complete application requesting authorization to incorporate the General Electric (GE) OpFlex Peak enhancement package designed to expand the peak power production profile for the existing unit 3 combined cycle combustion system (EU 004 and EU 005). The enhancement controls the fuel distribution, which will broaden the operating range of the combustion turbines to increase flexibility and profitability. The peak fire function provides the ability to safely operate at a higher firing temperature while maintaining optimal emissions levels when demand for more output capacity is at a premium.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Operation in the Opflex peak mode may result in a slight increase in the hourly nitrogen oxides (NO<sub>x</sub>) mass emission rate over other peaking options. However, current plant data indicates hourly NO<sub>x</sub> emissions rates of more than 100 lb/hour. The peak fire capability requires the installation of a Continuous Dynamics Monitoring (CDM) system to ensure that the combustion system parameters are kept at optimal performance. CDM is part of GE's remote dry low-NO<sub>x</sub> (DLN) tuning service.

### 2. PSD APPLICABILITY

#### General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. An existing, new or modified facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 5 tons per year or more of lead;
- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD-major facility categories (includes fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input).

The regulated PSD pollutants include: carbon monoxide (CO); nitrogen oxides (NO<sub>x</sub>); sulfur dioxide (SO<sub>2</sub>); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM<sub>10</sub>); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H<sub>2</sub>S); total reduced sulfur (TRS) including H<sub>2</sub>S; reduced sulfur compounds including H<sub>2</sub>S; and mercury (Hg). There are additional PSD pollutants specific to municipal waste combustors and landfills.

A PSD applicability review is required for all projects at new and existing major and minor stationary sources. Once it is determined that the existing facility is, or that the new or modified facility will be, a major stationary source, the project emissions increases are then compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the PSD pollutants. If the potential emissions increase exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant. Also, note that significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 µg/m<sup>3</sup>, 24-hour average. For each significant PSD pollutant, the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be "significant" for several PSD pollutants.

#### PSD Applicability for Project

The project is located in Bay County, which is in an area that is currently in attainment with the state and federal AAQS or otherwise designated as unclassifiable. As provided in the application, the following table summarizes potential emissions and PSD applicability for the project.

Table A. Summary of the Applicant's PSD Applicability Analysis

Pollutant	Baseline Actual Emissions (TPY)	Projected Actual Emissions OpFlex (TPY)	Increased Due to Only Demand Growth (TPY)	Change in Emissions Due to OpFlex (TPY)	Significant Emissions Rate (TPY)	Subject to PSD?
CO	175.4	183.3	6.9	1.0	100	No
CO <sub>2</sub>	1,285,964	1,344,101.5	50,977.8	7,159.7	75,000	No
NO <sub>x</sub>	422.4	440.1	15.1	2.6	40	No

**TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

Pollutant	Baseline Actual Emissions (TPY)	Projected Actual Emissions OpFlex (TPY)	Increased Due to Only Demand Growth (TPY)	Change in Emissions Due to OpFlex (TPY)	Significant Emissions Rate (TPY)	Subject to PSD?
PM/PM <sub>10</sub> /PM <sub>2.5</sub>	77.2	80.6	3.0	0.4	25/15/10	No
SO <sub>2</sub>	1.2	1.2	0.0	0.0	40	No
VOC	24.6	25.7	0.9	0.2	40	No

Notes:

- “TPY” means tons per year.
- Baseline actual emissions were calculated based on the highest consecutive 2-year average reported in the annual operating report for each pollutant during 2009 and 2010.
- Projected actual emissions based on worst case heat input increases.
- The increase from the project is the difference between the projected and baseline actual emissions, minus the actual emissions due only to demand growth.

As shown in the above table, total project emissions will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review.

**3. PROJECT DETAILS**

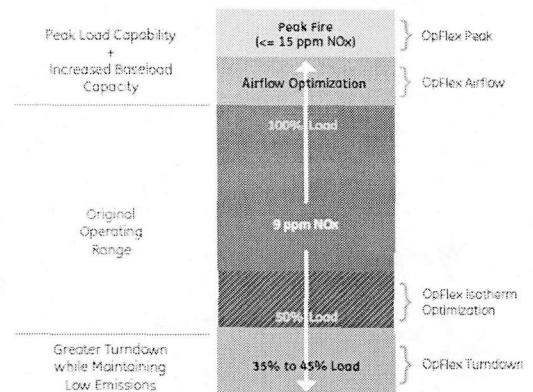
**General Electric Model No. PG7241 (FA) Combined-Cycle Combustion Turbine System (EU 004 – EU 005)**

Gulf Smith Unit 3 is an existing “2-on-1” combined-cycle combustion turbine system with the following specifications:

- The nominal generating capacity is 566 megawatts (MW), at annual average site conditions, with duct burners.
- The maximum generating capacity is approximately 574 MW in combined cycle operation with power augmentation and evaporative cooling at 95° F.
- The maximum heat input rate to the combustion turbines is a nominal 1,927 million British thermal units per hour (MMBtu/hour) based on the lower heating value (LHV) of natural gas and a compressor inlet temperature of 65° F for each combustion turbine.
- The maximum heat input to the duct burners is a nominal 303 MMBtu/hour based on the lower heating value (LHV) of natural gas.
- Emissions are controlled by DLN combustors firing exclusively natural gas.
- Gulf Smith Unit 3 may operate with steam power augmentation limited to 1,000 hours/year.

**General Electric Opflex - Operational Flexibility Enhancements for Combustion Turbines**

General Electric developed a series of enhancements that include increased output, improved peak output and reduced fuel consumption. Some of the enhancements provided by GE are OpFlex Turndown, Airflow and Peak, which are designed to expand the operating profile of the Model No. PG7241 (FA) gas turbine. The applicant proposes to integrate the OpFlex Peak enhancement. This enhancement provides an increased output of the gas turbine above the operational range by adding peak load



## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

functions. The benefits of the OpFlex enhancement include:

- Advanced fuel scheduling, a method of controlling fuel distribution;
- The ability to safely operate the turbine at a higher firing temperature while maintaining NO<sub>x</sub> at less than or equal to 15 part per million (ppm) when demand for output capacity is at a premium;
- Capable of having up to 2.5% improved peak output generation capacity;
- Improved reliability with more stable combustor operation, which may result in same or lower combustion dynamics; and
- Increased revenue potential from higher base-load and peak-load output.

The Oplex Peak enhancement requires installation of a Continuous Dynamics Monitoring system to ensure that combustion system parameters are kept at optimal performance. Monitoring combustion dynamics provides early detection of combustion instabilities and can be used to tune an engine, minimize emissions and improve engine efficiency.

#### 4. DEPARTMENT REVIEW

The applicant requests authorization to incorporate the OpFlex Peak enhancement on the existing Unit 3 combined cycle turbines with no temperature restrictions. The combustion turbines are currently allowed to operate either with duct burners or in a steam power augmentation mode limited to a maximum of 1,000 hours/year/unit. The applicant proposes to limit the total operation of the combustion turbines in the OpFlex Peak mode plus steam power augmentation mode to a combined 1,000 hours/year/unit. As provided by the application, the following table summarizes a comparison of the combustion turbines operating in OpFlex Peak mode and steam power augmentation mode at different temperatures:

Table B: Potential Emissions Comparison for One of the Combustion Turbines in Unit 3.

Pollutant	OpFlex Peak Mode <sup>c</sup>		PA Mode <sup>c</sup> @ 95 °F	Increase Over PA Mode	Emission <sup>d</sup> Limits
	@ 95 °F	@ 65 °F			
NO <sub>x</sub> (lb/hr)	77	81	79	2	113.3
CO (lb/hr)	27	29	45	-16	116.6
UHC (lb/hr)	13	14	14	0	---
PM/PM10 (lb/hr)	9	9	9	0	43

Notes:

- “PA” means steam power augmentation mode.
- “UHC” unburned hydrocarbons, which are similar to VOC emissions.
- The potential emissions are based on the vendor’s specifications when a combustion turbine is operating in OpFlex Peak mode and in steam power augmentation mode at a compressor inlet temperature of 95° F and in OpFlex Peak mode at a compressor inlet temperature of 65° F.
- The emission limits are for operation in the steam power augmentation mode.

As shown in the above table, the worst case scenario is when a combustion turbine operates in OpFlex peak mode at a compressor inlet temperature of 65° F. Based on vendor performance data, NO<sub>x</sub> emissions will increase by 2 lb/hour and CO emissions are decreased by 16 lb/hour when comparing operation in OpFlex Peak mode to steam power augmentation mode. In addition to individual emissions unit emission limits and the NO<sub>x</sub> averaging plan requirements, the facility is required to comply with a facility-wide NO<sub>x</sub> emissions cap of 6,666 TPY. The existing continuous emissions monitoring system (CEMS) will ensure compliance with all limits.

#### NSPS Provisions

Unit 3 at the Lansing Smith Plant is currently subject to the following applicable NSPS provisions in 40 CFR 60:

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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Subpart A (General Provisions), Subpart GG (Standards of Performance for Stationary Gas Turbines) and Subpart Da (Standards of Performance for Electric Utility Steam Generating Units – Duct Burners). At 65°F, the vendor indicates a maximum NOx emissions rate of 81 lb/hour (15 ppmvd @ 15% oxygen). Plant data currently indicates a maximum NOx emissions rates above 100 lb/hour. Therefore, the project is not expected to result in an increase the maximum hourly NOx emission rate and the project is not considered a modification under the New Source Performance Standards (NSPS). It will not be subject the new NOx provisions in Subpart KKKK (Standards of Performance for Combustion Turbines) in Title 40, Part 60 of the Code of Federal Regulations (40 CFR 60).

#### 4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Tammy McWade is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

# **DRAFT PERMIT**

## **PERMITTEE**

Gulf Power Company  
One Energy Place, BIN No. 0328  
Pensacola, FL 32520-0328

Authorized Representative:  
Mr. James Vick, Environmental Affairs Director

Air Permit No. 0050014-019-AC  
Permit Expires: **Date**  
Minor Air Construction Permit  
Lansing Smith Plant  
Unit 3 Combined Cycle System  
OpFlex Peak Enhancement

## **PROJECT**

This is the final air construction permit, which authorizes the permittee to upgrade the existing Unit 3 combined cycle system incorporate the General Electric OpFlex Peak enhancement package designed to expand the peak power production profile for the existing Unit 3 combined cycle combustion system (EU 004 and EU 005). The peak fire function provides the ability to safely operate at a higher firing temperature while maintaining optimal emissions levels when demand for more output capacity is at a premium. The proposed work will be conducted at the existing Lansing Smith Plant, which is a electrical generating plant categorized under Standard Industrial Classification No. 4911. The existing facility is located in Bay County at 4300 County Road in Lynne Haven, Florida. The UTM coordinates are Zone 16; 625.02 kilometers East; and 3349.24 kilometers North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

## **STATEMENT OF BASIS**

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Executed in Tallahassee, Florida  
For the Division of Air Resource Management

**(DRAFT)**

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Printed Name of Above Designee)

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with Appendices) 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 \_\_\_\_\_ (**DRAFT**) \_\_\_\_\_ to the persons listed below.

- Mr. James Vick, Gulf Power Company (jovick@southernco.com)
- Mr. Glenn Waters, Gulf Power Company (gdwaters@southernco.com)
- Mr. Gregory Terry, P.E., Gulf Power Company (gnterry@southernco.com)
- Mr. Rick Bradburn, Southwest District (rick.bradburn@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@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.

**DRAFT**

\_\_\_\_\_  
(Clerk)

\_\_\_\_\_  
(Date)



**SECTION 1. GENERAL INFORMATION (DRAFT)**

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**FACILITY AND PROJECT DESCRIPTION**

The Lansing Smith Plant is an existing electrical generating plant, which is located in Bay County at 4300 County Road in Lynne Haven, Florida. This facility consists of the following: two pulverized coal-fired boilers (EU 001 and EU 002); two simple cycle combustion turbines driving a single electrical generator (EU 003); and a 2-on-1 combined cycle combustion turbine system with duct-fired heat recovery steam generators and a single steam-electrical generator set (EU 004 and EU 005). Distillate fuel oil is used to fire the simple cycle combustion turbine and as a "backup" fuel for the boilers. Natural gas is the only fuel allowed to be fired in the combined cycle combustion turbines. The two combined-cycle combustion turbines are Acid Rain Units. The following units are affected by this air construction permit.

EU No.	Emission Unit Description
004	Combined Cycle combustion Turbine and Generator Set
005	Combined Cycle combustion Turbine and Generator Set

For this project, the permittee proposes to incorporate the General Electric OpFlex Peak enhancement package designed to expand the peak power production profile for the existing Unit 3 combined cycle combustion system (EU 004 and EU 005). The enhancement controls the fuel distribution, which will broaden the operating range of the combustion turbines to increase flexibility and profitability. The peak fire function provides the ability to safely operate at a higher firing temperature while maintaining optimal emissions levels when demand for more output capacity is at a premium. The peak fire capability requires the installation of a Continuous Dynamics Monitoring (CDM) system to ensure that the combustion system parameters are kept at optimal performance. CDM is part of the remote dry low-NO<sub>x</sub> (DLN) tuning service provided by General Electric.

**FACILITY REGULATORY CLASSIFICATION**

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The permitting authority for this project is the Bureau of Air Regulation, Division of Air Resource Management, Florida Department of Environmental Protection (Department). The Bureau of Air Regulation's mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate an emissions unit shall be submitted to the Departments Northwest District Office at 160 Governmental Center, Pensacola, Florida 32501-5794.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Departments Northwest District Office at 160 Governmental Center, Pensacola, Florida 32501-5794.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified 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. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
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. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Source Obligation:
  - (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
  - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.  
[Rule 62-212.400(12), F.A.C.]
8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit 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. The

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

9. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.
- a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
  - b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
    - 1) The name, address and telephone number of the owner or operator of the major stationary source;
    - 2) The annual emissions calculations pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
    - 3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
    - 4) Any other information that the owner or operator wishes to include in the report.
  - c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

For this project, the permit requires the annual reporting of actual NO<sub>x</sub> emissions for the following units: EU 004 and EU 005 Combined Cycle Combustion Turbine and Generator Sets.

[Application 0050014-019-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. Unit 3 Combined Cycle Combustion Turbine System (EU-004 and EU-005)

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
004	Combined Cycle Combustion Turbine and Generator Set
005	Combined Cycle Combustion Turbine and Generator Set

*{Permitting Note: The combustion turbines were originally constructed under Permit No. 0050014-002-AC, which required PSD preconstruction review for carbon monoxide (CO), Sulfur dioxide (SO<sub>2</sub>)/sulfuric acid mist (SAM) and volatile organic compounds (VOC) emissions, avoided PSD preconstruction review for NO<sub>x</sub>.}*

#### 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

2. OpFlex Peak Enhancement: The permittee is authorized to install the General Electric OpFlex Peak enhancement package on the existing Unit 3 combined-cycle combustion turbines. This includes installation of a Continuous Dynamics Monitoring (CDM) system to ensure that the combustion system parameters are kept at optimal performance. CDM is part of General Electric's remote dry low-NO<sub>x</sub> (DLN) tuning service. [Application No. 0050014-019-AC]

#### PERFORMANCE RESTRICTIONS

3. Hours of Operation: Combined operation in steam power augmentation mode plus OpFlex Peak mode shall not exceed a total of 1,000 hours per year per unit. [Rule 62-210.200 (Definitions-Potential Emissions), F.A.C. and Application No. 0050014-019-AC]

#### EMISSIONS STANDARDS

4. Emissions Standards: Emissions from each combustion turbine shall not exceed the emissions standards specified in the below table.

Operating Mode	NO <sub>x</sub> <sup>b</sup>	CO <sup>a, c</sup>	SO <sub>2</sub> /SAM <sup>a, d</sup>	Visible Emissions <sup>e</sup>
OpFlex Peaking <sup>a</sup>	113.3 lb/hour	23ppmvd @ 15% O <sub>2</sub>	2 grains per 100 scf of natural gas	10% opacity

- a. "lb" means pound. "ppmvd" means parts per million by volume, dry". "O<sub>2</sub>" refers to the flue gas oxygen content. The Opflex peaking mode will be used to displace some of the steam power augmentation mode and is subject to the same emissions standards and initial Best Available Control Technology (BACT) determinations.
- b. Emissions of NO<sub>x</sub> in the stack exhaust gas with the combustion turbine operating in the Opflex peaking mode with or without duct firing shall not exceed 113.3 lb/hour based on a 30-day rolling average of data collected by the continuous emissions monitor system (CEMS) and prorated daily as necessary based upon hours of operation per operating mode.
- c. Compliance with the CO emissions standard shall be demonstrated by stack testing accordance with Method 10, promulgated by the Environmental Protection Agency (EPA). *{Permitting Note: For informational purposes, the CO limit equates to 116.6 lb/hour. Compliance with the CO limit also provides reasonable assurance that VOC emissions are very low (<6 ppmvd @ 15% O<sub>2</sub>).}*

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. Unit 3 Combined Cycle Combustion Turbine System (EU-004 and EU-005)

- d. Emissions of SO<sub>2</sub> and SAM shall be minimized by the firing of natural gas meeting this fuel sulfur specification. Compliance with this requirement may be demonstrated with data collected from the natural gas pipeline transmission company in conjunction with the current NSPS Custom Fuel Monitoring Schedule specified in the Title V air operation permit.
- e. Compliance with the visible emissions standard shall be determined by EPA Method 9.

*{Permitting Note: Compliance with the emissions standards specified in the original air construction permit provides reasonable assurance that the project avoids PSD preconstruction review.}* [Application No. 0050014-019-AC; and 62-212.400(12), F.A.C.]

#### TESTING REQUIREMENTS

- 5. **Initial Compliance Tests:** Each combustion turbine shall be tested to demonstrate initial compliance with the emissions standards for CO and opacity while operating in the OpFlex peaking mode. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. [Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]
- 6. **Compliance Tests Prior to Renewal:** Prior to renewal of the Title V air operation permit, each combustion turbine shall be tested to demonstrate compliance with the emissions standards for CO and opacity while operating in the OpFlex peaking mode. [Rule 62-297.310(7)(a)4, F.A.C.]
- 7. **Test Requirements:** The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]
- 8. **Test Methods:** Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
7, 7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources <i>{Note: The method shall be based on a continuous sampling train.}</i>
18	Measurement of Gaseous Organic Compound Emissions by Gas Chromatography <i>{Note: This optional method may be used to deduct non-regulated VOC emissions such as methane from the total measured VOC.}</i>
20	Determination of Nitrogen Oxides, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60; Application Nos. 0050014-002-AC and 0050014-019-AC]

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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### A. Unit 3 Combined Cycle Combustion Turbine System (EU-004 and EU-005)

#### MONITORING AND RECORD KEEPING REQUIREMENTS

9. Operational Records: To demonstrate compliance with the operational restriction on hours, the permittee shall maintain records of the hours of operation of each combustion turbine when operating in OpFlex Peaking mode and steam power augmentation mode. [Rule 62-4.070(3), F.A.C.]
10. NOx CEMS: Continuous compliance with the NOx emissions standard shall be demonstrated by data collected from the existing CEMS. [Rule 62-4.070(3), F.A.C.]
11. Fuel Sulfur Monitoring: To demonstrate compliance with the fuel sulfur limit, the permittee shall monitor the sulfur content of natural gas with data collected from the natural gas pipeline transmission company consistent with the current NSPS Custom Fuel Monitoring Schedule specified in the Title V air operation permit. [Rules 62-4.070(3), F.A.C. and NSPS Subpart GG in 40 CFR 60.]

## SECTION 4. APPENDICES (DRAFT)

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### Contents

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

Appendix D. Common Testing Requirements

**CITATION FORMATS**

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

**Old Permit Numbers**

Example: Permit No. AC50-123456 or 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 for that county  
“001” identifies the specific permit project number  
“AC” identifies the permit as an air construction permit  
“AF” identifies the permit as a minor source federally enforceable state operation permit  
“AO” identifies the permit as a minor source air operation permit  
“AV” identifies the permit as a major Title V air operation permit

**PSD Permit Numbers**

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of 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 number

**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

**GLOSSARY OF COMMON TERMS**

- |  |   |
|--|---|
| ° F: degrees Fahrenheit  | <b>BACT:</b> best available control technology      |
| µg: microgram  | <b>bhp:</b> brake horsepower                        |
| <b>AAQS:</b> Ambient Air Quality Standard                              | <b>Btu:</b> British thermal units                   |
| <b>acf:</b> actual cubic feet  | <b>CAM:</b> compliance assurance monitoring         |
| <b>acfm:</b> actual cubic feet per minute                              | <b>CEMS:</b> continuous emissions monitoring system |
| <b>ARMS:</b> Air Resource Management System<br>(Department’s database) | <b>cfm:</b> cubic feet per minute                   |
|  | <b>CFR:</b> Code of Federal Regulations             |



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**SECTION 4. APPENDIX A (DRAFT)****Citation Formats and Glossary of Common Terms**

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<b>CAA:</b> Clean Air Act	<b>NESHAP:</b> National Emissions Standards for Hazardous Air Pollutants
<b>CMS:</b> continuous monitoring system	<b>NO<sub>x</sub>:</b> nitrogen oxides
<b>CO:</b> carbon monoxide	<b>NSPS:</b> New Source Performance Standards
<b>CO<sub>2</sub>:</b> carbon dioxide	<b>O&amp;M:</b> operation and maintenance
<b>COMS:</b> continuous opacity monitoring system	<b>O<sub>2</sub>:</b> oxygen
<b>DARM:</b> Division of Air Resource Management	<b>Pb:</b> lead
<b>DEP:</b> Department of Environmental Protection	<b>PM:</b> particulate matter
<b>Department:</b> Department of Environmental Protection	<b>PM<sub>10</sub>:</b> particulate matter with a mean aerodynamic diameter of 10 microns or less
<b>dscf:</b> dry standard cubic feet	<b>ppm:</b> parts per million
<b>dscfm:</b> dry standard cubic feet per minute	<b>ppmv:</b> parts per million by volume
<b>EPA:</b> Environmental Protection Agency	<b>ppmvd:</b> parts per million by volume, dry basis
<b>ESP:</b> electrostatic precipitator (control system for reducing particulate matter)	<b>QA:</b> quality assurance
<b>EU:</b> emissions unit	<b>QC:</b> quality control
<b>F:</b> fluoride	<b>PSD:</b> prevention of significant deterioration
<b>F.A.C.:</b> Florida Administrative Code	<b>psi:</b> pounds per square inch
<b>F.A.W.:</b> Florida Administrative Weekly	<b>PTE:</b> potential to emit
<b>F.D.:</b> forced draft	<b>RACT:</b> reasonably available control technology
<b>F.S.:</b> Florida Statutes	<b>RATA:</b> relative accuracy test audit
<b>FGD:</b> flue gas desulfurization	<b>RBLC:</b> EPA's RACT/BACT/LAER Clearinghouse
<b>FGR:</b> flue gas recirculation	<b>SAM:</b> sulfuric acid mist
<b>ft<sup>2</sup>:</b> square feet	<b>scf:</b> standard cubic feet
<b>ft<sup>3</sup>:</b> cubic feet	<b>scfm:</b> standard cubic feet per minute
<b>gpm:</b> gallons per minute	<b>SIC:</b> standard industrial classification code
<b>gr:</b> grains	<b>SIP:</b> State Implementation Plan
<b>HAP:</b> hazardous air pollutant	<b>SNCR:</b> selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
<b>Hg:</b> mercury	<b>SO<sub>2</sub>:</b> sulfur dioxide
<b>I.D.:</b> induced draft	<b>TPD:</b> tons/day
<b>ID:</b> identification	<b>TPH:</b> tons per hour
<b>kPa:</b> kilopascals	<b>TPY:</b> tons per year
<b>lb:</b> pound	<b>TRS:</b> total reduced sulfur
<b>MACT:</b> maximum achievable technology	<b>UTM:</b> Universal Transverse Mercator coordinate system
<b>MMBtu:</b> million British thermal units	<b>VE:</b> visible emissions
<b>MSDS:</b> material safety data sheets	<b>VOC:</b> volatile organic compounds
<b>MW:</b> megawatt	

## 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 403.141, 403.727, or 403.859 through 403.861, F.S. 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 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any 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 of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and 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 and 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 reasonable times, access to the premises where the permitted activity is located or conducted to:
  - a. Have access to and copy any records that must be kept under 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 noncompliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time then noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with 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 (NSPS Subpart GG).
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 for 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:
    - (a) The date, exact place, and time of sampling or measurements;
    - (b) The person responsible for performing the sampling or measurements;
    - (c) The dates analyses were performed;
    - (d) The person responsible for performing the analyses;
    - (e) The analytical techniques or methods used;
    - (f) 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.

## Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility

**EMISSIONS AND CONTROLS**

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 624.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **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(Definitions), F.A.C.]
8. **General Visible Emissions:** 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% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **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.]

**RECORDS AND REPORTS**

10. **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 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
11. **Emissions Computation and Reporting:**
  - a. **Applicability.** This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance

**SECTION 4. APPENDIX C (DRAFT)**

**Common Conditions**

with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]

- b. *Computation of Emissions.* For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
- (1) **Basic Approach.** The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
- (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
- (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C. but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (2) **Continuous Emissions Monitoring System (CEMS).**
- (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
- 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
- 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
- (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
- 1) A calibrated flow meter that records data on a continuous basis, if available; or
- 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (c) The owner or operator may use CEMS data in combination with an appropriate ffactor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- (3) **Mass Balance Calculations.**
- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
- 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and

## Common Conditions

- 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
  - (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
  - (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- (4) Emission Factors.
- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
    - 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
    - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
    - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
  - b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- (7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

## Common Conditions

[Rule 62-210.370(2), F.A.C.]

c. *Annual Operating Report for Air Pollutant Emitting Facility*

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
  - a. All Title V sources.
  - b. All synthetic non-Title V sources.
  - c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
  - d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.
- (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.
- (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
- (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

**SECTION 4. APPENDIX D (DRAFT)**

**Common Testing Requirements**

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units that require testing.

**COMPLIANCE TESTING REQUIREMENTS**

1. **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.]
2. **Operating Rate During Testing:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. 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. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. [Rule 62-297.310(2), F.A.C.]
3. **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.]
4. **Applicable Test Procedures:**
  - a. **Required Sampling Time.**
    - (1) 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.
    - (2) **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
      - (a) For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
      - (b) The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
      - (c) The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
  - 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.



**SECTION 4. APPENDIX D (DRAFT)**

**Common Testing Requirements**

- 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.
- d. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.
- e. Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

TABLE 297.310-1 CALIBRATION SCHEDULE			
ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calibration liquid in glass	5° F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5° F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/- 0.001" mean of at least three readings; Max. deviation between readings, 0.004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, when 5% change observed, annually	Spirometer or calibrated wet test or dry gas test meter	2%
	2. One Point: Semiannually		
	3. Check after each test series	Comparison check	5%

[Rule 62-297.310(4), F.A.C.]

**5. 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 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.]

Common Testing Requirements

6. 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. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must also comply with all applicable Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.
- a. Permanent Test Facilities. The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.
  - b. Temporary Test Facilities. The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.
  - c. Sampling Ports.
    - (1) All sampling ports shall have a minimum inside diameter of 3 inches.
    - (2) The ports shall be capable of being sealed when not in use.
    - (3) The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
    - (4) For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.
    - (5) On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.
  - d. Work Platforms.
    - (1) Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.
    - (2) On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.
    - (3) On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.
    - (4) All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toe board, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.
  - e. Access to Work Platform.
    - (1) Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.
    - (2) Walkways over free-fall areas shall be equipped with safety rails and toe boards.
  - f. Electrical Power.

## Common Testing Requirements

- (1) A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.
- (2) If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

## g. Sampling Equipment Support.

- (1) A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.
  - (a) The bracket shall be a standard 3 inch × 3 inch × one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.
  - (b) A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.
  - (c) The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.
- (2) A complete monorail or dual rail arrangement may be substituted for the eyebolt and bracket.
- (3) When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

7. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

## a. General Compliance Testing.

1. The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit.
2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to sub-subparagraph 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
  - (a) Did not operate; or
  - (b) In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours,
4. During each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

**SECTION 4. APPENDIX D (DRAFT)**

**Common Testing Requirements**

- (a) Visible emissions, if there is an applicable standard;
  - (b) Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
  - (c) c. Each NESHAP pollutant, if there is an applicable emission standard.
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.
  6. For fossil fuel steam generators on a semi-annual particulate matter emission compliance testing schedule, a compliance test shall not be required for any six-month period in which liquid and/or solid fuel is not burned for more than 200 hours other than during startup.
  7. For emissions units electing to conduct particulate matter emission compliance testing quarterly pursuant to paragraph 62-296.405(2)(a), F.A.C., a compliance test shall not be required for any quarter in which liquid and/or solid fuel is not burned for more than 100 hours other than during startup.
  8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
  9. 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.
  10. An annual compliance test conducted for visible emissions shall not be required for units exempted from air permitting pursuant to subsection 62-210.300(3), F.A.C.; units determined to be insignificant pursuant to subparagraph 62-213.300(2)(a)1., F.A.C., or paragraph 62-213.430(6)(b), F.A.C.; or units permitted under the General Permit provisions in paragraph 62-210.300(4)(a) or Rule 62-213.300, F.A.C., unless the general permit specifically requires such testing.
    - (a) 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.
    - (b) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of paragraph 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.]

**REPORTS**

**8. Test Reports:**

- a. 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.
- b. 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.

## Common Testing Requirements

- c. 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.
  - (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.]

**MISCELLANEOUS**

9. Stack and Duct: The terms stack and duct are used interchangeably in this rule. [Rule 62-297.310(9), F.A.C.]

**Friday, Barbara**

---

**To:** Vick, James O.  
**Cc:** gdwaters@southernco.com; gnterry@southernco.com; Bradburn, Rick; Kathleen Forney; abrams.heather@epamail.epa.gov; Ana Oquendo; Gibson, Victoria; McWade, Tammy  
**Subject:** GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC  
**Attachments:** Draft0050014-019-ACSignedWrittenNotice.pdf

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air 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".

*Note: 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).*

Attention: Tammy McWade

Owner/Company Name: GULF POWER COMPANY  
Facility Name: LANSING SMITH PLANT  
Project Number: 0050014-019-AC  
Permit Status: DRAFT  
Permit Activity: CONSTRUCTION  
Facility County: BAY

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

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0050014.019.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0050014.019.AC.D_pdf.zip)

“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://approd.dep.state.fl.us/air/emission/apds/default.asp>.”

Permit project documents that 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.

Barbara Friday  
Permitting and Compliance Section  
Division of Air Resource Management (DARM)  
(850)717-9095

**Friday, Barbara**

---

**From:** Microsoft Exchange  
**To:** 'Vick, James O.'; 'gdwaters@southernco.com'; 'gnterry@southernco.com'  
**Sent:** Thursday, June 30, 2011 1:27 PM  
**Subject:** Relayed: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

**Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:**

'Vick, James O.'

'gdwaters@southernco.com'

'gnterry@southernco.com'

Subject: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

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Sent by Microsoft Exchange Server 2007

## Friday, Barbara

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**From:** Vick, James O. [JOVICK@southernco.com]  
**To:** Friday, Barbara  
**Sent:** Thursday, June 30, 2011 2:28 PM  
**Subject:** Read: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

Your message was read on Thursday, June 30, 2011 2:27:44 PM (GMT-05:00) Eastern Time (US & Canada).



## Friday, Barbara

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**From:** Vick, James O. [JOVICK@southernco.com]  
**Sent:** Thursday, June 30, 2011 3:02 PM  
**To:** Friday, Barbara  
**Subject:** RE: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

We are in receipt.

*Jim Vick  
Director Environmental Affairs  
8-420-6311  
850-444-6311  
Cell: 850-982-6204  
Have a great day.*

---

**From:** Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]  
**Sent:** Thursday, June 30, 2011 12:27 PM  
**To:** Vick, James O.  
**Cc:** Waters, G. Dwain; Terry, Greg N.; Bradburn, Rick; 'Kathleen Forney'; [abrams.heather@epamail.epa.gov](mailto:abrams.heather@epamail.epa.gov); Ana Oquendo; Gibson, Victoria; McWade, Tammy  
**Subject:** GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

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Attention: Tammy McWade

Owner/Company Name: GULF POWER COMPANY  
Facility Name: LANSING SMITH PLANT  
Project Number: 0050014-019-AC  
Permit Status: DRAFT  
Permit Activity: CONSTRUCTION  
Facility County: BAY

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

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0050014.019.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0050014.019.AC.D_pdf.zip)

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---

Barbara Friday  
Permitting and Compliance Section  
Division of Air Resource Management (DARM)  
(850)717-9095

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

## Friday, Barbara

---

**From:** Waters, G. Dwain [GDWATERS@southernco.com]  
**To:** Friday, Barbara  
**Sent:** Thursday, June 30, 2011 2:22 PM  
**Subject:** Read: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

Your message was read on Thursday, June 30, 2011 2:22:24 PM (GMT-05:00) Eastern Time (US & Canada).

## Friday, Barbara

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**From:** Waters, G. Dwain [GDWATERS@southernco.com]  
**Sent:** Thursday, June 30, 2011 2:26 PM  
**To:** Friday, Barbara; Vick, James O.  
**Cc:** Terry, Greg N.; Bradburn, Rick; Gibson, Victoria; McWade, Tammy  
**Subject:** RE: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

Gulf Power has received the draft Lansing Smith Permit 0050014-019-AC.  
Thanks, Dwain Waters

G. Dwain Waters, Q.E.P.  
Special Projects and Environmental Assets Coordinator  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0328  
Phone: (850) 444-6527  
Cell: (850) 336-6527  
Fax: (850) 444-6080  
[gdwaters@southernco.com](mailto:gdwaters@southernco.com)

---

**From:** Friday, Barbara [<mailto:Barbara.Friday@dep.state.fl.us>]  
**Sent:** Thursday, June 30, 2011 12:27 PM  
**To:** Vick, James O.  
**Cc:** Waters, G. Dwain; Terry, Greg N.; Bradburn, Rick; 'Kathleen Forney'; [abrams.heather@epamail.epa.gov](mailto:abrams.heather@epamail.epa.gov); Ana Oquendo; Gibson, Victoria; McWade, Tammy  
**Subject:** GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

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Attention: Tammy McWade

Owner/Company Name: GULF POWER COMPANY  
Facility Name: LANSING SMITH PLANT  
Project Number: 0050014-019-AC  
Permit Status: DRAFT  
Permit Activity: CONSTRUCTION  
Facility County: BAY

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0050014.019.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0050014.019.AC.D_pdf.zip)

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Barbara Friday  
Permitting and Compliance Section  
Division of Air Resource Management (DARM)  
(850)717-9095

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## Friday, Barbara

---

**From:** Terry, Greg N. [GNTERRY@southernco.com]  
**To:** Friday, Barbara  
**Sent:** Thursday, June 30, 2011 3:32 PM  
**Subject:** Read: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

Your message was read on Thursday, June 30, 2011 3:32:08 PM (GMT-05:00) Eastern Time (US & Canada).

**Friday, Barbara**

---

**From:** Microsoft Exchange  
**To:** Bradburn, Rick; Gibson, Victoria  
**Sent:** Thursday, June 30, 2011 1:27 PM  
**Subject:** Delivered: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

**Your message has been delivered to the following recipients:**

Bradburn, Rick

Gibson, Victoria

Subject: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

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Sent by Microsoft Exchange Server 2007

## Friday, Barbara

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**From:** Bradburn, Rick  
**To:** Friday, Barbara  
**Sent:** Thursday, June 30, 2011 1:30 PM  
**Subject:** Read: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

Your message was read on Thursday, June 30, 2011 1:29:57 PM (GMT-05:00) Eastern Time (US & Canada).



## Friday, Barbara

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**From:** Gibson, Victoria  
**To:** Friday, Barbara  
**Sent:** Friday, July 01, 2011 7:37 AM  
**Subject:** Read: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

Your message was read on Friday, July 01, 2011 7:36:34 AM (GMT-05:00) Eastern Time (US & Canada).

**Friday, Barbara**

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**From:** Microsoft Exchange  
**To:** McWade, Tammy  
**Sent:** Thursday, June 30, 2011 1:27 PM  
**Subject:** Delivered: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

**Your message has been delivered to the following recipients:**

McWade, Tammy

Subject: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

---

Sent by Microsoft Exchange Server 2007

## Friday, Barbara

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**From:** McWade, Tammy  
**To:** Friday, Barbara  
**Sent:** Thursday, June 30, 2011 2:17 PM  
**Subject:** Read: GULF POWER COMPANY - LANSING SMITH PLANT; 0050014-019-AC

Your message was read on Thursday, June 30, 2011 2:17:13 PM (GMT-05:00) Eastern Time (US & Canada).