

One Energy Place  
Pensacola, Florida 32520

850.444.6111

RECEIVED

JUL 27 1999

BUREAU OF AIR REGULATION

Certified Mail



July 19, 1999

Mr. Scott M. Sheplak, P.E.  
Department of Environmental Protection  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Dear Mr. Sheplak:

RE: Revised Title IV Phase I NOx Compliance Plan  
Plant Crist: 0330045-001-AV (ORIS Code: 641)  
Plant Scholz: 0630014-001-AV (ORIS Code: 642 )

Attached, please find Gulf Power's revised Phase I NOx Compliance Plan for 1999. This plan was submitted to EPA on June 28, 1999 and once processed by EPA will become effective as our NOx Averaging Compliance Plan for 1999. The plan includes coal fired units located in Florida for Plant Crist Units 4,5,6 & 7 (ORIS Code 641) and Plant Scholz Units 1 & 2 (ORIS Code 642). ***This revised submission changes Gulf Power's Phase I compliance plan from a Gulf-Mississippi Power NOx averaging plan to a Southern Company System NOx Averaging Plan.*** However, none of the previously submitted ACEL's from the individual plans have changed. They (the individual plans for Gulf-Mississippi, Alabama, Georgia-Savannah) were combined to give a greater margin of compliance.

If you have any questions or need further information regarding the Southern Company Title IV Phase I Compliance and Averaging Plan, please call me at (850) 444.6527.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Dwain Waters Q.E.P." with a stylized flourish at the end.

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

Page 2

Mr. Scott Sheplak

July 19, 1999

cc: Robert G. Moore, Gulf Power Company  
James O Vick, Gulf Power Company  
Joe Martin, Gulf Power Company  
John Dominey, Gulf Power Company  
Kim Flowers Gulf Power Company  
Ken Peacock, Gulf Power Company  
Danny Herrin, Southern Company Services

**Southern Company Services, Inc.**

Post Office Box 2641

Birmingham, Alabama 35291-8195

Tel 205.257.1000

June 28, 1999



*Energy to Serve Your World™*

Mr. Doug Neeley  
U. S. Environmental Protection Agency  
Region 4  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303 - 8960

Dear Mr. Neeley:

Please find enclosed for your review and approval a revised Southern Company Phase I NO<sub>x</sub> Averaging Plan for 1999. This revision has been discussed with Ms. Jenny Jachim in your office and Mr. Robert Miller at EPA Headquarters in Washington, D.C.

The revised NO<sub>x</sub> averaging plan includes all Phase I Southern Company units and is designed to replace the three current, separate plans for Alabama Power Company, Georgia Power Company/Savannah Electric and Power Company, and Gulf Power Company/Mississippi Power Company. The numbers in this plan are the same numbers that appear in the three separate plans. No changes in operation are anticipated or planned because of this revised averaging plan.

If you have questions or need additional information about this plan, please contact me at (205) 257-6468.

Sincerely,

W. Danny Herrin

Enclosure:

cc: Mr. Robert Miller	- EPA Headquarters
Mr. Anthony Marino	- Alabama Power Company
Mr. Phil Glisson,	- Georgia Power Company
Mr. Dwain Waters	- Gulf Power Company
Mr. Pat Hedden	- Mississippi Power Company
Mr. Lamar Keller	- Savannah Electric and Power Company



# NO<sub>x</sub> Averaging Plan

For more information, see instructions and refer to 40 CFR 76.11

This submission is:  New  Revised

Page 1 of 8

## STEP 1

Identify the units participating in this averaging plan by plant name, State, and boiler ID# from NADB. In column (a), fill in each unit's applicable emission limitation from 40 CFR 76.5, 76.6, or 76.7. In column (b), assign an alternative contemporaneous annual emissions limitation in lb/mmBtu to each unit. In column (c), assign an annual heat input limitation in mmBtu to each unit. Continue on page 3 if necessary

Plant Name	State	ID#	(a) Emission Limitation	(b) Alt. Contemp. Emission Limitation	(c) Annual Heat Input Limit
See pages 7 & 8					

## STEP 2

Use the formula to enter the Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan and the Btu-weighted annual average emission rate for the same units if they are operated in compliance with 40 CFR 76.5, 76.6, or 76.7. The former must be less than or equal to the latter

Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan

0.46

≤

0.46

≤

$$\frac{\sum_{i=1}^n (R_{Li} \times HI_i)}{\sum_{i=1}^n HI_i} \leq \frac{\sum_{i=1}^n [R_{Hi} \times HI_i]}{\sum_{i=1}^n HI_i}$$

Where,

$R_{Li}$  = Alternative contemporaneous annual emission limitation for unit i, in lb/mmBtu, as specified in column (b) of Step 1;

$R_{Hi}$  = Applicable emission limitation for unit i, in lb/mmBtu, as specified in column (a) of Step 1;

$HI_i$  = Annual heat input for unit i, in mmBtu, as specified in column (c) of Step 1;

$n$  = Number of units in the averaging plan



Southern Company Averaging Plan  
Participating Plants  
Plant Name (from Step 1)

**STEP 3**  
Mark one of the two options and enter dates

This plan is effective for calendar year 1999 through calendar year

unless notification to terminate the plan is given.

Treat this plan as identical plans, each effective for one calendar year for the following calendar years: and

unless notification to terminate one or more of these plans is given.

**STEP 4**  
Read the special provisions and certification, enter the name of the designated representative, and sign and date

**Special Provisions**

Emission Limitations

Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitations for NOx under the plan only if the following requirements are met:

- (i) For all units, the unit's actual annual average emission rate for the calendar year, in lbs/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and
  - (a) For units with alternative contemporaneous emission limitations less stringent than the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7 of 40 CFR Part 76, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,
  - (b) For units with alternative contemporaneous emission limitations more stringent than the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7 of 40 CFR Part 76, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, and
- (ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with the equation at 40 CFR 76.11(d)(1)(ii), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7.

Termination

The designated representative may submit a notification to terminate an approved averaging plan in accordance with 40 CFR 72.40(d) of 40 CFR Part 72, no later than October 1 of the calendar year for which the plan is to be terminated.

**Certification**

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Earl B. Parsons, Jr.  
Signature *Earl B. Parsons Jr.* Date 6/22/99

**STEP 3**  
Mark one of the two options and enter dates

This plan is effective for calendar year 1999 through calendar year [ ] unless notification to terminate the plan is given.

Treat this plan as [ ] identical plans, each effective for one calendar year for the following calendar years: [ ], [ ], [ ], [ ] and [ ] unless notification to terminate one or more of these plans is given.

**STEP 4**  
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**Special Provisions**

Emission Limitations

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- (i) For all units, the unit's actual annual average emission rate for the calendar year, in lbs/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and
  - (a) For units with alternative contemporaneous emission limitations less stringent than the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7 of 40 CFR Part 76, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,
  - (b) For units with alternative contemporaneous emission limitations more stringent than the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7 of 40 CFR Part 76, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, and
- (ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with the equation at 40 CFR 76.11(d)(1)(ii), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7.

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Name R. H. Haubein, Jr.	
Signature <i>R. H. Haubein, Jr.</i>	Date 6/22/99

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**Special Provisions**

Emission Limitations

Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitations for NOx under the plan only if the following requirements are met:

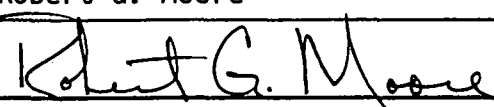
- (i) For all units, the unit's actual annual average emission rate for the calendar year, in lbs/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and
  - (a) For units with alternative contemporaneous emission limitations less stringent than the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7 of 40 CFR Part 76, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,
  - (b) For units with alternative contemporaneous emission limitations more stringent than the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7 of 40 CFR Part 76, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, and
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Name	Robert G. Moore	
Signature		Date 6/22/99

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  - (b) For units with alternative contemporaneous emission limitations more stringent than the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7 of 40 CFR Part 76, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, and
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Name Andrew J. Dearman, III	
Signature <i>Andrew J. Dearman III</i>	Date 6/22/99



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Name Lamar O. Keller	
Signature <i>Lamar O. Keller</i>	Date 4/23/99

**Southern Company Averaging Plan Participating Plants**

Plant Name (from Step 1) as Listed in Step 1.

**NO<sub>x</sub> Averaging - Page 7**

**STEP 1**  
Continue the  
identification of  
units from Step 1,  
page 1, here.

Plant Name	State	ID #	(a)	(b)	(c)
			Emission Limitation	Alt. Contemp. Emission Limitation	Annual Heat Input Limit
Arkwright	GA	1	0.45	1.00	652,199
Arkwright	GA	2	0.45	1.00	652,199
Arkwright	GA	3	0.50	1.00	652,199
Arkwright	GA	4	0.50	1.00	652,199
Bowen	GA	1	0.45	0.44	42,974,115
Bowen	GA	2	0.45	0.44	39,890,926
Bowen	GA	3	0.45	0.44	59,808,558
Bowen	GA	4	0.45	0.44	56,547,329
Branch	GA	2	0.50	0.80	13,635,168
Crist	FL	4	0.45	0.59	4,330,920
Crist	FL	5	0.45	0.59	3,518,988
Crist	FL	6	0.50	0.59	13,451,097
Crist	FL	7	0.50	0.59	20,422,854
Daniel	MS	1	0.45	0.30	21,244,417
Daniel	MS	2	0.45	0.30	29,987,051
Gadsden	AL	1	0.45	0.67	3,412,000
Gadsden	AL	2	0.45	0.67	2,160,000
Gaston	AL	1	0.50	0.45	13,871,000
Gaston	AL	2	0.50	0.45	15,349,000
Gaston	AL	3	0.50	0.45	13,799,000
Gaston	AL	4	0.50	0.45	13,796,000
Gaston	AL	5	0.45	0.48	46,496,000
Hammond	GA	1	0.50	0.80	3,252,464
Hammond	GA	2	0.50	0.80	3,252,464
Hammond	GA	3	0.50	0.80	3,252,464
Hammond	GA	4	0.50	0.50	24,556,996
Kraft	GA	1	0.45	0.60	1,434,816
Kraft	GA	2	0.45	0.60	1,434,816
Kraft	GA	3	0.45	0.60	1,434,816
McDonough	GA	1	0.45	0.45	17,786,887
McDonough	GA	2	0.45	0.45	17,786,887
McIntosh	GA	1	0.50	0.84	5,272,714
Mitchell	GA	3	0.45	0.65	3,087,400
Scherer	GA	3	0.45	0.32	51,627,214
Scholz	FL	1	0.50	0.70	723,608

