

One Energy Place
Pensacola, Florida 32520

850.444.6111



April 22, 1999

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

RECEIVED

APR 23 1999

**BUREAU OF
AIR REGULATION**

Dear Mr. Sheplak:

RE: Plant Lansing Smith Title IV Phase II NOx Compliance Plan
Southern System NOx Averaging Plan Revision
ORIS Code: 643
FDEP Draft Permit No: 005014-001-AV

Attached, please find a copy of Gulf Power's revised Phase II NOx Averaging Plan for the Lansing Smith Electric Generating Plant (ORIS Code 643). Please note that the new original signed copy of the averaging plan is attached to revised Gulf Power Crist Title IV NOx Averaging Plan dated April 22, 1999. ***This revised submission changes the Southern Company System NOx Averaging Plan to include four units at Plant Arkwright at Georgia Power.***

The NOx compliance plan for this unit utilizes a NOx averaging plan that includes other affected units in the Southern Company. Title V permitting authorities with jurisdiction over the units in the plan include the States of Alabama, Georgia and Mississippi, as well as the Jefferson County Department of Health in Alabama. Our sister operating companies within the Southern Company are providing their respective state environmental regulatory agencies a copy of this NOx averaging plan with their Phase II NOx permit compliance plans, thereby fulfilling the requirement of the General Instructions (Item 4a) to provide a copy of the plan to other Title V permitting authorities with jurisdiction over any units in the plan.

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

Sincerely,

A handwritten signature in black ink that reads "G. Dwain Waters, Q.E.P." The signature is written in a cursive style.

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

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Mr. Scott Sheplack

April 22, 1999

cc: Robert G. Moore, Gulf Power Company
James O Vick, Gulf Power Company
Kimberly D. Flowers, Gulf Power Company
Stan H. Houston, Gulf Power Company
Danny Herrin, Southern Company Services
R. Doug Neeley, EPA Region IV



Phase II NO_x Averaging Plan

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

Page 1

This submission is: New Revised

Page of

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 to page 3 if necessary.

Plant Name	State	ID#	(a) Emission Limitation	(b) Alt. Contemp. Emission Limitation	(c) Annual Heat Input Limit
See Page 3					

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

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

Btu-weighted annual average emission rate for same units operated in compliance with 40 CFR 76.5, 76.6 or 76.7

0.46

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

≤

≤

Where,

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

STEP 3

This plan is effective for calendar year _____ through calendar year _____ unless notification to terminate the plan is given.

Mark one of the two options and enter dates.

Treat this plan as identical plans, each effective for one calendar year for the following calendar years: 2000, 2001, 2002, 2003 and 2004 unless notification to terminate one or more of these plans is given.

STEP 4

Special Provisions

Read the special provisions and certification, enter the name of the designated representative, and sign and date.

Emission Limitations

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

- (i) For each unit, the unit's actual annual average emission rate for the calendar year, in lb/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and
 - (a) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,
 - (b) For each unit with an alternative contemporaneous emission limitation more stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, or
- (ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with 40 CFR 76.11(d)(1)(ii)(A) and (B), 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.
- (iii) If there is a successful group showing of compliance under 40 CFR 76.11(d)(1)(ii)(A) and (B) for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under (i).

Liability

The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.

Termination

The designated representative may submit a notification to terminate an approved averaging plan, in accordance with 40 CFR 72.40(d), 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 Charles D. McCrary	
Signature <i>Charles D. McCrary</i>	Date 4-15-99

Southern Company Averaging Plan Participating Plants
 as Listed in Step 1.

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	0.69	1,875,509
Arkwright	GA	2	0.45	0.70	1,886,089
Arkwright	GA	3	0.40	0.71	2,006,321
Arkwright	GA	4	0.40	0.75	1,932,669
Barry	AL	1	0.40	0.49	10,805,761
Barry	AL	2	0.40	0.49	10,643,159
Barry	AL	3	0.40	0.49	17,148,763
Barry	AL	4	0.40	0.37	25,471,720
Barry	AL	5	0.40	0.45	50,897,853
Bowen	GA	1	0.45	0.42	45,395,755
Bowen	GA	2	0.45	0.43	46,911,826
Bowen	GA	3	0.45	0.43	59,796,338
Bowen	GA	4	0.45	0.43	62,106,898
Branch	GA	1	0.68	0.99	14,906,580
Branch	GA	2	0.50	0.72	16,571,123
Branch	GA	3	0.68	0.84	27,015,768
Branch	GA	4	0.68	0.84	28,967,878
Crist	FL	4	0.45	0.52	3,062,929
Crist	FL	5	0.45	0.60	4,850,348
Crist	FL	6	0.50	0.45	17,603,755
Crist	FL	7	0.50	0.45	32,267,381
Daniel	MS	1	0.45	0.28	28,010,957
Daniel	MS	2	0.45	0.26	29,025,313
Gadsden	AL	1	0.45	0.65	2,473,380
Gadsden	AL	2	0.45	0.68	2,333,659
Gaston	AL	1	0.50	0.43	15,666,430
Gaston	AL	2	0.50	0.43	15,642,121
Gaston	AL	3	0.50	0.43	16,016,613
Gaston	AL	4	0.50	0.43	15,780,983
Gaston	AL	5	0.45	0.42	43,137,116
Gorgas	AL	6	0.46	0.86	5,058,595
Gorgas	AL	7	0.46	0.86	5,052,447
Gorgas	AL	8	0.40	0.49	11,173,785
Gorgas	AL	9	0.40	0.30	10,939,664
Gorgas	AL	10	0.40	0.76	46,251,622

Southern Company Averaging Plan Participating Plants
 Plant Name (from Step 1) as Listed in Step 1.

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

Plant Name	State	ID #	(a) Emission Limitation	(b) Alt. Contemp. Emission	(c) Annual Heat Input Limit
Greene Co	AL	1	0.68	0.98	19,524,675
Greene Co	AL	2	0.46	0.43	18,839,670
Hammond	GA	1	0.50	0.83	4,539,663
Hammond	GA	2	0.50	0.83	6,333,156
Hammond	GA	3	0.50	0.83	6,439,818
Hammond	GA	4	0.50	0.45	26,126,591
Kraft	GA	1	0.45	0.58	2,974,849
Kraft	GA	2	0.45	0.58	2,238,703
Kraft	GA	3	0.45	0.58	3,971,009
L. Smith	FL	1	0.40	0.62	9,199,644
L. Smith	FL	2	0.40	0.44	10,154,723
McDonough	GA	1	0.45	0.42	18,934,013
McDonough	GA	2	0.45	0.42	17,338,565
McIntosh	GA	1	0.50	0.86	8,568,975
Miller	AL	1	0.46	0.29	53,814,591
Miller	AL	2	0.46	0.29	52,772,559
Miller	AL	3	0.46	0.29	49,093,163
Miller	AL	4	0.46	0.29	55,722,252
Mitchell	GA	3	0.45	0.62	5,322,072
Scherer	GA	1	0.40	0.50	52,573,864
Scherer	GA	2	0.40	0.50	55,563,600
Scherer	GA	3	0.45	0.29	37,912,770
Scherer	GA	4	0.40	0.30	70,093,731
Scholz	FL	1	0.50	0.68	1,855,434
Scholz	FL	2	0.50	0.77	1,864,795
Wansley	GA	1	0.45	0.41	53,141,279
Wansley	GA	2	0.45	0.42	49,741,786
Watson	MS	4	0.50	0.50	17,100,575
Watson	MS	5	0.50	0.65	33,455,317
Yates	GA	1	0.45	0.48	3,853,527
Yates	GA	2	0.45	0.48	4,687,321
Yates	GA	3	0.45	0.48	3,981,916
Yates	GA	4	0.45	0.40	7,087,706
Yates	GA	5	0.45	0.40	5,186,897
Yates	GA	6	0.45	0.33	13,373,298
Yates	GA	7	0.45	0.30	14,601,869