

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

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BUREAU OF AIR REGULATION



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November 17, 2009

Mr. Jonathan Holtom P.E.
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5505
Tallahassee, Florida 32399-2400

Dear Mr. Holtom:

RE: LANSING SMITH ELECTRIC GENERATING PLANT
COMMENTS ON PROPOSED - TITLE V PERMIT RENEWAL
AIR PERMIT NO. 0050014-018-AV

Please find attached Gulf Power Comments on the "Draft" Lansing Smith Proposed Title V Renewal Permit of which the "Intent to Issue" was public noticed on October 19, 2009. Thanks again for the opportunity to comment and we look forward in working with you to resolve these few items of interest.

Please call me at (850) 444 - 6527 regarding any questions regarding these comments.

Sincerely,

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

G. Dwain Waters, Q.E.P.
Special Projects and Environmental Assets Coordinator

cc: w/att: Greg Terry, Gulf Power
Marie Largilliere, Gulf Power

Lansing Smith Draft Title V Comments:
Facility ID No: 0050014
Permit No. 0050014-18-AV
November 16, 2009

Comments:

1. SECTION I. FACILITY INFORMATION; Subsection C. Applicable Regulations: Please check the applicability of 62-212.400 F.A.C. BACT regulations for Units 001, 002, and 003.
2. SECTION II. FACILITY – WIDE CONDITIONS. FW-12. Gulf Power would like to revise this condition to use CEM as the compliance method similar to Condition A.9 and A.18. for Units 1 and 2 using CEMs heat input in lieu of monthly fuel. Gulf Power believes the new combined stack CEM system will provide an accurate account of heat input for this facility – wide NOx mass limit. This change will make the method consistent with Condition A. 9 and A. 18 requirements.
3. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 6 of 45) Please revise the Brief Description of EU 001 and 002 with the previous “Permit Note” information in lieu of all of the information as EU description information. See current Title V Permit for guidance.
4. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 7 of 45). A. 6 Visible Emissions. Please revise Condition to re-insert the lost previous Title V Permit reference to Secretarial Order(s) signed October 18, 1985 and December 1, 1982. See Appendix SO-1 for the Order(s).
5. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 8 of 45). A. 10 PM Emissions. Please revise Condition to re-insert the lost previous Title V Permit reference “as measured by applicable compliance methods. Also, please revise Condition to add lost “Permit Note: The averaging time shall correspond to the cumulative sample time, as specified in the reference test method.”
6. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 9 of 45). A. 18. NOx CEMS. Please see Item #2 for requested change in heat input method for calculating the Facility-Wide NOx limit. See A. 9 NOx Emission Cap for reference “as determined by CEMS data reported to the EPA Acid Rain database (including the NOx rate and heat input values).
7. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 10 of 45). A. 22. Test Methods. Please add Method 7 with 7E – Determination of Nitrogen Oxide Emissions from Stationary Sources.
8. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 11 of 45). A. 28. Visible Emissions. Please revise the “Permit Note:The transmissometers in use at this facility make a permanent recording every six-minutes based on an average of reading taken every 10 seconds.”
9. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 15 of 45). A. 42. Ambient Monitoring Requirement. Please delete Condition. Gulf Power no longer operates an ambient air monitoring network.

10. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 18 of 45). B. 17. Compliance Plan. Please delete Condition; Gulf Power is in full compliance with all applicable requirements at the time of the application.
11. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 19 of 45). C. 1. Permitted Capacity. Please re-insert lost Permit Note from existing Title V Permit. (See Existing Permit C.5 “ The heat input limitations have been placed in the permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit’s rated capacity (or to limit operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.”
12. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 22 of 45). C. 15. Natural Gas Monitoring Schedule. The last sentence of the Condition is obsolete and should be deleted: “Sulfur content of the natural gas will be monitored weekly by the natural gas supplier during the interim period when this monitoring schedule is being reexamined.”
13. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 23 of 45). C. 19. Test Methods. Please add Method 7 with 7E – Determination of Nitrogen Oxide Emissions from Stationary Sources.
14. APPENDIX I. List of Insignificant Emissions Units And/Or Activities. (Page I-1 or 1). Three diesel tanks were removed from the previous Title V Permit Insignificant List. Please re-insert 2 “Fire Pump Diesel Tanks @ 500 gallons each” and 1 “Emergency Generator Diesel Tank @ 500 gallons”. In addition, please add 1 new Diesel 1570 gallon Tank for the new Smith Combined Cycle Unit 4 & 5 Emergency Generator. Total addition request equal 4 tanks.
15. APPENDIX ICE. (Page ICE-1 of 1); Please add the new 2009 Emergency Generator for the Smith Combined Cycle Unit 4 & 5 as subject to Rule IIII and ZZZZ. This unit was outlined in an email to Jonathan Holtom on 10/22/09. The Emergency Generator is a Kohler 355 Kw generator; model #350REOZDD with a 550 Hp Detroit Diesel with a 1800 rpm rating. Please note that Gulf Power received a letter from the FDEP Site Certification Office on 11/16/09 clearing the way for this unit to be included in the Title V Permit.