

One Energy Place  
Pensacola, Florida 32520

Tel 850.444.6111

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SEP 24 2009

BUREAU OF AIR REGULATION



Certified Mail  
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September 22, 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  
REQUEST FOR ADDITIONAL INFORMATION RESPONSE  
AIR PERMIT NO. 0050014-018-AV

On July 16, 2009, Gulf Power received a Request for Additional Information (RAI) for the Smith Title V Renewal Application filed on May 18, 2009. The FDEP inquiry concerns the clarification of Trivial and Insignificant Activities lists, Unregulated Activities and applicability of the facility's internal combustion engines regarding NSPS and NESHAPS regulations. In this regard, please find enclosed the requested information on Lansing Smith Trivial/Insignificant Activities lists, Internal Combustion Engines and applicable certifications for the Responsible Official and Professional Engineer for this submittal.

Please call me at (850) 444 – 6527 regarding any questions regarding this RAI response.

Sincerely,

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

cc: w/att: Greg Terry, Gulf Power  
Marie Largilliere, Gulf Power  
Attalla Yousry, FDEP - Tallahassee  
Rick Bradburn, FDEP Northwest District

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APPLICATION INFORMATION

Application Responsible Official Certification

BUREAU OF AIR REGULATION

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Theodore J. McCullough

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):
[X] For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
[ ] For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
[ ] For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
[ ] The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.

3. Application Responsible Official Mailing Address...
Organization/Firm: Gulf Power Company
Street Address: One Energy Place
City: Pensacola State: FL Zip Code: 32520-0100

4. Application Responsible Official Telephone Numbers...
Telephone: (850) 444 - 6383 ext. Fax: (850) 444 - 4744

5. Application Responsible Official E-mail Address: TJMCCULL@southernco.com

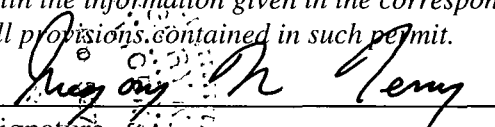
6. Application Responsible Official Certification:
I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

Signature [Handwritten Signature]

Date 9/22/09

# APPLICATION INFORMATION

## Professional Engineer Certification

1. Professional Engineer Name: Gregory N. Terry Registration Number: 52786
2. Professional Engineer Mailing Address... Organization/Firm: Gulf Power Company Street Address: One Energy Place City: Pensacola State: FL Zip Code: 32520-0328
3. Professional Engineer Telephone Numbers... Telephone: (850) 444 - 6144 ext. Fax: (850) 444 - 6080
4. Professional Engineer E-mail Address: <u>GNTERRY@southernco.com</u>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input checked="" type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature _____ (seal) _____ Date <u>9-21-09</u>

\* Attach any exception to certification statement.

## **Gulf Power Response to FDEP RAI Questions dated July 17, 2009**

### **FDEP Question #1:**

On attachment Smith.doc Trivial and Exempt Activities Summary, there are items that would better fit on the list 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).

### **Gulf Power Response:**

Gulf Power agrees that due to recent changes in regulations on Internal Combustion Engines that these sources (See additional information in item #3) should be relocated under unregulated or regulated units pursuant to the classification of the engines. The remaining items in the Smith.doc should remain as Trivial or Exempt Activities.

### **FDEP Question #2:**

The current Title V permit for Smith Plant includes an Appendix U-1 List of Unregulated Emissions Units/or Activities. The renewal application does not include any reference to the 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.

### **Gulf Power Response:**

Gulf Power requests that the currently permitted List of Unregulated Emissions Units/or Activities be incorporated into the new Smith Title V Permit. These items were addressed in the Smith Title V Application as Specific Emissions Units as unregulated.

### **FDEP Question #3:**

Please specify if any of the facility's generators or other emission units are subject to 40 CFR 60 Subpart IIII, 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.

### **Gulf Power Response:**

Please find enclosed a list of Plant Smith Internal Combustion Engines and a regulatory analysis of the applicability of the above requested regulations.

## **Plant Smith – Internal Combustion Engines (ICEs) List**

09/17/2009

### **1) Carry Deck Cherry Picker**

- Date purchased – 1998
- Manufacturer – Shuttlelift, Inc.
- Model – 3330ELB
- Engine – Cummins Diesel
- 4 cylinder
- 2500 rpm
- 80 hp
- Maintenance- general service on engine, no modifications
- Run as needed, primary function is lifting grass basket out near intake structure
- Averages 91 hours per year based on 2003-2008 data

### **2) Portable Welding machines – (3 units)**

- Date in service – 1995
- Manufacturer – Miller
- Model – Bobcat225D
- Engine – Deutz MD 151
- 2 cylinder
- 16.3 hp
- 3600 rpm
- 12 Kw
- Maintenance – regular service, no modifications
- Used as needed
- Welding machines average 97 hours per year each based on data from 2003-2008

### **3) Portable Welding machines – (1 unit)**

- Date in service – 2009
- Manufacturer – Miller
- Model – Bobcat250D
- Engine – Kubota Diesel Engine D722-E
- 3 cylinder
- Vertical, water cooled, 4 cycle
- 18.8 hp
- 3600 rpm
- 114 Kw
- Maintenance – regular service, no modifications
- Used as needed
- Welding machines average 97 hours per year of service based on 2003-2008 data
- This machine was new for 2009

#### 4) Fire Pumps – ( 2 units)

- Date in service – Prior to 2001
- Manufacturer – Detroit Diesel
- Model – 10647110 (4-71)
- Engine – Detroit Diesel
- 4 cylinder
- 2 Cycle
- Maintenance – regular service, no modifications
- Pumps are tested once per week and used for washing down the plant during outages
- Pumps average 52 hours of service per year based on 2003-2008 data

#### 5) Emergency Generator – (1 unit)

- Date in service – 2003
- Manufacturer – Kohler
- Engine - Volvo
- Model – D250 9.6A60
- 6 cylinder
- Inline, four-stroke diesel with direct injection
- Turbocharged
- Air-to-air cooled
- 280 hp (estimated based on similar specs)
- 1800 rpm
- 294 kW
- Maintenance – regular service, no modifications
- Tested bi-weekly for approximately 30 minutes

#### 6) Emergency Diesel Sump Pump (Big Blue) – (1 unit)

- Date in service – Prior to 2000
- Manufacturer – Detroit Diesel
- Engine – Detroit Diesel
- Model – T-71 (4031)C
- 6 cylinder
- 275 hp (estimated based on similar specs)
- 2100 rpm (estimated based on similar specs)
- Maintenance – regular service, no modifications
- Acts as backup for yard sump during heavy rainfall events
- Tested weekly for about 20 minutes

7) Diesel Building Sump on pump room floor – (1 unit)

- Date in service – Prior to 2001
- Manufacturer – Lister-Petter, Ltd
- Engine – Lister Diesel
- Model – HR4
- 4 cylinder
- Air cooled
- Fuel Injected
- 59 hp
- 2200 rpm
- Maintenance – regular service, no modifications
- Run weekly for 20-30 minutes for testing

8) Diesel Emergency Sump Pump (Big Orange) – (1 unit)

- Date in service – 2006
- Manufacturer – Godwin
- Engine – John Deere
- Model – PowerTech 6068TF275
- 6 cylinders
- In line 4 cycle
- Turbocharged
- 165 hp
- 2400 rpm
- 123 kW
- 6.8 L Displacement
- Maintenance – none to date other than fluid checks prior to running
- Less than 5 hours on unit
- Purchased for use during hurricanes to get water out of pump room floor
- Portable – trailer mounted
- Has emergency generation capability at 123 kW
- Meets 2005 EPA & California Non-road Compression Ignition Std.

**LANSING SMITH INTERNAL COMBUSTION ENGINE (ICE)  
REGULATORY ANALYSIS:**

**The following Compression Ignition Internal Combustion Engines are subject to NSPS 40 CFR Part 60 IIII:**

- **Smith Portable Welding Machine**
  - **Manufactured by Miller – 18.8 Hp**
  - **Manufactured after 04/01/2006**
  - **See item #3 in Smith ICE list**
- **Smith Emergency Sump Pump (Big Orange)**
  - **Manufactured by Godwin – 165 Hp**
  - **Manufactured after 04/01/2006**
  - **See item #8 in Smith ICE list**

**The following Internal Combustion Engines are subject to NSPS 40 CFR Part 60 JJJJ:**

- **None**

**The following Compression Ignition Internal Combustion Engines are subject to NESHAPS 40 CFR Part 63 ZZZZ with no applicable requirements:**

- **Smith Carry Deck Cherry Picker**
- **Smith Portable Welding Machines (3)**
- **Smith Portable Welding Machine (1)**
- **Smith Fire Pumps (2)**
- **Smith Emergency Generator**
- **Smith Emergency Diesel Sump Pump (Big Blue)**
- **Smith Diesel Sump Pump(Pump Room)**
- **Smith Emergency Sump Pump (Big Orange)**