



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 17, 2009

ELECTRONIC MAIL READ RECEIPT REQUESTED

Mr. Theodore J. McCullough – tjmccull@southernco.com
Vice President, Power Generation
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0100

Re: Request for Additional Information Regarding Title V Renewal Application
File No. 0050014-018-AV
Lansing Smith Plant
Lynn Haven, Bay County

Dear Mr. McCullough:

On May 18, 2009 the Department received your application for a Title V renewal permit for the Lansing Smith Plant. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. On attachment Smith.doc Trivial and Exempt Activities Summary, there are items that would likely better fit on the lists of Insignificant Activities or Unregulated Activities (i.e. Internal Combustion Engines which drive compressors, generators, water pumps, etc.). It is questionable that the combustion of the fuels associated with these units could be classified as trivial. Please clarify the intent of listing these activities here (see also item 3).
2. The current Title V permit for the Smith Plant includes an Appendix U-1, List of Unregulated Emissions Units and/or Activities. The renewal application does not include any reference to these activities. Please clarify if this was an accidental omission or if the unregulated emissions units listed in the existing permit are no longer at the facility.
3. Please specify if any of the facility's generators or other emissions units are subject to 40 CFR 60 Subpart III, Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE), 40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, or 40 CFR 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines. If applicable,
 - a. Please specify how the facility is complying with the applicable subpart(s).
 - b. Please provide the following information for each emission unit subject to the referenced subparts: in-service date, cylinder displacement, and rule applicability.

Theodore J. McCullough
July 17, 2009
Page 2 of 2

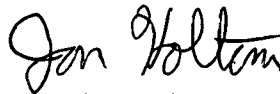
Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Should your response to any of the requested information require new calculations or result in changes to the previously submitted information, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form, certified by your Professional Engineer.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)5., F.A.C. In order to ensure that your acid rain permit is effective by January 1, 2010, you are highly encouraged to respond to this request as soon as possible.

If you should have any questions, please call Yousry Attalla (Joe), Engineering Specialist I, at (850) 921-9527.

Sincerely,



Jonathan Holtom, P.E., CPM
Title V Program Administrator
Bureau of Air Regulation

JH/ya

Copy to:

Mr. Theodore J. McCullough, Gulf Power Company: tjmccull@southernco.com
Mr. James O. Vick, Gulf Power Company: jovick@southernco.com
Mr. G. Dwain Waters, Q.E.P., Gulf Power Company: gdwaters@southernco.com
Mr. Rick Bradburn, DEP-NWD: rick.bradburn@dep.state.fl.us
Ms. Victoria Gibson, DEP-BAR: victoria.gibson@dep.state.fl.us (for reading file)

Friday, Barbara

To: tjmccull@southernco.com
Cc: Vick, James O.; gdwaters@southernco.com; Bradburn, Rick; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan
Subject: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV
Attachments: TheodoreJ.McCulloughGulfPowerCompany-LansingSmithRAI, File No. 0050014-018-AV.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> > .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

Friday, Barbara

From: McCullough, Theodore J. [TJMCCULL@southernco.com]
To: Friday, Barbara
Sent: Monday, July 20, 2009 10:01 AM
Subject: Read: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV

Your message

To: TJMCCULL@southernco.com
Subject:

was read on 7/20/2009 10:01 AM.

Friday, Barbara

From: Vick, James O. [JOVICK@southernco.com]
To: Friday, Barbara
Sent: Friday, July 17, 2009 11:16 AM
Subject: Read: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV

Your message

To: JOVICK@southernco.com
Subject:

was read on 7/17/2009 11:16 AM.

Friday, Barbara

From: Vick, James O. [JOVICK@southernco.com]
Sent: Friday, July 17, 2009 11:16 AM
To: Friday, Barbara
Subject: RE: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV

*Jim Vick
Director Environmental Affairs
8-420-6311
850-444-6311
Cell: 850-982-6204
Have a great day.*

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Friday, July 17, 2009 9:44 AM
To: McCullough, Theodore J.
Cc: Vick, James O.; Waters, G. Dwain; Bradburn, Rick; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan
Subject: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV

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Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you.

Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

Friday, Barbara

From: Waters, G. Dwain [GDWATERS@southernco.com]
To: undisclosed-recipients
Sent: Friday, July 17, 2009 11:28 AM
Subject: Read: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV

Your message

To: GDWATERS@southernco.com
Subject:

was read on 7/17/2009 11:28 AM.

Friday, Barbara

From: Waters, G. Dwain [GDWATERS@southernco.com]
Sent: Friday, July 17, 2009 11:30 AM
To: Friday, Barbara; McCullough, Theodore J.
Cc: Vick, James O.; Bradburn, Rick; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan
Subject: RE: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV

Gulf Power has received the RAI for Plant Smith Title V Permit Renewal and will respond in a timely manner. Thanks, Dwain

G. Dwain Waters, Q.E.P.
Special Projects and Environmental Assets Coordinator
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328
Phone: (850) 444-6527
Cell: (850) 336-6527
Fax: (850) 444-6080
gdwaters@southernco.com

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Friday, July 17, 2009 9:44 AM
To: McCullough, Theodore J.
Cc: Vick, James O.; Waters, G. Dwain; Bradburn, Rick; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan
Subject: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV

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Thank you,

Barbara Friday

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Friday, Barbara

From: Bradburn, Rick
Sent: Friday, July 17, 2009 10:44 AM
To: Friday, Barbara
Subject: Out of Office AutoReply: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV

I am currently out of the office until July 17th. If you need assistance, please contact Mary Beth Curle at mary.beth.curle@dep.state.fl.us or 850-595-8300 ext. 1220 and she will direct you to the appropriate person.

Thank you.

Friday, Barbara

From: System Administrator
To: Bradburn, Rick
Sent: Friday, July 17, 2009 10:44 AM
Subject: Delivered:Request for Additional Information, - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV

Your message

To: tjmccull@southernco.com
Cc: Vick, James O.; gdwaters@southernco.com; Bradburn, Rick; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan
Subject: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV
Sent: 7/17/2009 10:44 AM

was delivered to the following recipient(s):

Bradburn, Rick on 7/17/2009 10:44 AM

Friday, Barbara

From: Bradburn, Rick
To: Friday, Barbara
Sent: Monday, July 20, 2009 10:04 AM
Subject: Read: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV

Your message

To: tjmccull@southernco.com
Cc: Vick, James O.; gdwaters@southernco.com; Bradburn, Rick; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan
Subject: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV
Sent: 7/17/2009 10:44 AM

was read on 7/20/2009 10:04 AM.

Friday, Barbara

From: System Administrator
To: Gibson, Victoria; Attalla, Yousry
Sent: Friday, July 17, 2009 10:44 AM
Subject: Delivered:Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV

Your message

To: tjmccull@southernco.com
Cc: Vick, James O.; gdwaters@southernco.com; Bradburn, Rick; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan
Subject: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV
Sent: 7/17/2009 10:44 AM

was delivered to the following recipient(s):

Gibson, Victoria on 7/17/2009 10:44 AM
Attalla, Yousry on 7/17/2009 10:44 AM

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Friday, July 17, 2009 10:45 AM
Subject: Read: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV

Your message

To: tjmccull@southernco.com
Cc: Vick, James O.; gdwaters@southernco.com; Bradburn, Rick; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan
Subject: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV
Sent: 7/17/2009 10:44 AM

was read on 7/17/2009 10:45 AM.

Friday, Barbara

From: System Administrator
To: Holtom, Jonathan
Sent: Friday, July 17, 2009 10:44 AM
Subject: Delivered:Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV

Your message

To: tjmccull@southernco.com
Cc: Vick, James O.; gdwaters@southernco.com; Bradburn, Rick; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan
Subject: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV
Sent: 7/17/2009 10:44 AM

was delivered to the following recipient(s):

Holtom, Jonathan on 7/17/2009 10:44 AM

Friday, Barbara

From: Holtom, Jonathan
To: Friday, Barbara
Sent: Friday, July 17, 2009 11:13 AM
Subject: Read: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV

Your message

To: tjmccull@southernco.com
Cc: Vick, James O.; gdwaters@southernco.com; Bradburn, Rick; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan
Subject: Request for Additional Information - Gulf Power Company-Lansing Smith Plant, File No. 0050014-018-AV
Sent: 7/17/2009 10:44 AM

was read on 7/17/2009 11:13 AM.