

Gulf Power Company
500 Bayfront Parkway
Post Office Box 1151
Pensacola, FL 32520
Telephone 904 444-6111



February 14, 1996

Mr. John Brown, P. E. Administrator
Florida Department of Environmental Protection
Magnolia Courtyard
Tallahassee, Florida 32301

Dear John:

GULF POWER COMPANY EMISSION FEE EXEMPTION
PLANT CRIST UNITS 4, 5, 6, & 7
PLANT SCHOLZ UNITS 1 & 2

As you know, Gulf Power Company operates several electric utility generating units that are subject to Florida's Title V permitting program, and thus ordinarily would be required to pay state emission fees for these Title V units. However, pursuant to Section 403.0872(11)(a)8., Florida Statutes, and Rule 62-213.205(1)(h), F.A.C., emissions units that are "affected unit(s) under 42 U.S.C. s. 7651c" are exempt from the Department's emission fee requirements. Section 7651c of the Clean Air Act, in turn, contains the Phase I sulfur dioxide (SO₂) requirements. Gulf Power Company has two generating units that are listed in Table A of Section 7651 as Phase I units (Crist Units 6 and 7). Four other units have recently been designated as Phase I "substitution units" (Crist Units 4 and 5, and Scholz Units 1 and 2) pursuant to 40 CFR 72.41. Consequently, all six of the above-listed units are subject to the Phase I SO₂ requirements of Section 7651c. Therefore, each of these affected units are now exempt from Florida's Title V state emission fee requirements.

Gulf Power Company would appreciate the Department's written concurrence regarding this matter. If you have any questions in the meantime, please do not hesitate to contact me at (904) 444-6527.

Sincerely,

G. Dwain Waters
Air Quality Programs Coordinator

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Gulf Power

the southern electric system

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