Charles D. McCrary Chief Production Officer President -Southern Company Generation

November 23, 1999

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RECEIVED

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SOUTH

BUREAU OF AIR REGULATION Mr. Clair H. Fancy, P.E. Chief, Bureau of Air Regulation Air Resources Management Division Florida Department of Environmental Protection Mail Station 5500 2600 Blair Stone Road Tallahassee, Florida 32399 - 2400

Dear Mr. Fancy:

This letter is provided in accordance with the requirements outlined in Section IV Acid Rain Part and Appendix CP.-1 of the Crist Electric Generating Plant, Scholz Electric Generating Plant, and the Lansing Smith Electric Generating Plant Title V permits. On December 8, 1997, Southern Company submitted a Phase II NOx Averaging Plan to the States of Alabama, Florida, Georgia, and Mississippi and to Jefferson County, Alabama, with copies to the U.S. Environmental Protection Agency at Region IV and the Acid Rain Division. The plan was updated on April 15, 1999, from 71 to 75 units operated by Southern Company across the four state region. Following several comments from EPA Region IV and a few administrative changes, the plan was signed and resubmitted on July 23, 1999.

The initial Southern Company NOx averaging plan has been approved by the Alabama Department of Environmental Management, Georgia Environmental Protection Division, Mississippi Department of Environmental Quality, and the Jefferson County, Alabama, Department of Health. In conjunction with final approval of the averaging plan, the agencies have or are in the process of updating permits for these units per the November 18, 1999, letter to you from Mr. R. Douglas Neeley, U.S. Environmental Protection Agency.

This certification is based on information and belief formed after reasonable inquiry. To the best of my knowledge, the statements and information in this document are true, accurate, and complete as required by 62-213.420 (4) F.A.C.

If you have questions about the plan or the status of approval, please contact Mr. Danny Herrin, Manager, Clean Air Compliance, Southern Company Generation, at (205) 257-6468.

Sincerely. Charle W. Melnang

cc:

Ronald W. Gore, Alabama Department of Environmental Management

Ronald C. Methier, Georgia Environmental Protection Division

Dwight Wylie, Mississippi Department of Environmental Quality

James I. Carroll, Jefferson County Department of Health

R. Doug Neeley, U.S. Environmental Protection Agency Robert Miller, U.S. Environmental Protection Agency