



Florida Department of  
Environmental Protection

Memorandum

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TO: Joseph Kahn

THRU: Trina Vielhauer   
Jeff Koerner

FROM: Jonathan Holtom 

DATE: March 24, 2008

SUBJECT: Project No. 0050014-013-AC  
Final Construction Permit For Gulf Power - Smith  
Addition of SNCR on Units 1 and 2

Attached for your approval and signature is a final construction permit for Gulf Power's Smith Electric Generating Plant. This permit authorizes the addition of SNCR on Units 1 and 2.

The Public Notice requirements were met on March 4 by publishing in the Panama City News Herald. No comments were received from the public, but minor comments were received from the applicant; in response to this Public Notice. No petitions were filed for an Administrative Hearing.

I recommend your approval and signature.

Attachments

TLV/jk/jh

## FINAL DETERMINATION

Gulf Power Company  
Lansing Smith Electric Generating Plant  
Air Permit No. 0050014-013-AC

The Department distributed a public notice package on February 28, 2008, to authorize the installation of selective non-catalytic reduction (SNCR) technology on the existing Units 1 and 2 at the Gulf Power Lansing Smith Electric Generating Plant, which is located at 4300 County Road 2300, Lynne Haven, Bay County, Florida. The Public Notice of Intent to Issue was published in The Panama City News Herald on March 4, 2008.

### COMMENTS/CHANGES

No comments were received from the public during the 14-day public comment period; however, minor comments were received from the applicant and the permit was changed as shown below. Deletions are indicated by a ~~strike through~~ and additions are indicated by a double underline.

**Comment #1. Section I. General Information, Facility and Projection Description (Page 2 of 7).**

Please correct the description of Smith CT (i.e. one combustion turbine driven by two jet engines). Thus, the description should read: "The existing plant consists of two coal fired steam generators (boilers), one combustion turbine (used to drive a single generator) driven by two jet engines, and two gas-fired combined-cycle combustion turbine generators with duct-fired recovery steam generators (HRSG)."

Response 1. The requested change has been made as follows:

The existing plant consists of two coal fired steam generators (boilers); ~~two~~ one combustion turbines (used to drive a single generator ~~two separate peaking generators~~) driven by two a single jet engines; and, two gas-fired combined-cycle combustion turbine electrical generators with duct-fired heat recovery steam generators (HRSG).

**Comment #2. Section I. General Information, Facility and Projection Description (Page 2 of 7).**

Revise the sentence: "Over fired air injection ports will also be added to Unit 1." to "High Momentum injector ports will also be added to Unit 1." The correct terminology is "High Momentum injector ports". Unit 1 will not have over fired air injection.

Response 2. The requested change has been made, as follows:

This permit authorizes the installation of High Energy Reagent Technology (HERT) selective non-catalytic reduction (SNCR) systems on Units 1 and 2 to reduce emissions of nitrogen oxides (NO<sub>x</sub>) as part of the plant's strategy for complying with the Clean Air Interstate Rule (CAIR). ~~Over fired air injection~~ High Momentum injector ports will also be added to Unit 1. Unit 2 is already equipped with over fired air technology.

**Comment #3. Section 3. Emissions Unit Specific Conditions Equipment and Construction (Page 4 of 7), Condition 2. Selective Non-Catalytic Reduction (SNCR) System.**

Please revise the sentence: "The minimum manufacturer's guaranteed NO<sub>x</sub> conversion efficiency for Unit 1 is 50% and the minimum manufacturers guaranteed NO<sub>x</sub> conversion efficiency for Unit 2 is 30% as measured across the SNCR unit inlet and outlet." To "The maximum manufacturer's guaranteed NO<sub>x</sub> conversion efficiency for Unit 1 is 50% and the maximum manufacturers guaranteed NO<sub>x</sub> conversion efficiency for Unit 2 is 30% as determined from baseline measurements." It should be noted that the above referenced baseline

## FINAL DETERMINATION

Gulf Power Company  
Lansing Smith Electric Generating Plant  
Air Permit No. 0050014-013-AC

conditions are representative of the unit's operational conditions and the fuel usage at the time of the baseline tests and does not necessarily represent an emissions inlet or baseline limitation. In addition, it should be noted that the SNCR systems are not required to be operated to comply with any operational limitation or emissions removal efficiency.

Response 3. The Department agrees that NO<sub>x</sub> conversion efficiency is somewhat dependent upon the amount of nitrogen contained in the fuel at any particular time and that measurement across the SNCR inlet and outlet is not possible since the urea will be injected directly into the boilers. As a result of this request, Condition 2 has been changed as follows:

2. Selective Non-Catalytic Reduction (SNCR) System: The permittee is authorized to construct, tune, operate, and maintain a new HERT SNCR system for Units 1 & 2 to reduce emissions of NO<sub>x</sub> as described in the application, approved drawings, plans, and other documents on file with the Department. Based on the fuel used and the operating conditions recorded during the baseline testing authorized by air construction permit No. 0050014-012-AC, the minimum manufacturer's guaranteed designed target NO<sub>x</sub> conversion efficiency for Unit 1 is 50% and the minimum manufacturer's guaranteed designed target NO<sub>x</sub> conversion efficiency for Unit 2 is 30%, as measured across the SNCR unit inlet and outlet. The designed target ammonia slip level is 5 ppmv based on a 24-hour average. [Design]

**Comment #4. Section 3. Emissions Unit Specific Conditions Equipment and Construction (Page 5 of 7), Condition 2. Selective Non-Catalytic Reduction (SNCR) System.** *Permit Note: Under the Ammonia Slip section, Please revise the sentence: "When ammonia measurements in the flue gas are required, a wet chemical method will be utilized." To "When ammonia measurements in the flue gas are required, a wet chemical method or other methods approved by EPA will be utilized."*

Response 4. The requested change is acceptable and has been made as follows:

- ***Ammonia Slip:** The SNCR is designed and guaranteed to have a maximum ammonia slip concentration of 5 ppmvd corrected to 3% O<sub>2</sub> (24 hour basis) in the duct cross-sectional area for all boiler loads. There are no provisions for continuously monitoring ammonia concentration in the flue gas. When ammonia measurements in the flue gas are required, a wet chemical method or other methods approved by EPA will be utilized. Although not required, more frequent tracking of ammonia slip will be monitored by measuring the amount of residual ammonia adsorbed by the fly ash. Fly ash samples will be measured periodically using an ion-specific electrode.*

**Comment #5. Section 3. Emissions Unit Specific Conditions Equipment and Construction (Page 5 of 7), Condition 4. Nitrogen Oxides. Performance Tests.** Please revise the sentence: "The permittee shall concurrently test the SNCR inlet and SNCR outlet in accordance with EPA Method 7E as adopted by reference in Rule 62-204.800. F.A.C." It is not possible to test concurrently the inlet and outlet of the Smith SNCR systems since the technology involves injection directly into the boiler, there is not an inlet but a baseline or uncontrolled condition. Gulf Power requests that an initial test at the outlet be conducted to demonstrate the SNCR design guarantees as determined from baseline tests under similar conditions. In addition as noted in the permit note, the SNCR system is not required to comply with the facility-wide NO<sub>x</sub> emissions cap, thus there should be no annual requirement to demonstrate the NO<sub>x</sub> removal efficiency of the Smith SNCR systems.

## FINAL DETERMINATION

Gulf Power Company  
Lansing Smith Electric Generating Plant  
Air Permit No. 0050014-013-AC

Response 5. The Department understands that measurement across the SNCR inlet and outlet is not possible since the urea will be injected directly into the boilers. Also, the permit does not contain a requirement to test NO<sub>x</sub> emissions annually. As a result of this request, Condition 4 has been changed as follows:

4. Nitrogen Oxides, Performance Tests: Within 60 days after completing construction of the SNCR system and bringing Units 1 and 2 back on line, the permittee shall conduct tests to demonstrate the operational capabilities of the installed HERT SNCR system as compared to the design specification to achieve a 50% reduction in the nitrogen oxide emission rate for Unit 1 and 30% for Unit 2. The permittee shall ~~concurrently~~ test the ~~SNCR inlet and~~ SNCR outlet in accordance with EPA Method 7E as adopted by reference in Rule 62-204.800, F.A.C. Data collected from the NO<sub>x</sub> CEMS may be used to represent NO<sub>x</sub> emissions at the SNCR outlet. The data shall be collected for at least three consecutive hours and compared to the data collected during the baseline tests authorized by permit No. 0050014-012-AC, including a comparison of the fuel quality and operating conditions present during each of the tests. The purpose of the tests is to determine the actual installed control capabilities of the SNCR systems. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

**Comment #6. Section 3. Emissions Unit Specific Conditions Equipment and Construction (Page 5 of 7), Condition 5. Ammonia Slip, Performance Tests.** Delete the sentence: "Subsequent tests shall be conducted during each federal fiscal year." Gulf Power believes that only an initial test should be required to demonstrate design guarantees for control systems not required for compliance as noted in the permit note. See similar Crist SNCR permit conditions.

Response 6. Condition 5 has been changed as follows:

5. Ammonia Slip, Performance Tests: Within 60 days after completing construction of the SNCR system and bringing Units 1 and 2 back on line and upon Department request thereafter, the permittee shall conduct tests to determine the ammonia slip rate in accordance with EPA Method CTM-027 or other methods approved by EPA. ~~Subsequent tests shall be conducted during each federal fiscal year.~~ If tests show ammonia slip emissions are greater than the design target level specified in Condition No. 2 of this subsection, the permittee shall take corrective actions such as repair, addition of urea injectors for better mixing, addition of mixing vanes in the duct, etc. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

**Comment #7. Section 3. Emissions Unit Specific Conditions Equipment and Construction (Page 6 of 7), Condition 6. SNCR Urea Injection Rate Monitor.** Delete this section. The manufacturer's specification (bid proposal) does not include measurement of urea flow and injection rate. The design includes a control system for measurement of dilution water. The system has no provisions to collect and maintain records of actual urea injection rates.

Response 7. The ability to monitor the urea injection rate is a necessary component for this type of control device. As such, this requirement will remain in the permit.

**Comment #8. Section 4. Appendix Standard Conditions (Page SC-1), 2. General Visible Emissions.** It should be noted that Smith Unit 1 and 2 has a 40% opacity standard and that the general visible emissions standard does not apply.

## **FINAL DETERMINATION**

Gulf Power Company  
Lansing Smith Electric Generating Plant  
Air Permit No. 0050014-013-AC

Response 8. Standard Condition 2 applies to everything at the facility, but is qualified by the phrase "Unless otherwise specified in the permit...". No changes are needed as a result of this comment.

In addition to the above, the applicant made similar comments on the Technical Evaluation regarding High Momentum injectors (see response 2), vacating the Clean Air Mercury Rule and the design rate of the SNCR system. These comments are noted and are part of the record for this project. Where appropriate, changes were made to the draft permit as noted above; however, there were no changes made to the Technical Evaluation as a result of these comments.

### **CONCLUSION**

The final action of the Department is to issue the final permit with the changes noted above.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
**NOTICE OF FINAL PERMIT**

In the Matter of an  
Application for Permit by:

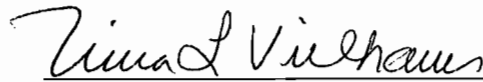
Mr. G. Dwain Waters, Q.E.P.  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0328

Air Permit No. 0050014-013-AC  
Lansing Smith Electric Generating Plant  
Bay County

Enclosed is Final Permit Number 0050014-013-AC. This permit authorizes installation of selective non-catalytic reduction systems for Units 1 and 2 at the existing Lansing Smith Electric Generating Station. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief  
Bureau of Air Regulation

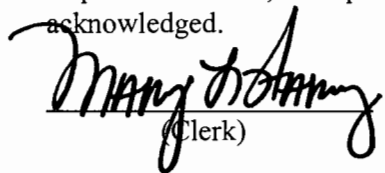
**CERTIFICATE OF SERVICE**

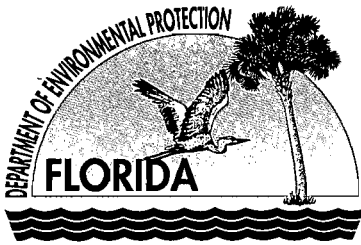
The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Determination and the Final Permit) was sent by e-mail with return receipt requested before the close of business on 3/27/08 to the persons listed:

- G. Dwain Waters, Q.E.P., Gulf Power Company ([gdwaters@southernco.com](mailto:gdwaters@southernco.com))
- Gregory N. Terry, P.E., Gulf Power Company ([gnterry@southernco.com](mailto:gnterry@southernco.com))
- Rick Bradburn, DEP-NWD ([rick.bradburn@dep.state.fl.us](mailto:rick.bradburn@dep.state.fl.us))
- Jim Little, EPA Region 4 ([little.james@epamail.epa.gov](mailto:little.james@epamail.epa.gov))
- Katy Forney, EPA Region 4 ([forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov))

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**  
**FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

  
(Clerk) 3/27/08  
(Date)



# 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

## PERMITTEE

Gulf Power Company  
One Energy Place  
Pensacola, FL 32520-0328

*Authorized Representative:*

G. Dwain Waters, Q.E.P., Air Quality Programs Supervisor

Smith Electric Generating Plant  
Units 1 & 2 SNCR Project  
Facility ID No. 0050014  
SIC No. 4911  
Air Permit No. 0050014-013-AC  
Permit Expires: December 31, 2009

## PROJECT AND LOCATION

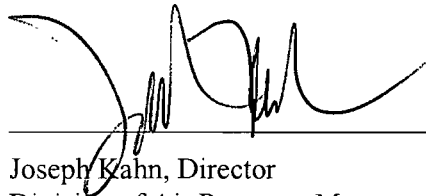
This permit authorizes installation of a selective non-catalytic reduction system for Units 1 and 2 at the existing Lansing Smith Electric Generating Station, which is located 4300 County Road, Lynne Haven, Bay County, Florida. The map coordinates are: Zone 16; 625.05 km East; and 3349.24 km North.

## STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department. This air construction permit supplements all other valid air construction and operation permits.

## CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices



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Joseph Kahn, Director  
Division of Air Resource Management

3/26/08  
(Date)

## SECTION 1. GENERAL INFORMATION

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### FACILITY AND PROJECT DESCRIPTION

The existing plant consists of two coal fired steam generators (boilers); one combustion turbine (used to drive a single generator) driven by two jet engines; and, two gas-fired combined-cycle combustion turbine electrical generators with duct-fired heat recovery steam generators (HRSG). The two boilers are Acid Rain Phase II Units. The two combined-cycle combustion turbines are also Acid Rain units. Pulverized coal is the primary fuel for the boilers. Distillate fuel oil is used to fire the combustion turbine and as a "back-up" fuel for the boilers. The following units are affected by this air construction permit.

ID	Emission Unit Description
-001	Boiler Number 1 - 1,944.8 MMBtu/hour (Phase II Acid Rain Unit)
-002	Boiler Number 2 - 2,246.2 MMBtu/hour (Phase II Acid Rain Unit)

This permit authorizes the installation of High Energy Reagent Technology (HERT) selective non-catalytic reduction (SNCR) systems on Units 1 and 2 to reduce emissions of nitrogen oxides (NO<sub>x</sub>) as part of the plant's strategy for complying with the Clean Air Interstate Rule (CAIR). High Momentum injector ports will also be added to Unit 1. Unit 2 is already equipped with over fired air technology.

### REGULATORY CLASSIFICATION

Title III: The existing facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The existing facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

### RELEVANT DOCUMENTS

The permit application and additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.



## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: All documents related to applications for permits to construct, modify, or operate emissions units at this facility shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all permit applications shall also be sent to the Compliance Authority.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northwest District Office at 160 Governmental Center, Pensacola, Florida 32501-5794.
3. Appendices: The following Appendices are attached as part of this permit: Appendix CF (Citation Format); Appendix GC (General Conditions); and, Appendix SC (Standard Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-4, 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Construction Approval: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Rule 62-210.200(76), F.A.C. defines *construction* as, "The act of performing on-site fabrication, erection, installation or modification of an emissions unit or facility of a permanent nature, including installation of foundations or building supports; laying of underground pipe work or electrical conduit; and fabrication or installation of permanent storage structures, component parts of an emissions unit or facility, associated support equipment, or utility connections. Land clearing and other site preparation activities are not a part of the construction activities." Such permits shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions units. The permittee shall apply for a Title V operation permit (revision) at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### Emissions Units 001 & 002

This section of the permit addresses the following existing emissions units:

ID	Emission Unit Description
001	Boiler No. 1 (Phase II Acid Rain Unit)
002	Boiler No. 2 (Phase II Acid Rain Unit)

#### Emissions Unit Nos. 001 & 002

*Description:* Unit 1 is a tangentially fired, dry bottom boiler that began commercial operation on May 12, 1965. Unit 2 is a tangentially fired, dry bottom boiler that began commercial operation on April 9, 1967.

*Fuels:* Coal, new No. 2 fuel oil and/or on-specification used oil (for start-up and flame stabilization), and occasional on-site generated "oil contaminated soil".

*Unit 1 Capacity:* 1,944.8 MMBtu/hour when firing pulverized coal, 153 MMBtu/hr when firing oil.

*Unit 2 Capacity:* 2,246.2 MMBtu/hour when firing pulverized coal, 76 MMBtu/hr when firing oil.

*PM Controls:* Hot-side and cold-side electrostatic precipitators.

*NO<sub>x</sub> Controls:* Low-NO<sub>x</sub> burners and selective non-catalytic reduction (SNCR).

*Continuous Monitors:* Carbon dioxide (CO<sub>2</sub>), NO<sub>x</sub>, sulfur dioxide (SO<sub>2</sub>), opacity, stack gas flow, and urea injection rate.

*Stack Parameters:* Units 1 & 2 share a common stack that is 199 feet tall with a diameter of 18 feet. The volumetric flow rate of Units 1 & 2 combined, at permitted capacity, is approximately 1,567,967 acfm.

*{Permitting Notes: Based on the current Title V air operation permit, Units 1 & 2: are regulated under Rule 62-296.405, F.A.C. (Fossil Fuel Fired Steam Generators > 250 MMBtu/Hour Heat Input); have not undergone PSD Preconstruction Review; and are regulated under Phase II of the federal Acid Rain Program (40 CFR 75).}*

#### PREVIOUS APPLICABLE REQUIREMENTS

1. Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for these emissions units. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070, F.A.C.]

#### EQUIPMENT AND CONSTRUCTION

2. Selective Non-Catalytic Reduction (SNCR) System: The permittee is authorized to construct, tune, operate, and maintain a new HERT SNCR system for Units 1 & 2 to reduce emissions of NO<sub>x</sub> as described in the application, approved drawings, plans, and other documents on file with the Department. Based on the fuel used and the operating conditions recorded during the baseline testing authorized by air construction permit No. 0050014-012-AC, the designed target NO<sub>x</sub> conversion efficiency for Unit 1 is 50% and the designed target NO<sub>x</sub> conversion efficiency for Unit 2 is 30%, as compared to the data collected during the baseline testing. The designed target ammonia slip level is 5 ppmv based on a 24-hour average. [Design]

*{Permitting Note: Advanced Combustion Technology, Inc. designed the new HERT SNCR system, which will generally consist of the following:*

- **UREA Injection System:** Urea will be delivered by truck and stored on site as a 50% aqueous solution in one 45,000 gallon tank. It is expected that the tank will be maintained at about 2/3 capacity to avoid the possibility of an overflow. This will provide enough urea for about 5½ days of operation. The solution will be maintained at a temperature of approximately 90° F by circulating through the SNCR

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### Emissions Units 001 & 002

system piping loop heating module. Using plant service water or other dilution water source, the metering module dilutes the reagent to a predetermined concentration (somewhat less than 30%) and precisely controls the flow of the diluted reagent to distribution modules located near the boiler injection point. The distribution modules provide the final control of diluted reagent and atomizing/cooling (plant) air being delivered to each injector. The diluted reagent is injected into the boiler via wall-mounted air atomizing lances, which will be installed in the upper levels of the boiler at locations to be determined by the manufacturer. At peak load, the urea injection rate will be about 145 gallons per hour (gph) for Unit 1 and about 135 gph for Unit 2. This translates to an ammonia flow for Unit 1 of 391 lb/hr and for Unit 2 of 364 lb/hr, on a dry basis.

- **Ammonia Slip:** *The SNCR is designed and guaranteed to have a maximum ammonia slip concentration of 5 ppmvd corrected to 3% O<sub>2</sub> (24 hour basis) in the duct cross-sectional area for all boiler loads. There are no provisions for continuously monitoring ammonia concentration in the flue gas. When ammonia measurements in the flue gas are required, a wet chemical method or other methods approved by EPA will be utilized. Although not required, more frequent tracking of ammonia slip will be monitored by measuring the amount of residual ammonia adsorbed by the fly ash. Fly ash samples will be measured periodically using an ion-specific electrode.*
3. **Updated Designs:** The permittee shall update the Department with final design specifications and any substantial changes made to the final design specifications during the actual construction phase. [Rule 62-4.070(3), F.A.C.]

### PERFORMANCE REQUIREMENTS

*{Permitting Note: The use of the SNCR system is not required to comply with the facility-wide NO<sub>x</sub> emissions cap of 6,666 tons per year. The SNCR will be operated at the owners discretion as part of the plant's strategy to comply with the requirements of the Clean Air Interstate Rule (CAIR).}*

### EMISSIONS PERFORMANCE TESTING

4. **Nitrogen Oxides, Performance Tests:** Within 60 days after completing construction of the SNCR system and bringing Units 1 and 2 back on line, the permittee shall conduct tests to demonstrate the operational capabilities of the installed HERT SNCR system as compared to the design specification to achieve a 50% reduction in the nitrogen oxide emission rate for Unit 1 and 30% for Unit 2. The permittee shall test the SNCR outlet in accordance with EPA Method 7E as adopted by reference in Rule 62-204.800, F.A.C. Data collected from the NO<sub>x</sub> CEMS may be used to represent NO<sub>x</sub> emissions at the SNCR outlet. The data shall be collected for at least three consecutive hours and compared to the data collected during the baseline tests authorized by permit No. 0050014-012-AC, including a comparison of the fuel quality and operating conditions present during each of the tests. The purpose of the tests is to determine the actual installed control capabilities of the SNCR systems. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]
5. **Ammonia Slip, Performance Tests:** Within 60 days after completing construction of the SNCR system and bringing Units 1 and 2 back on line and upon Department request thereafter, the permittee shall conduct tests to determine the ammonia slip rate in accordance with EPA Method CTM-027 or other methods approved by EPA. If tests show ammonia slip emissions are greater than the design target level specified in Condition No. 2 of this subsection, the permittee shall take corrective actions such as repair, addition of urea injectors for better mixing, addition of mixing vanes in the duct, etc. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

*{Permitting Note: EPA Methods 1 (Traverse Points), 2 (Velocity and Flow Rate), 3 (Gas Analysis), 4 (Moisture Content), and 19 (Calculating Emission Rates, Use of F-Factors) may also be used to supplement the required test methods.}*

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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### Emissions Units 001 & 002

#### CONTINUOUS MONITORING REQUIREMENTS

*{Permitting Note: In accordance with the federal Acid Rain requirements, the following continuous monitors are installed on these units: SO<sub>2</sub>, NO<sub>x</sub>, CO<sub>2</sub> and stack gas flow.}*

6. SNCR Urea Injection Rate Monitor: In accordance with the manufacturer's specifications, the permittee shall install, calibrate, operate and maintain a flow meter to measure and record the urea injection rate for the SNCR system. [Rules 62-4.070(3) and 62-212.400(5)(c), F.A.C.]

#### RECORDS AND REPORTS

7. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the provisions of Rule 62-297.310(8), F.A.C. For each required test run, the report shall indicate the actual heat input rate (MMBtu/hour), the NO<sub>x</sub> emission rate (lb/MMBtu) as recorded by the CEMS, and the urea injection rate (lb/hour). The report shall also include copies of the continuous monitoring records for the NO<sub>x</sub> emissions. [Rule 62-297.310(8), F.A.C.]

**SECTION 4. APPENDICES**

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**C. Appendix SC – Standard Conditions**

Appendix CF - Citation Format;  
Appendix GC - General Conditions;  
Appendix SC - Standard Conditions

**SECTION 4. APPENDIX CF**  
**CITATION FORMATS**

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*The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.*

Old Permit Numbers

*Example:* Permit No. AC50-123456 or Air Permit No. AO50-123456

*Where:* "AC" identifies the permit as an Air Construction Permit  
"AO" identifies the permit as an Air Operation Permit  
"123456" identifies the specific permit project number

New Permit Numbers

*Example:* Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

*Where:* "099" represents the specific county ID number in which the project is located  
"2222" represents the specific facility ID number  
"001" identifies the specific permit project  
"AC" identifies the permit as an air construction permit  
"AF" identifies the permit as a minor federally enforceable state operation permit  
"AO" identifies the permit as a minor source air operation permit  
"AV" identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

*Example:* Permit No. PSD-FL-317

*Where:* "PSD" means issued pursuant to the Prevention of Significant Deterioration of Air Quality  
"FL" means that the permit was issued by the State of Florida  
"317" identifies the specific permit project

Florida Administrative Code (F.A.C.)

*Example:* [Rule 62-213.205, F.A.C.]

*Means:* Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

*Example:* [40 CFR 60.7]

*Means:* Title 40, Part 60, Section 7

**SECTION 4. APPENDIX GC**  
**GENERAL CONDITIONS**

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The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
  - a. Have access to and copy and records that must be kept under the conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of non-compliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73

**SECTION 4. APPENDIX GC**  
**GENERAL CONDITIONS**

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and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - a. Determination of Best Available Control Technology (not applicable to project);
  - b. Determination of Prevention of Significant Deterioration (not applicable to project); and
  - c. Compliance with New Source Performance Standards (not applicable to project).
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - 1) The date, exact place, and time of sampling or measurements;
    - 2) The person responsible for performing the sampling or measurements;
    - 3) The dates analyses were performed;
    - 4) The person responsible for performing the analyses;
    - 5) The analytical techniques or methods used; and
    - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.



**SECTION 4. APPENDIX SC**  
**STANDARD CONDITIONS**

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Unless otherwise specified by permit or rule, the following conditions apply to all emissions units and activities at this facility.

**EMISSIONS AND CONTROLS**

1. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
2. General Visible Emissions: Unless otherwise specified in the permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. [Rule 62-296.320(4)(b)1, F.A.C.]
3. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

**TESTING REQUIREMENTS**

4. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
5. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
6. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
7. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
  - a. *Required Sampling Time*. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
  - b. *Minimum Sample Volume*. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
  - c. *Calibration of Sampling Equipment*. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

[Rule 62-297.310(4), F.A.C.]

**SECTION 4. APPENDIX SC**  
**STANDARD CONDITIONS**

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8. Determination of Process Variables

- a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

9. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.

10. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]

11. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

12. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.

**SECTION 4. APPENDIX SC**  
**STANDARD CONDITIONS**

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14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

**RECORDS AND REPORTS**

13. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]

**Harvey, Mary**

**From:** Harvey, Mary  
**Sent:** Thursday, March 27, 2008 10:48 AM  
**To:** 'G. Dwain Waters, Q.E.P., Gulf Power Company'; 'Gregory N. Terry, P.E., Gulf Power Company'; Bradburn, Rick; 'Jim Little, EPA Region 4'; 'Katy Forney, EPA Region 4'  
**Cc:** Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Gulf Power Company - SMITH - Facility #0050014-013-AC-FINAL  
**Attachments:** Document.pdf; FINLDET 0050014-013-AC-F.PDF; Finlnote 0050014-013-AC.PDF; Smith 1 & 2 SNCR Appendix.PDF; Smith 1&2 SNCR Final Permit.PDF

Tracking:	Recipient	Delivery	Read
✓	G. Dwain Waters, Q.E.P., Gulf Power Company'		
✓	'Gregory N. Terry, P.E., Gulf Power Company'		
✓	Bradburn, Rick	Delivered: 3/27/2008 10:48 AM	Read: 3/27/2008 10:53 AM
	'Jim Little, EPA Region 4'		
	'Katy Forney, EPA Region 4'		
✓	Holtom, Jonathan	Delivered: 3/27/2008 10:48 AM	Read: 3/27/2008 10:58 AM
	Walker, Elizabeth (AIR)	Delivered: 3/27/2008 10:48 AM	
✓	Gibson, Victoria	Delivered: 3/27/2008 10:48 AM	Read: 3/27/2008 10:59 AM

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,

DEP, Bureau of Air Regulation

3/27/2008

**Harvey, Mary**

**From:** Waters, G. Dwain [GDWATERS@southernco.com]  
**Sent:** Friday, March 28, 2008 9:00 AM  
**To:** Harvey, Mary  
**Subject:** RE: Gulf Power Company - SMITH - Facility #0050014-013-AC-FINAL

Gulf Power has received the above reference permit for Plant Smith. 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) 444-6217  
gdwaters@southernco.com

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**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Thursday, March 27, 2008 9:48 AM  
**To:** Waters, G. Dwain; Terry, Greg N.; Bradburn, Rick; Jim Little, EPA Region 4; Katy Forney, EPA Region 4  
**Cc:** Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Gulf Power Company - SMITH - Facility #0050014-013-AC-FINAL

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3/28/2008

## Harvey, Mary

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**From:** Bradburn, Rick  
**To:** Harvey, Mary  
**Sent:** Thursday, March 27, 2008 10:53 AM  
**Subject:** Read: Gulf Power Company - SMITH - Facility #0050014-013-AC-FINAL

### Your message

**To:** 'G. Dwain Waters, Q.E.P., Gulf Power Company'; 'Gregory N. Terry, P.E., Gulf Power Company'; Bradburn, Rick; 'Jim Little, EPA Region 4'; 'Katy Forney, EPA Region 4'  
**Cc:** Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Gulf Power Company - SMITH - Facility #0050014-013-AC-FINAL  
**Sent:** 3/27/2008 10:48 AM

was read on 3/27/2008 10:53 AM.

## Harvey, Mary

---

**From:** Holtom, Jonathan  
**To:** Harvey, Mary  
**Sent:** Thursday, March 27, 2008 10:58 AM  
**Subject:** Read: Gulf Power Company - SMITH - Facility #0050014-013-AC-FINAL

### Your message

**To:** 'G. Dwain Waters, Q.E.P., Gulf Power Company'; 'Gregory N. Terry, P.E., Gulf Power Company'; Bradburn, Rick; 'Jim Little, EPA Region 4'; 'Katy Forney, EPA Region 4'  
**Cc:** Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Gulf Power Company - SMITH - Facility #0050014-013-AC-FINAL  
**Sent:** 3/27/2008 10:48 AM

was read on 3/27/2008 10:58 AM.

## Harvey, Mary

---

**From:** Waters, G. Dwain [GDWATERS@southernco.com]  
**To:** Harvey, Mary  
**Sent:** Thursday, March 27, 2008 10:57 AM  
**Subject:** Read: Gulf Power Company - SMITH - Facility #0050014-013-AC-FINAL

Your message

To: GDWATERS@southernco.com  
Subject:

was read on 3/27/2008 10:57 AM.



## Harvey, Mary

---

**From:** Terry, Greg N. [GNTERRY@southernco.com]  
**To:** Harvey, Mary  
**Sent:** Thursday, March 27, 2008 10:57 AM  
**Subject:** Read: Gulf Power Company - SMITH - Facility #0050014-013-AC-FINAL

Your message

To: GNTERRY@southernco.com  
Subject:

was read on 3/27/2008 10:57 AM.

## Harvey, Mary

---

**From:** Gibson, Victoria  
**To:** Harvey, Mary  
**Sent:** Thursday, March 27, 2008 10:59 AM  
**Subject:** Read: Gulf Power Company - SMITH - Facility #0050014-013-AC-FINAL

Your message

**To:** 'G. Dwain Waters, Q.E.P., Gulf Power Company'; 'Gregory N. Terry, P.E., Gulf Power Company'; Bradburn, Rick; 'Jim Little, EPA Region 4'; 'Katy Forney, EPA Region 4'  
**Cc:** Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Gulf Power Company - SMITH - Facility #0050014-013-AC-FINAL  
**Sent:** 3/27/2008 10:48 AM

was read on 3/27/2008 10:59 AM.

## Harvey, Mary

---

**From:** Forney.Kathleen@epamail.epa.gov  
**Sent:** Friday, March 28, 2008 12:30 PM  
**To:** Harvey, Mary  
**Subject:** Re: Gulf Power Company - SMITH - Facility #0050014-013-AC-FINAL

thanks

-----  
Katy R. Forney  
Air Permits Section  
EPA - Region 4  
61 Forsyth St., SW  
Atlanta, GA 30303

Phone: 404-562-9130  
Fax: 404-562-9019

"Harvey, Mary"  
<Mary.Harvey@dep  
.state.fl.us>

03/27/2008 10:48  
AM

To  
"G. Dwain Waters, Q.E.P., Gulf  
Power Company"  
<gdwaters@southernco.com>,  
"Gregory N. Terry, P.E., Gulf  
Power Company"  
<gnterry@southernco.com>,  
"Bradburn, Rick"  
<Rick.Bradburn@dep.state.fl.us>,  
James Little/R4/USEPA/US@EPA,  
Kathleen Forney/R4/USEPA/US@EPA  
cc  
"Holtom, Jonathan"  
<Jonathan.Holtom@dep.state.fl.us>  
, "Walker, Elizabeth \ (AIR\)"  
<Elizabeth.Walker@dep.state.fl.us  
>, "Gibson, Victoria"  
<Victoria.Gibson@dep.state.fl.us>  
Subject  
Gulf Power Company - SMITH -  
Facility #0050014-013-AC-FINAL

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.

One Energy Place  
Pensacola, Florida 32520

850.505.5111

RECEIVED

MAR 18 2008

BUREAU OF AIR REGULATION

Certified Mail



March 7, 2008

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

Dear Mr.Holtom:

RE: LANSING SMITH ELECTRIC GENERATION FACILITY  
DEP File No. 0050014-013-AC  
Smith SNCR Air Construction Permit - Public Notice Affidavit

Thanks for the quick response to Gulf Power's request for an air construction permit to install SNCRs at the Lansing Smith Electric Generating Facility. Enclosed is the proof of publication, i.e., newspaper affidavit regarding the Public Notice of Intent to Issue An Air Construction Permit originally received by Gulf Power on February 28, 2008. The notice was published on March 4, 2008 in the Panama City News Herald.

Please let me know if you have any questions regarding this matter and if you receive any public comments regarding our request.

Sincerely,

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

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

Cc: Greg Terry, Gulf Power Company  
Marie Largilliere, Gulf Power Company  
Cedric Estelle, Gulf Power Company  
Chip Wilson, Southern Company  
Rick Bardburn, FDEP, Northwest District

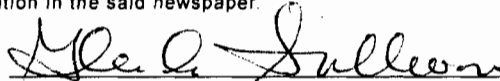
# Florida Freedom Newspapers, Inc.

PUBLISHERS OF THE NEWS HERALD  
Panama City, Bay County, Florida  
Published Daily

## State of Florida County of Bay

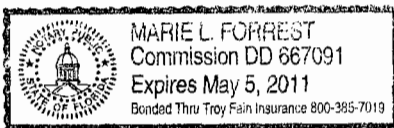
Before the undersigned authority appeared Glenda Sullivan, who on oath says that she is Classified In-Column Manager of The News Herald, a daily newspaper published at Panama City, in Bay County, Florida; that the attached copy of advertisement, being a Legal Advertisement - #6724 in the matter of Notice of Intent Issue Air Permit in the Bay County Court, was published in said newspaper in the issue of March 4, 2008

Affiant further says that The News Herald is a direct successor of the Panama City News and that this publication, together with its direct predecessor, has been continuously published in said Bay County, Florida, each day (except that the predecessor, Panama City News, was not published on Sundays), and that this publication together with its said predecessor, has been entered as periodicals matter at the post office in Panama City, in said Bay County, Florida, for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that he or she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



State of Florida  
County of Bay

Sworn and subscribed before me this 4th day of March, A.D., 2008, by Glenda Sullivan, Classified In-Column Manager of The News Herald, who is personally known to me or has produced N/A as identification.



Notary Public, State of Florida at Large

### 6724 PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection  
Bureau of Air Regulation  
Draft Air Permit No. 0050014-013-AC  
Gulf Power Company  
Smith Electric Generating Plant  
Bay County

**Applicant:** The applicant for this project is Gulf Power Company, One Energy Place, Pensacola, Florida, 32520. The applicant's authorized representative is G. Dwan Waters, Q.E.P., Air Quality Programs Supervisor.

**Facility Location:** The applicant operates the existing Lansing Smith Electric Generating Plant, which is located at 4300 County Road 2300, Lynne Haven, Bay County, Florida.

**Project:** The applicant proposes to install a selective non-catalytic reduction (SNCR) system on Units 1 & 2 for the purpose of reducing nitrogen oxide (NOX) emissions from the facility as part of the plant's strategy to comply with the requirements of the Clean Air Interstate Rule (CAIR). The project is not expected to result in any significant increases of collateral pollutants.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination regarding this project. The Permitting Authority's physical address is 111 South Magnolia Drive, Tallahassee, Florida 32301. The Permitting Authority's mailing address is 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m. Monday through Friday (except legal holidays) at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding, and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of when and how each petitioner received notice of the

ect; review engineer for additional information at the address or phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/products/apds/default.asp>.

**Notice of Intent to Issue**

**Air Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

(d) A statement of undisputed issues of material fact; if there are none, the petition must so state.

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action.

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and.

(g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.



Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.  
March 4, 2008

# Memorandum

# Florida Department of Environmental Protection

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TO: Trina Vielhauer, Chief - Bureau of Air Regulation  
THROUGH: Jeff Koerner, New Source Review Section   
FROM: Jonathan Holtom, New Source Review Section   
DATE: 2/27/08  
SUBJECT: Draft Air Construction Permit No. 0050014-013-AC  
Gulf Power Company, Smith Electric Generating Plant  
SNCR System for Units 1 and 2

Attached for your review are the following items:

- Intent to Issue AC Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Draft AC Permit;
- P.E. Certification;

The P.E. certification briefly summarizes the proposed permit project. The Technical Evaluation and Preliminary Determination provide a detailed description of the project, rationale, and conclusion. I recommend your approval of the attached Draft Permit for this project.

Attachments



# 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

February 27, 2008

Mr. G. Dwain Waters, Q.E.P.  
Air Quality Programs Supervisor  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520

Re: Air Construction Permit No. 0050014-013-AC  
Gulf Power Company- Smith Electric Generating Plant  
Units 1 and 2 SNCR Project

Dear Mr. Waters:

On January 11, you submitted an application for an air permit to install a selective non-catalytic reduction (SNCR) system on Units 1 and 2 for the purpose of reducing nitrogen oxide (NO<sub>x</sub>) emissions as part of the plant's strategy to comply with the requirements of the Clean Air Interstate Rule (CAIR). The equipment will be installed at the Lansing Smith Electric Generating Plant, which is located at 4300 County Road 2300, Lynne Haven, Bay County, Florida. Enclosed are the following documents: "Technical Evaluation and Preliminary Determination", "Draft Permit", "Written Notice of Intent to Issue Air Permit", and "Public Notice of Intent to Issue Air Permit".

The "Technical Evaluation and Preliminary Determination" summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft Permit. The proposed "Draft Permit" includes the specific conditions that regulate the emissions units covered by the proposed project. The "Written Notice of Intent to Issue Air Permit" provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation. The "Public Notice of Intent to Issue Air Permit" is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Jonathan Holtom, P.E., at (850) 921-9531.

Sincerely,

Trina L. Vielhauer, Chief  
Bureau of Air Regulation

TLV/jfk/jh

Enclosures



## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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*In the Matter of an  
Application for Air Permit by:*

Mr. G. Dwain Waters, Q.E.P.  
Air Quality Programs Supervisor  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520

Draft Air Permit No. 0050014-013-AC  
Smith Electric Generating Plant  
Units 1 & 2 SNCR Project  
Bay County, Florida

**Facility Location:** The applicant operates the existing Lansing Smith Electric Generating Plant, which is located at 4300 County Road 2300, Lynne Haven, Bay County, Florida.

**Project:** The applicant proposes to install an SNCR system on Units 1 & 2. Details of the project are provided in the application and the enclosed "Technical Evaluation and Preliminary Determination".

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Department of Environmental Protection is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 S. Magnolia Drive, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Air Permit" (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven (7) days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of the Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

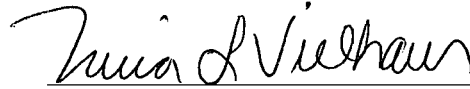
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

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Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief  
Bureau of Air Regulation

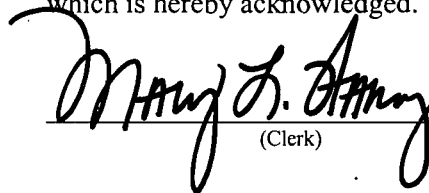
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by electronic mail with received receipt requested before the close of business on 8/28/08 to the persons listed below.

G. Dwain Waters, Q.E.P., Gulf Power Company ([gdwaters@southernco.com](mailto:gdwaters@southernco.com))  
Gregory N. Terry, P.E., Gulf Power Company ([gnterry@southernco.com](mailto:gnterry@southernco.com))  
Rick Bradburn, DEP-NWD ([rick.bradburn@dep.state.fl.us](mailto:rick.bradburn@dep.state.fl.us))  
Jim Little, EPA Region 4 ([little.james@epamail.epa.gov](mailto:little.james@epamail.epa.gov))  
Katy Forney, EPA Region 4 ([forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov))

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



(Clerk)

8/28/08  
(Date)

## **PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT**

Florida Department of Environmental Protection  
Bureau of Air Regulation  
Draft Air Permit No. 0050014-013-AC  
Gulf Power Company – Smith Electric Generating Plant  
Bay County

**Applicant:** The applicant for this project is Gulf Power Company, One Energy Place, Pensacola, Florida 32520. The applicant's authorized representative is G. Dwain Waters, Q.E.P., Air Quality Programs Supervisor.

**Facility Location:** The applicant operates the existing Lansing Smith Electric Generating Plant, which is located at 4300 County Road 2300, Lynne Haven, Bay County, Florida.

**Project:** The applicant proposes to install a selective non-catalytic reduction (SNCR) system on Units 1 & 2 for the purpose of reducing nitrogen oxide (NO<sub>x</sub>) emissions from the facility as part of the plant's strategy to comply with the requirements of the Clean Air Interstate Rule (CAIR). The project is not expected to result in any significant increases of collateral pollutants.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination regarding this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition

**(Public Notice to be Published in the Newspaper)**

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.

**PROFESSIONAL ENGINEER CERTIFICATION STATEMENT**

**PERMITTEE**

Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0328

Draft Air Permit No. 0050014-013-AC  
Smith Electric Generating Plant  
Units 1 & 2 SNCR Project  
Bay County, Florida

**PROJECT DESCRIPTION**

**Project:** On January 11, 2008, Gulf Power Company submitted an application requesting authorization to install selective non-catalytic reduction (SNCR) technology on the existing Units 1 and 2 at the Lansing Smith Electric Generating Plant, as part of the plant's strategy to comply with CAIR and CAMR regulations. The SNCR system will be a High Energy Reagent Technology (HERT) system which will inject a fine urea mist into a high energy air stream. The air stream will evaporate the mist and mix it with the combustion flue gas in the boiler for reduction of nitrogen oxides (NO<sub>x</sub>).

*I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*



Jonathan Holtom  
Jonathan Holtom, P.E.  
Registration Number: 52664

2/27/08  
(Date)

**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**PROJECT**

Draft Air Construction Permit No. 0050014-013-AC  
Smith Units 1 & 2 SNCR Project

**COUNTY**

Bay County

**APPLICANT**

Gulf Power Company  
Lansing Smith Electric Generating Plant  
ARMS Facility ID No. 0050014

**PERMITTING  
AUTHORITY**

Florida Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
New Source Review Section



February 27, 2008

*{Filename: Smith 1&2 SNCR TEPD}*

**TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

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**1. GENERAL PROJECT INFORMATION**

**Applicant Name and Address**

Gulf Power Company – Smith Electric Generating Plant  
One Energy Place  
Pensacola, FL 32520-0329

*Authorized Representative:*

G. Dwain Waters, Q.E.P.

**Processing Schedule**

01/11/08 Received the application for a pollution control project.

**Facility Description and Location**

Gulf Power Company operates the existing Lansing Smith Electric Generating Plant, which is located at 4300 County Road 2300, Lynne Haven, Bay County, Florida. This site is in an area that is currently in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS).

**Standard Industrial Classification Code (SIC)**

SIC No. 4911 – Electrical Services

**Regulatory Categories**

Title III: The existing facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The existing facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, Florida Administrative Code (F.A.C.)

PSD: The existing facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

**Project Description**

On January 11, 2008, Gulf Power Company submitted an application requesting authority to install selective non-catalytic reduction (SNCR) technology on the existing Units 1 and 2 at the Lansing Smith Electric Generating Plant, as part of the plant's strategy to comply with the requirements of the Clean Air Interstate Rule (CAIR) and the Clean Air Mercury Rule (CAMR). The SNCR system will be a High Energy Reagent Technology (HERT) system which will inject a fine urea mist into a high energy air stream. The air stream will evaporate the mist and mix it with the combustion flue gas in the boiler for reduction of nitrogen oxides (NO<sub>x</sub>).

**2. APPLICABLE REGULATIONS**

**State Regulations**

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code. In general, this project is subject to the applicable rules and regulations defined in the following Chapters of the F.A.C.

Chapter    Description

62-4        Permitting Requirements

62-204     Ambient Air Quality Requirements and Federal Regulations Adopted by Reference



## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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- 62-210 Required Permits, Public Notice, Reports, Circumvention, Excess Emissions, and Forms
- 62-212 Preconstruction Review
- 62-213 Operation Permits for Major Sources of Air Pollution
- 62-296 Emission Limiting Standards
- 62-297 Testing, Continuous Monitoring, and Alternate Sampling Procedures

The project is not subject to Florida's Power Plant Siting Act because there will be no change in steam-generated electrical capacity.

### General PSD Applicability

The Department regulates major air pollution sources in accordance with the Prevention of Significant Deterioration (PSD) program. A PSD review is required only in areas currently in attainment with the National Ambient Air Quality Standard (NAAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant, or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories (Rule 62-210.200, F.A.C., definitions), or
- 5 tons per year of lead.

For new projects at PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates listed in Rule 62-210.200, F.A.C. (definitions). Pollutant emissions from the project exceeding these rates are considered "significant". The applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

### PSD Applicability for Project

The project is not expected to result in, nor does it authorize, an increase in the capacity utilization of Units 1 and 2; and, uncontrolled representative actual emissions are not expected to be any different than past actual emissions. The Department believes that the proposed NO<sub>x</sub> reduction project will be environmentally beneficial and will not result in a significant net increase in projected actual annual emissions of any criteria pollutant. As such, this project is exempt from the requirements of PSD preconstruction review. Nevertheless, an air construction permit is required to conduct the proposed work.

### 3. APPLICATION REVIEW

Smith Unit 1 (ARMS Emissions Unit -001) is a 175 megawatt (MW) tangentially-fired, dry bottom boiler. The maximum heat input rate is 1,944.8 MMBtu per hour while combusting the primary fuel of pulverized coal. Distillate oil is also combusted for periods of start-up and flame stabilization. Smith Unit 2 (ARMS Emissions Unit -002) is a 205 MW tangentially fired, dry bottom boiler. The maximum heat input rate is 2,246.2 MMBtu per hour while combusting the primary fuel of pulverized coal. Distillate oil is also combusted for periods of start-up and flame stabilization. Emissions of particulate matter from Units 1 and 2 are currently reduced by Buell hot-side and General Electric cold side electrostatic precipitators. Nitrogen oxides are controlled with low NO<sub>x</sub> burners. Units 1 and 2 are equipped with duct-mounted continuous monitors for opacity, stack gas flow, carbon dioxide, nitrogen oxides, and sulfur dioxide. Units 1 and 2 share a common stack that is 18 feet in diameter and 199 feet high. Based on the current Title V air operation permit, Units 1 and 2 are subject to Rule 62-296.405,

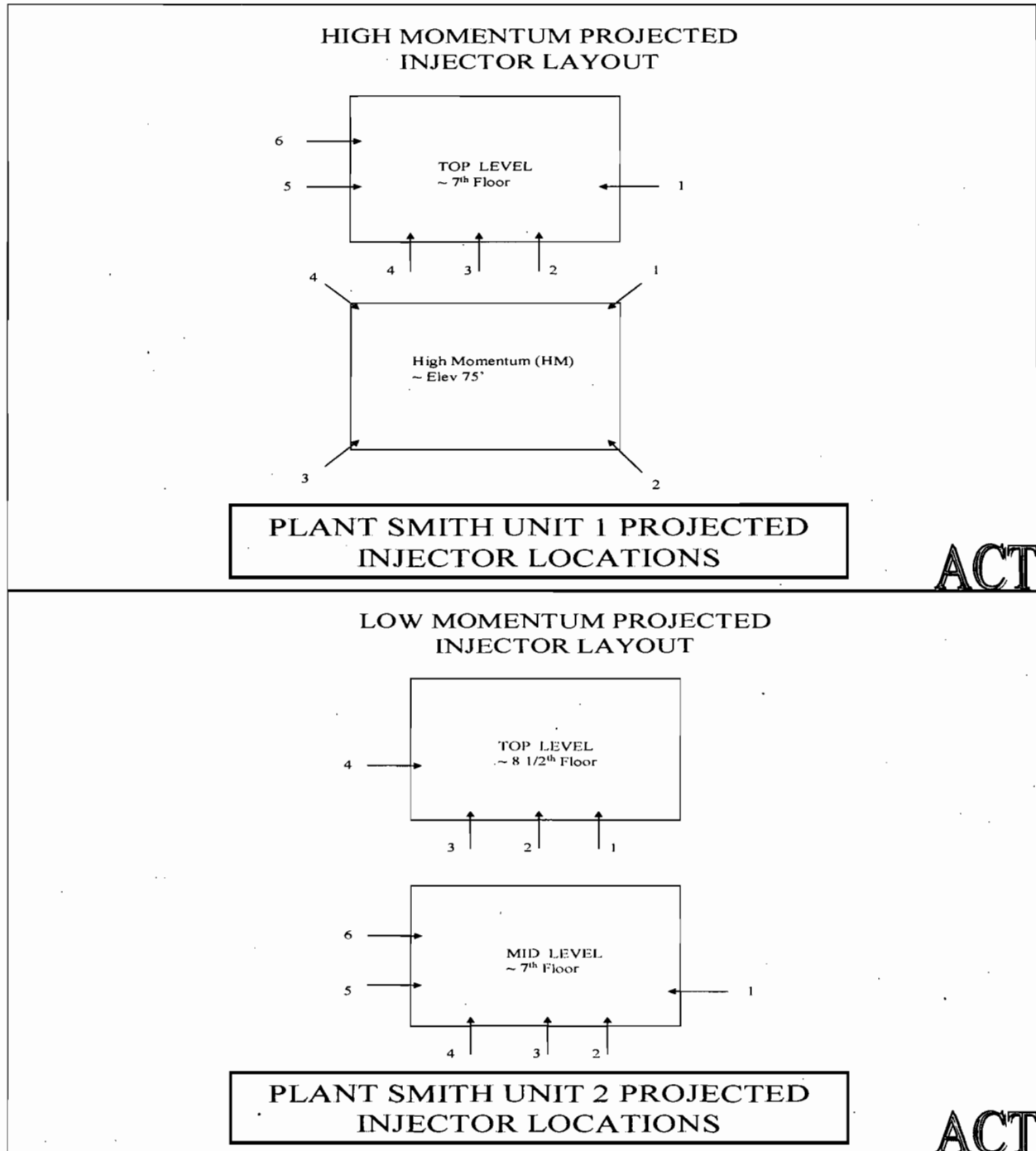
## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

F.A.C. (Fossil Fuel Fired Steam Generators > 250 MMBtu/Hour Heat Input), have not undergone PSD Preconstruction Review, and are regulated under Phase II of the federal Acid Rain Program.

The applicant proposes to perform the following work on Units 1 and 2:

### Boiler Parameters

Based on the results of testing authorized by permit number 0050014-012-AC, the projected number and location of injectors to be installed on Units 1 and 2 are shown in the figures below. The final locations will be confirmed upon results from additional model analyses prior to installation.



### Selective Non-Catalytic Reduction (SNCR)

Units 1 and 2 currently use low NO<sub>x</sub> burners to inhibit the formation of NO<sub>x</sub>. Gulf Power Company proposes to add a new HERT SNCR system manufactured by Advanced Combustion Technology (ACT). SNCR is an add-on control technology in which urea is injected into the exhaust gas stream in an area of the duct where the stack gas temperature is in the range of 1,600 – 2,100 °F. The ammonia combines with NO<sub>x</sub> in the gas stream to form nitrogen and water. Ammonia that escapes the stack without reacting with NO<sub>x</sub> is called “ammonia slip”. If a fuel contains significant amounts of sulfur, high levels of ammonia slip can lead to the formation of bisulfates and other particulate matter. To avoid these problems, SNCR systems can be designed with very low levels of ammonia slip (< 5 ppmv) while still achieving control efficiencies in the range of up to 75%. SNCR is a commercially available, demonstrated control technology currently employed on numerous utility boilers and combined cycle gas turbine projects worldwide. Over fired air injection ports will also be added to Unit 1. Unit 2 is already equipped with over fired air technology.

### Design Specifications

The following specifications summarize the preliminary design of the proposed new SNCR system.

- *Basic Design Specifications:* The SNCR system is designed and guaranteed for a maximum NO<sub>x</sub> conversion efficiency of 50% on Unit 1 and 30% on Unit 2 based on an inlet NO<sub>x</sub> emissions rate of 0.47 lb/MMBtu for Unit 1 and 0.36 lb/MMBtu for Unit 2.
- *Urea Storage and Mixing:* Urea will be delivered by truck and stored on site as a 50% aqueous solution in one 45,000 gallon tank. It is expected that the tank will be maintained at about 2/3 capacity to avoid the possibility of an overflow. This will provide enough urea for about 5½ days of operation. The solution will be maintained at a temperature of approximately 90° F by circulating through the SNCR system piping loop heating module.
- *Ammonia Slip:* The SNCR is designed and guaranteed to have a maximum ammonia slip concentration of 5 ppmvd corrected to 3% O<sub>2</sub> (24-hour basis) in the duct cross-sectional area for all boiler loads. There are no provisions for continuously monitoring ammonia concentration in the flue gas. When ammonia measurements in the flue gas are required, a wet chemical method will be utilized. Although not required by this permit, more frequent tracking of ammonia slip will be monitored by measuring the amount of residual ammonia adsorbed by the fly ash. Fly ash samples will be measured periodically using an ion-specific electrode.
- *Urea Injection and Control System:* Using plant service water or other dilution water source, the metering module dilutes the reagent to a predetermined concentration (somewhat less than 30%) and precisely controls the flow of the diluted reagent to distribution modules located near the boiler injection points. The distribution modules provide the final control of diluted reagent and atomizing/cooling (plant) air being delivered to each injector. The diluted reagent is injected into the boiler via wall-mounted air atomizing lances. At peak load for Unit 1, with 0.47 lb/MMBtu inlet NO<sub>x</sub> and 50% reduction, urea injection will be 145 gallons per hour. At peak load for Unit 2, with 0.36 lb/MMBtu inlet NO<sub>x</sub> and 30% reduction, urea injection will be 135 gallons per hour. This translates to an ammonia flow of 391 lb/hr for Unit 1 and 364 lb/hr for Unit 2, on a dry basis.

### SNCR Operation

The SNCR will operate as needed in order to comply with CAIR and CAMR regulations. During these periods, the SNCR will operate whenever the units are operating at or above the normal low load levels. If the units drop below this level, the SNCR system will automatically stop injection until the units return to their low load level. The SNCR system is not required in order to comply with the facility-wide NO<sub>x</sub> emissions cap of 6,666 tons per year (tpy).

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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### Conclusion

While the design specifications will result in NO<sub>x</sub> conversion efficiencies lower than can typically be expected for similar SNCR projects, based on the application, the preliminary design appears capable of achieving the minimum guaranteed NO<sub>x</sub> conversion efficiencies of 50% for Unit 1 and 30% for Unit 2. Gulf Power believes that this lower level of efficiency will be sufficient to comply with the requirements of CAIR and CAMR. The Department agrees that NO<sub>x</sub> emissions will certainly be reduced by the operation of SNCR systems on these units and will provide another strategy for meeting the requirements of CAIR. However, our research has not been able to verify a conclusive relationship between the operation of an SNCR system and an increase in mercury removal efficiencies.

Initial performance testing will be required to demonstrate the operational capabilities of the installed HERT SNCR systems as compared to the design specification to achieve a 50% reduction in the nitrogen oxide emission rate for Unit 1 and 30% for Unit 2. Initial and annual performance testing will be required to demonstrate that the targeted design ammonia slip level of less than 5 ppm is met.

### **4. PRELIMINARY DETERMINATION**

The NO<sub>x</sub> reduction project is based on the design and operation of HERT SNCR air pollution control equipment. This type of air pollution control device is operating successfully on numerous coal-fired utility boilers throughout the world.

The Department makes a preliminary determination that the proposed project will result in a decrease in NO<sub>x</sub> emissions. This determination is based on a technical review of the application, the preliminary design, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jonathan Holtom, P.E., is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

### **REFERENCES**

1. Data Compiled from the Department's ARMS Database
2. EPA's White Paper, "Selective Non-Catalytic Reduction (SNCR) For Controlling NO<sub>x</sub> Emissions", Prepared By: SNCR Committee, Institute Of Clean Air Companies, Inc., May 2000.

**(DRAFT)**

**PERMITTEE**

Gulf Power Company  
One Energy Place  
Pensacola, FL 32520-0328

*Authorized Representative:*

G. Dwain Waters, Q.E.P., Air Quality Programs Supervisor

Smith Electric Generating Plant Units 1 & 2 SNCR Project Facility ID No. 0050014 SIC No. 4911 Air Permit No. 0050014-013-AC Permit Expires: December 31, 2009
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**PROJECT AND LOCATION**

This permit authorizes installation of a selective non-catalytic reduction system for Units 1 and 2 at the existing Lansing Smith Electric Generating Station, which is located 4300 County Road, Lynne Haven, Bay County, Florida. The map coordinates are: Zone 16; 625.05 km East; and 3349.24 km North.

**STATEMENT OF BASIS**

This air pollution construction permit is issued under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department. This air construction permit supplements all other valid air construction and operation permits.

**CONTENTS**

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

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Joseph Kahn, Director  
Division of Air Resource Management

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(Date)

**SECTION 1. GENERAL INFORMATION (DRAFT)**

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**FACILITY AND PROJECT DESCRIPTION**

The existing plant consists of two coal fired steam generators (boilers), two combustion turbines (used to drive two separate peaking generators) driven by a single jet engine, and two gas-fired combined-cycle combustion turbine electrical generators with duct-fired heat recovery steam generators (HRSG). The two boilers are Acid Rain Phase II Units. The two combined-cycle combustion turbines are also Acid Rain units. Pulverized coal is the primary fuel for the boilers. Distillate fuel oil is used to fire the combustion turbine and as a “back-up” fuel for the boilers. The following units are affected by this air construction permit.

<b>ID</b>	<b>Emission Unit Description</b>
-001	Boiler Number 1 - 1,944.8 MMBtu/hour (Phase II Acid Rain Unit)
-002	Boiler Number 2 - 2,246.2 MMBtu/hour (Phase II Acid Rain Unit)

This permit authorizes the installation of High Energy Reagent Technology (HERT) selective non-catalytic reduction (SNCR) systems on Units 1 and 2 to reduce emissions of nitrogen oxides (NO<sub>x</sub>) as part of the plant’s strategy for complying with the Clean Air Interstate Rule (CAIR). Over fired air injection ports will also be added to Unit 1. Unit 2 is already equipped with over fired air technology.

**REGULATORY CLASSIFICATION**

Title III: The existing facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The existing facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

**RELEVANT DOCUMENTS**

The permit application and additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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1. Permitting Authority: All documents related to applications for permits to construct, modify, or operate emissions units at this facility shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all permit applications shall also be sent to the Compliance Authority.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northwest District Office at 160 Governmental Center, Pensacola, Florida 32501-5794.
3. Appendices: The following Appendices are attached as part of this permit: Appendix CF (Citation Format); Appendix GC (General Conditions); and, Appendix SC (Standard Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-4, 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Construction Approval: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Rule 62-210.200(76), F.A.C. defines *construction* as, "The act of performing on-site fabrication, erection, installation or modification of an emissions unit or facility of a permanent nature, including installation of foundations or building supports; laying of underground pipe work or electrical conduit; and fabrication or installation of permanent storage structures, component parts of an emissions unit or facility, associated support equipment, or utility connections. Land clearing and other site preparation activities are not a part of the construction activities." Such permits shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions units. The permittee shall apply for a Title V operation permit (revision) at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

#### Emissions Units 001 & 002

This section of the permit addresses the following existing emissions units:

ID	Emission Unit Description
001	Boiler No. 1 (Phase II Acid Rain Unit)
002	Boiler No. 2 (Phase II Acid Rain Unit)

#### Emissions Unit Nos. 001 & 002

*Description:* Unit 1 is a tangentially fired, dry bottom boiler that began commercial operation on May 12, 1965. Unit 2 is a tangentially fired, dry bottom boiler that began commercial operation on April 9, 1967.

*Fuels:* Coal, new No. 2 fuel oil and/or on-specification used oil (for start-up and flame stabilization), and occasional on-site generated "oil contaminated soil".

*Unit 1 Capacity:* 1,944.8 MMBtu/hour when firing pulverized coal, 153 MMBtu/hr when firing oil.

*Unit 2 Capacity:* 2,246.2 MMBtu/hour when firing pulverized coal, 76 MMBtu/hr when firing oil.

*PM Controls:* Hot-side and cold-side electrostatic precipitators.

*NO<sub>x</sub> Controls:* Low-NO<sub>x</sub> burners and selective non-catalytic reduction (SNCR).

*Continuous Monitors:* Carbon dioxide (CO<sub>2</sub>), NO<sub>x</sub>, sulfur dioxide (SO<sub>2</sub>), opacity, stack gas flow, and urea injection rate.

*Stack Parameters:* Units 1 & 2 share a common stack that is 199 feet tall with a diameter of 18 feet. The volumetric flow rate of Units 1 & 2 combined, at permitted capacity, is approximately 1,567,967 acfm.

*{Permitting Notes: Based on the current Title V air operation permit, Units 1 & 2: are regulated under Rule 62-296.405, F.A.C. (Fossil Fuel Fired Steam Generators > 250 MMBtu/Hour Heat Input); have not undergone PSD Preconstruction Review; and are regulated under Phase II of the federal Acid Rain Program (40 CFR 75).}*

#### PREVIOUS APPLICABLE REQUIREMENTS

1. Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for these emissions units. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070, F.A.C.]

#### EQUIPMENT AND CONSTRUCTION

2. Selective Non-Catalytic Reduction (SNCR) System: The permittee is authorized to construct, tune, operate, and maintain a new HERT SNCR system for Units 1 & 2 to reduce emissions of NO<sub>x</sub> as described in the application, approved drawings, plans, and other documents on file with the Department. The minimum manufacturer's guaranteed NO<sub>x</sub> conversion efficiency for Unit 1 is 50% and the minimum manufacturers guaranteed NO<sub>x</sub> conversion efficiency for Unit 2 is 30%, as measured across the SNCR unit inlet and outlet. The designed target ammonia slip level is 5 ppmv based on a 24-hour average. [Design]

*{Permitting Note: Advanced Combustion Technology, Inc. designed the new HERT SNCR system, which will generally consist of the following:*

- **UREA Injection System:** Urea will be delivered by truck and stored on site as a 50% aqueous solution in one 45,000 gallon tank. It is expected that the tank will be maintained at about 2/3 capacity to avoid the possibility of an overflow. This will provide enough urea for about 5½ days of operation. The solution will be maintained at a temperature of approximately 90° F by circulating through the SNCR system piping loop heating module. Using plant service water or other dilution water source, the



## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

### Emissions Units 001 & 002

metering module dilutes the reagent to a predetermined concentration (somewhat less than 30%) and precisely controls the flow of the diluted reagent to distribution modules located near the boiler injection point. The distribution modules provide the final control of diluted reagent and atomizing/cooling (plant) air being delivered to each injector. The diluted reagent is injected into the boiler via wall-mounted air atomizing lances, which will be installed in the upper levels of the boiler at locations to be determined by the manufacturer. At peak load, the urea injection rate will be about 145 gallons per hour (gph) for Unit 1 and about 135 gph for Unit 2. This translates to an ammonia flow for Unit 1 of 391 lb/hr and for Unit 2 of 364 lb/hr, on a dry basis.

- **Ammonia Slip:** The SNCR is designed and guaranteed to have a maximum ammonia slip concentration of 5 ppmvd corrected to 3% O<sub>2</sub> (24 hour basis) in the duct cross-sectional area for all boiler loads. There are no provisions for continuously monitoring ammonia concentration in the flue gas. When ammonia measurements in the flue gas are required, a wet chemical method will be utilized. Although not required, more frequent tracking of ammonia slip will be monitored by measuring the amount of residual ammonia adsorbed by the fly ash. Fly ash samples will be measured periodically using an ion-specific electrode.
3. **Updated Designs:** The permittee shall update the Department with final design specifications and any substantial changes made to the final design specifications during the actual construction phase. [Rule 62-4.070(3), F.A.C.]

#### PERFORMANCE REQUIREMENTS

{Permitting Note: The use of the SNCR system is not required to comply with the facility-wide NO<sub>x</sub> emissions cap of 6,666 tons per year. The SNCR will be operated at the owners discretion as part of the plant's strategy to comply with the requirements of the Clean Air Interstate Rule (CAIR).}

#### EMISSIONS PERFORMANCE TESTING

4. **Nitrogen Oxides, Performance Tests:** Within 60 days after completing construction of the SNCR system and bringing Units 1 and 2 back on line, the permittee shall conduct tests to demonstrate the operational capabilities of the installed HERT SNCR system as compared to the design specification to achieve a 50% reduction in the nitrogen oxide emission rate for Unit 1 and 30% for Unit 2. The permittee shall concurrently test the SNCR inlet and SNCR outlet in accordance with EPA Method 7E as adopted by reference in Rule 62-204.800, F.A.C. Data collected from the NO<sub>x</sub> CEMS may be used to represent NO<sub>x</sub> emissions at the SNCR outlet. The data shall be collected for at least three consecutive hours. The purpose of the tests is to determine the actual installed control capabilities of the SNCR systems. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]
5. **Ammonia Slip, Performance Tests:** Within 60 days after completing construction of the SNCR system and bringing Units 1 and 2 back on line, the permittee shall conduct tests to determine the ammonia slip rate in accordance with EPA Method CTM-027 or other methods approved by EPA. Subsequent tests shall be conducted during each federal fiscal year. If tests show ammonia slip emissions are greater than the design target level specified in Condition No. 2 of this subsection, the permittee shall take corrective actions such as repair, addition of urea injectors for better mixing, addition of mixing vanes in the duct, etc. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

{Permitting Note: EPA Methods 1 (Traverse Points), 2 (Velocity and Flow Rate), 3 (Gas Analysis), 4 (Moisture Content), and 19 (Calculating Emission Rates, Use of F-Factors) may also be used to supplement the required test methods.}

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

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#### Emissions Units 001 & 002

#### CONTINUOUS MONITORING REQUIREMENTS

*{Permitting Note: In accordance with the federal Acid Rain requirements, the following continuous monitors are installed on these units: SO<sub>2</sub>, NO<sub>x</sub>, CO<sub>2</sub> and stack gas flow.}*

6. SNCR Urea Injection Rate Monitor: In accordance with the manufacturer's specifications, the permittee shall install, calibrate, operate and maintain a flow meter to measure and record the urea injection rate for the SNCR system. [Rules 62-4.070(3) and 62-212.400(5)(c), F.A.C.]

#### RECORDS AND REPORTS

7. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the provisions of Rule 62-297.310(8), F.A.C. For each required test run, the report shall indicate the actual heat input rate (MMBtu/hour), the NO<sub>x</sub> emission rate (lb/MMBtu) as recorded by the CEMS, and the urea injection rate (lb/hour). The report shall also include copies of the continuous monitoring records for the NO<sub>x</sub> emissions. [Rule 62-297.310(8), F.A.C.]

**SECTION 4. APPENDICES (DRAFT)**

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**C. Appendix SC – Standard Conditions**

Appendix CF - Citation Format;  
Appendix GC - General Conditions;  
Appendix SC - Standard Conditions

**SECTION 4. APPENDIX CF**  
**CITATION FORMATS**

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*The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.*

Old Permit Numbers

*Example:* Permit No. AC50-123456 or Air Permit No. AO50-123456

*Where:* "AC" identifies the permit as an Air Construction Permit  
"AO" identifies the permit as an Air Operation Permit  
"123456" identifies the specific permit project number

New Permit Numbers

*Example:* Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

*Where:* "099" represents the specific county ID number in which the project is located  
"2222" represents the specific facility ID number  
"001" identifies the specific permit project  
"AC" identifies the permit as an air construction permit  
"AF" identifies the permit as a minor federally enforceable state operation permit  
"AO" identifies the permit as a minor source air operation permit  
"AV" identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

*Example:* Permit No. PSD-FL-317

*Where:* "PSD" means issued pursuant to the Prevention of Significant Deterioration of Air Quality  
"FL" means that the permit was issued by the State of Florida  
"317" identifies the specific permit project

Florida Administrative Code (F.A.C.)

*Example:* [Rule 62-213.205, F.A.C.]

*Means:* Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

*Example:* [40 CFR 60.7]

*Means:* Title 40, Part 60, Section 7

**SECTION 4. APPENDIX GC**  
**GENERAL CONDITIONS**

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The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
  - a. Have access to and copy and records that must be kept under the conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of non-compliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73

**SECTION 4. APPENDIX GC**  
**GENERAL CONDITIONS**

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- and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
  11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
  12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
  13. This permit also constitutes:
    - a. Determination of Best Available Control Technology (not applicable to project);
    - b. Determination of Prevention of Significant Deterioration (not applicable to project); and
    - c. Compliance with New Source Performance Standards (not applicable to project).
  14. The permittee shall comply with the following:
    - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
    - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
    - c. Records of monitoring information shall include:
      - 1) The date, exact place, and time of sampling or measurements;
      - 2) The person responsible for performing the sampling or measurements;
      - 3) The dates analyses were performed;
      - 4) The person responsible for performing the analyses;
      - 5) The analytical techniques or methods used; and
      - 6) The results of such analyses.
  15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SECTION 4. APPENDIX SC**  
**STANDARD CONDITIONS**

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Unless otherwise specified by permit or rule, the following conditions apply to all emissions units and activities at this facility.

**EMISSIONS AND CONTROLS**

1. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
2. General Visible Emissions: Unless otherwise specified in the permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. [Rule 62-296.320(4)(b)1, F.A.C.]
3. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

**TESTING REQUIREMENTS**

4. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
5. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
6. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
7. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
  - a. *Required Sampling Time*. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
  - b. *Minimum Sample Volume*. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
  - c. *Calibration of Sampling Equipment*. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

[Rule 62-297.310(4), F.A.C.]

**SECTION 4. APPENDIX SC**  
**STANDARD CONDITIONS**

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8. Determination of Process Variables

- a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

9. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.

10. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]

11. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

12. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.



**SECTION 4. APPENDIX SC**  
**STANDARD CONDITIONS**

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14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

**RECORDS AND REPORTS**

13. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]

**Harvey, Mary**

**From:** Harvey, Mary  
**Sent:** Thursday, February 28, 2008 12:15 PM  
**To:** 'G. Dwain Waters, Q.E.P., Gulf Power Company'; 'Gregory N. Terry, P.E., Gulf Power Company'; Bradburn, Rick; 'Jim Little, EPA Region 4'; 'Katy Forney, EPA Region 4'  
**Cc:** Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Draft Air Construction Permit No. 0050014-013 - Gulf Power Company, Smith Electric Generating PlantDear Sir/Madam:  
**Attachments:** Document - 0050014-013-AC-DRAFT.pdf, Smith 1 & 2 SNCR Appendix draft - 0050014-013-AC-DRAFT.PDF; Smith 1&2 SNCR Draft Permit - 0050014-013-AC-DRAFT.PDF; Smith 1&2 SNCR Intent - 0050014-013-AC-DRAFT.PDF; Smith 1&2 SNCR TEPD - 0050014-013-AC-DRAFT.PDF

Tracking:	Recipient	Delivery	Read
	'G. Dwain Waters, Q.E.P., Gulf Power Company'		
	'Gregory N. Terry, P.E., Gulf Power Company'		
	Bradburn, Rick	Delivered: 2/28/2008 12:15 PM	Read: 2/28/2008 1:21 PM
	'Jim Little, EPA Region 4'		
	'Katy Forney, EPA Region 4'		
	Holtom, Jonathan	Delivered: 2/28/2008 12:15 PM	Read: 2/28/2008 12:39 PM
	Walker, Elizabeth (AIR)	Delivered: 2/28/2008 12:15 PM	
	Gibson, Victoria	Delivered: 2/28/2008 12:15 PM	Read: 2/28/2008 12:20 PM

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,

DEP, Bureau of Air Regulation

3/3/2008

## Harvey, Mary

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**From:** Forney.Kathleen@epamail.epa.gov  
**Sent:** Thursday, February 28, 2008 4:32 PM  
**To:** Harvey, Mary  
**Subject:** Re: Draft Air Construction Permit No. 0050014-013 - Gulf Power Company, Smith Electric Generating PlantDear Sir/Madam:

thanks

-----  
Katy R. Forney  
Air Permits Section  
EPA - Region 4  
61 Forsyth St., SW  
Atlanta, GA 30303

Phone: 404-562-9130  
Fax: 404-562-9019

"Harvey, Mary"  
<Mary.Harvey@dep  
.state.fl.us>

02/28/2008 12:14  
PM

To  
"G. Dwain Waters, Q.E.P., Gulf  
Power Company"  
<gdwaters@southernco.com>,  
"Gregory N. Terry, P.E., Gulf  
Power Company"  
<gnterry@southernco.com>,  
"Bradburn, Rick"  
<Rick.Bradburn@dep.state.fl.us>,  
James Little/R4/USEPA/US@EPA,  
Kathleen Forney/R4/USEPA/US@EPA

cc  
"Holtom, Jonathan"  
<Jonathan.Holtom@dep.state.fl.us>  
, "Walker, Elizabeth \ (AIR\)"  
<Elizabeth.Walker@dep.state.fl.us  
>, "Gibson, Victoria"  
<Victoria.Gibson@dep.state.fl.us>

Subject  
Draft Air Construction Permit No.  
0050014-013 - Gulf Power Company,  
Smith Electric Generating  
PlantDear Sir/Madam:

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).

## Harvey, Mary

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**From:** Terry, Greg N. [GNTERRY@southernco.com]  
**To:** Harvey, Mary  
**Sent:** Thursday, February 28, 2008 6:06 PM  
**Subject:** Read: Draft Air Construction Permit No. 0050014-013 - Gulf Power Company, Smith Electric Generating PlantDear Sir/Madam:

Your message

**To:** GNTERRY@southernco.com  
**Subject:**

was read on 2/28/2008 6:06 PM.

**Harvey, Mary**

**From:** Waters, G. Dwain [GDWATERS@southernco.com]  
**Sent:** Thursday, February 28, 2008 2:40 PM  
**To:** Harvey, Mary  
**Subject:** RE: Draft Air Construction Permit No. 0050014-013 - Gulf Power Company, Smith Electric Generating PlantDear Sir/Madam:

Gulf Power has received the Draft Air Construction Permit No. 0050014-013 - Smith SNCR.  
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) 444-6217  
gdwaters@southernco.com

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Thursday, February 28, 2008 11:15 AM  
**To:** Waters, G. Dwain; Terry, Greg N.; Bradburn, Rick; Jim Little, EPA Region 4; Katy Forney, EPA Region 4  
**Cc:** Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Draft Air Construction Permit No. 0050014-013 - Gulf Power Company, Smith Electric Generating PlantDear Sir/Madam:

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

2/28/2008

## Harvey, Mary

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**From:** Waters, G. Dwain [GDWATERS@southernco.com]  
**To:** undisclosed-recipients  
**Sent:** Thursday, February 28, 2008 2:19 PM  
**Subject:** Read: Draft Air Construction Permit No. 0050014-013 - Gulf Power Company, Smith Electric Generating PlantDear Sir/Madam:

Your message

**To:** GDWATERS@southernco.com  
**Subject:**

was read on 2/28/2008 2:19 PM.

## Harvey, Mary

---

**From:** Bradburn, Rick  
**To:** Harvey, Mary  
**Sent:** Thursday, February 28, 2008 1:21 PM  
**Subject:** Read: Draft Air Construction Permit No. 0050014-013 - Gulf Power Company, Smith Electric Generating PlantDear Sir/Madam:

### Your message

**To:** 'G. Dwain Waters, Q.E.P., Gulf Power Company'; 'Gregory N. Terry, P.E., Gulf Power Company'; Bradburn, Rick; 'Jim Little, EPA Region 4'; 'Katy Forney, EPA Region 4'  
**Cc:** Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Draft Air Construction Permit No. 0050014-013 - Gulf Power Company, Smith Electric Generating PlantDear Sir/Madam:  
**Sent:** 2/28/2008 12:15 PM

was read on 2/28/2008 1:21 PM.

Department of  
Environmental Protection  
Division of Air Resource Management

**SUBMITTED APPLICATION REPORT  
APPLICATION FOR AIR PERMIT - LONG FORM**

--- Form Effective 02/02/06 ---

Application Number: 1805- 1

Application Name: SMITH SNCR CONSTRUCTION PERMIT

Date Submitted: 11 January 2008

**I. APPLICATION INFORMATION**

**Air Construction Permit** - Use this form to apply for any air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

**Air Operation Permit** - Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

**Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option)** - Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

**To ensure accuracy, please see form instructions.**

**Identification of Facility**

1. Facility Owner/Company Name: GULF POWER COMPANY	
2. Site Name: LANSING SMITH PLANT	
3. Facility Identification Number: 0050014	
4. Facility Location...	
Street Address or Other Locator:	4300 COUNTY ROAD 2300
	4300 COUNTY ROAD 2300
City: LYNN HAVEN	County: BAY                      Zip Code: 32409
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility <input type="checkbox"/> Yes <input type="checkbox"/> No



**Application Contact**

1.	Application Contact Name: GLENN WATERS	Application Contact Job Title: Special Projects & Environmental Assets Coordinator
2.	Application Contact Mailing Address... Organization/Firm: GULF POWER COMPANY Street Address: ONE ENERGY PLACE City: PENSACOLA	State: FL Zip Code: 32520-0328
3.	Application Contact Telephone Numbers... Telephone: (850) 444-6527 ext.	Fax: (850) 444-6217
4.	Application Contact Email Address: gdwaters@southernco.com	

**Purpose of Application****This application for air permit is submitted to obtain: (Check one)****Air Construction Permit**

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

**Air Operation Permit**

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit****(Concurrent Processing)**

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

**Application Comment**

Lansing Smith is preparing to install Selective Non-Catalytic Reduction (SNCR) technology on Units 1 and 2 to comply with CAIR and CAMR regulations. SNCR construction is expected to begin on April 4, 2008. The projected startup date for this project is January, 2009. The Smith SNCR systems will be operated on an 'as needed' basis to meet CAIR and CAMR. The project is expected to reduce NOx emissions. There will be no increase in emissions and thus an emission analysis is not necessary for PSD or NSR applicability.



**Scope of Application**

<b>Emissions Unit ID Number</b>	<b>Description of Emissions Unit</b>	<b>Air Permit Type</b>
2	BOILER NUMBER 2 - 2,246.2 MMBTU/HOUR (PHASE II ACID RAIN)	AC1B
1	BOILER NUMBER 1 - 1,944.8 MMBTU/HOUR (PHASE II ACID RAIN)	AC1B

*Note: The fee calculation information associated with this application may be accessed from the Main Menu of ESPAP.*

**Owner/Authorized Representative Statement****Complete if applying for an air construction permit or an initial FESOP.**

1.	Owner/Authorized Representative Name: GLENN WATERS	Owner/Authorized Representative Job Title: Special Projects and Environmental Assets Coordinator
2.	Owner/Authorized Representative Mailing Address... Organization/Firm: GULF POWER Street Address: ONE ENERGY PLACE City: PENSACOLA State: FL Zip Code: 32520-0329	
3.	Owner/Authorized Representative Telephone Numbers... Telephone: (850) 444-6527 ext. Fax:	
4.	Owner/Authorized Representative Email Address: GDWATERS@SOUTHERNCO.COM	
5.	<p>Owner/Authorized Representative Statement:</p> <p>By entering my PIN below, I certify that I am the owner/authorized representative of the facility 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 requirements identified in this application to which the facility 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.</p>	

**Application Responsible Official Certification**

1.	Application Responsible Official Name: THEODORE MCCULLOUGH
2.	Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> 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. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3.	Application Responsible Official Mailing Address... Organization/Firm: GULF POWER 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)444-6744
5.	Application Responsible Official Email Address: TJMCCULL@southernco.com

**Professional Engineer Certification**

1.	Professional Engineer Name: GREGORY TERRY Registration Number: 52786	Professional Engineer Job Title: Air Quality Programs Team Leader
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:	
4.	Professional Engineer Email Address: GNTERRY@SOUTHERNCO.COM	
5.	Professional Engineer Statement:  I hereby certify, except as particularly noted herein*, that:  (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  (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.  (3) If the purpose of this application is to obtain a Title V air operation permit (check here <input 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.  (4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" 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.  (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.

\* Explain any exception to the certification statement.

Professional Engineer Exception Statement:





Telephone: (850) 444-6383 ext. Fax: (850) 444-6744

4. Facility Primary Responsible Official Email Address: TJMCCULL@southernco.com

**Facility Regulatory Classifications** Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1.	<input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2.	<input type="checkbox"/> Synthetic Non-Title V Source	
3.	<input checked="" type="checkbox"/> Title V Source	
4.	<input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5.	<input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6.	<input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7.	<input type="checkbox"/> Synthetic Minor Source of HAPs	
8.	<input type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9.	<input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10.	<input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11.	<input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12.	Facility Regulatory Classifications Comment:	

**List of Pollutants Emitted by Facility**

1. Pollutants Emitted	2. Pollutant Classification	Emissions Cap [Y or N]?
NOX	(A) ACTUAL OR POTENTIAL EMISSIONS ARE ABOVE THE APPLICABLE MAJOR SOURCE THRESHOLDS.	Y
PM	(A) ACTUAL OR POTENTIAL EMISSIONS ARE ABOVE THE APPLICABLE MAJOR SOURCE THRESHOLDS.	N
CO	(A) ACTUAL OR POTENTIAL EMISSIONS ARE ABOVE THE APPLICABLE MAJOR SOURCE THRESHOLDS.	N
SO2	(A) ACTUAL OR POTENTIAL EMISSIONS ARE ABOVE THE APPLICABLE MAJOR SOURCE THRESHOLDS.	N
PM10	(A) ACTUAL OR POTENTIAL EMISSIONS ARE ABOVE THE APPLICABLE MAJOR SOURCE THRESHOLDS.	N
VOC	(B) ACTUAL AND POTENTIAL EMISSIONS BELOW ALL APPLICABLE MAJOR SOURCE THRESHOLDS	N
PB	(B) ACTUAL AND POTENTIAL EMISSIONS BELOW ALL APPLICABLE MAJOR SOURCE THRESHOLDS	N
H107	(C) CLASS IS UNKNOWN	N
H106	(C) CLASS IS UNKNOWN	N
HAPS	(C) CLASS IS UNKNOWN	N
SAM	(C) CLASS IS UNKNOWN	N
TH	(C) CLASS IS UNKNOWN	N
H150	(C) CLASS IS UNKNOWN	N
H046	(C) CLASS IS UNKNOWN	N
H027	(C) CLASS IS UNKNOWN	N
H015	(C) CLASS IS UNKNOWN	N

**B. Emissions Caps**

**Facility-Wide or Multi-Unit Emissions Caps**

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
NOX	Yes	All		6666	OTHER
<p>7. Facility-Wide or Multi-Unit Emissions Cap Comment:                      NOX: Plant Smith has a NOx emissions cap of 6666 tons/year as a result for PSD offset for Smith Units 4&amp;5 when they were constructed.</p>					

### C. FACILITY ADDITIONAL INFORMATION

#### Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
<input type="checkbox"/> Applicable <input checked="" type="checkbox"/> Previously Submitted, Date: 22-JUN-04 <input type="checkbox"/> Attachment
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
<input type="checkbox"/> Applicable <input checked="" type="checkbox"/> Previously Submitted, Date: 22-JUN-04 <input type="checkbox"/> Attachment
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
<input type="checkbox"/> Applicable <input checked="" type="checkbox"/> Previously Submitted, Date: 22-JUN-04 <input type="checkbox"/> Attachment

#### Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: (Not applicable for existing permitted facility)
<input type="checkbox"/> Applicable <input type="checkbox"/> Attachment
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL):
<input type="checkbox"/> Applicable <input type="checkbox"/> Attachment
3. Rule Applicability Analysis:
<input checked="" type="checkbox"/> Applicable <input checked="" type="checkbox"/> Attachment
4. List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): (Not applicable if no exempt units at facility)
<input type="checkbox"/> Applicable <input type="checkbox"/> Attachment
5. Fugitive Emissions Identification:
<input type="checkbox"/> Applicable <input type="checkbox"/> Attachment
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.):
<input type="checkbox"/> Applicable <input type="checkbox"/> Attachment
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.):
<input type="checkbox"/> Applicable <input type="checkbox"/> Attachment
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.):
<input type="checkbox"/> Applicable <input type="checkbox"/> Attachment
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.):
<input type="checkbox"/> Applicable <input type="checkbox"/> Attachment
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):
<input type="checkbox"/> Applicable <input type="checkbox"/> Attachment

**Additional Requirements for FESOP Applications**

<p>1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): (Not applicable if no exempt units at facility)</p> <p><input type="checkbox"/> Applicable <span style="float: right;"><input type="checkbox"/> Attachment</span></p>
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**Additional Requirements for Title V Air Operation Permit Applications**

<p>1. List of Insignificant Activities: (Required for initial/renewal applications, but not for revision applications)</p> <p><input type="checkbox"/> Applicable <span style="float: right;"><input type="checkbox"/> Attachment</span></p>
<p>2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):</p> <p><input type="checkbox"/> Applicable <span style="float: right;"><input type="checkbox"/> Attachment</span></p>
<p>3. Compliance Report and Plan: (Required for all initial/revision/renewal applications):                  Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.</p> <p><input type="checkbox"/> Applicable <span style="float: right;"><input type="checkbox"/> Attachment</span></p>
<p>4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):</p> <p><input type="checkbox"/> Applicable    <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed    <input type="checkbox"/> Attachment</p>
<p>5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only):</p> <p><input type="checkbox"/> Applicable <span style="float: right;"><input type="checkbox"/> Attachment</span></p>
<p>6. Requested Changes to Current Title V Air Operation Permit:</p> <p><input type="checkbox"/> Applicable <span style="float: right;"><input type="checkbox"/> Attachment</span></p>

**Other Information Regarding this Facility:**

<p>4. Other Facility Information:</p> <p><input type="checkbox"/> Included <span style="float: right;"><input type="checkbox"/> Attachment</span></p>
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**Additional Requirements Comment**

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**Facility Attachments**

Supplemental Item	Electronic File Name	Attachment Description	Electronic Document	Date Uploaded
Rule Applicability Analysis	DOCS-#262695-v1-Smith_Facility_list_-_FDEP.DOC	State applicable rule list.	Yes	01/09/2008
	DOCS-#262692-v1-Smith_Facility_list_-_EPA .DOC	Federal applicable rule list.	Yes	01/09/2008





**III. EMISSIONS UNIT INFORMATION**  
**A. GENERAL EMISSIONS UNIT INFORMATION**

**Title V Air Operation Permit Emissions Unit Classification**

1. (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

**Emissions Unit Description and Status**

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:  
 BOILER NUMBER 1 - 1,944.8 MMBTU/HOUR (PHASE II ACID RAIN)

3. Emissions Unit Identification Number: 1

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 11-MAY-65	7. Emissions Unit Major Group SIC Code: 49	8. Acid Rain Unit? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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9. Package Unit Manufacturer: \_\_\_\_\_ Model Number: \_\_\_\_\_

10. Generator Nameplate Rating: 175 MW

11. Emissions Unit Comment:  
 Units -001 and -002 share a common stack

**Emissions Unit Control Equipment**

Code	Equipment	Description
10	ELECTROSTATIC PRECIPITATOR HIGH EFFICIENCY (95.0-99.9%)	Hot Precipitator Buell Model #BAL 2X34N333-4-3P and Cold Precipitator General Electric Model #BE1.2X21(12)30-1.5-1.5-4.2P
205	LOW NOX BURNERS	Low Nox Burner Tips capable of 25% Nox Reduction.
107	SELECTIVE NONCATALYTIC REDUCTION FOR NOX	SNCR HERT Technology projected for startup in January, 2009.

**B. EMISSIONS UNIT CAPACITY INFORMATION**

(Optional for unregulated emissions units.)

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Process or Throughput Rate:		
2. Maximum Production Rate:		
3. Maximum Heat Input Rate:	1944.8 million Btu/hr	
4. Maximum Incineration Rate:	pounds/hr	
	tons/day	
5. Requested Maximum Operating Schedule:	24 hours/day	7 days/week
	52 weeks/year	8760 hours/year
6. Operating Capacity/Schedule Comment:	Coal. 153 mmBtu/hr for #2 fuel oil and "on-spec" used oil. Compliance by fuel records.	

**C. EMISSION POINT (STACK/VENT) INFORMATION**  
 (Optional for unregulated emissions units.)

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram:	2. Emission Point Type Code: 2 - An emission point serving 2 or more EU's capable of simultaneous operation	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: • 2 - BOILER NUMBER 2 - 2,246.2 MMBTU/HOUR (PHASE II ACID RAIN)		
5. Discharge Type Code: (V) A STACK WITH AN UNOBSTRUCTED OPENING DISCHARGING IN A VERTICAL/NEARLY VERTICAL DIRECTION	6. Stack Height: 199 feet	7. Exit Diameter: 18 feet
8. Exit Temperature: 334° F.	9. Actual Volumetric Flow Rate: 1568308 acfm	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: 16      East (km): 625.053 North (km): 3349.243	14. Emission Point Latitude/Longitude... Latitude: 30° 16' 6.2" N Longitude: 85° 41' 59.8" W	
15. Emission Point Comment: Units -001 and -002 share a common stack. Flow rate above for both units.		

**D. SEGMENT (PROCESS/FUEL) INFORMATION**

**Segment Description and Rate:** Segment 1 of 3

1. Segment Description (Process/Fuel Type): Boiler fired with Pulverized Bituminous Coal. Emissions related to tons burned.		
2. Source Classification Code (SCC): 10100212	3. SCC Units: Tons Bituminous Coal Burned	
4. Maximum Hourly Rate: 81.03	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 3	8. Maximum % Ash: 14.4	9. Million Btu per SCC Unit: 24
10. Segment Comment: Minimum MBTU per SCC unit is 23. Average MBTU is 24 and annual based on permitted rate. Max % sulfur based on 12,700 btu/lb coal.		
Is this a valid segment? Yes		

**Segment Description and Rate:** Segment 2 of 3

1. Segment Description (Process/Fuel Type): Boiler fired with #2 fuel oil and `on spec.` used oil. Emissions related to thousand gallons burned.		
2. Source Classification Code (SCC): 10100501	3. SCC Units: 1000 Gallons Distillate Oil (No. 1 & 2) Burned	
4. Maximum Hourly Rate: 1.11	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: .5	8. Maximum % Ash:	9. Million Btu per SCC Unit: 138
10. Segment Comment: The maximum % Ash is approximately 0.05 %. Item 8 above will not accept low % number.		
Is this a valid segment? Yes		

**Segment Description and Rate: Segment 3 of 3**

1. Segment Description (Process/Fuel Type): Waste Oil		
2. Source Classification Code (SCC): 10101302	3. SCC Units: 1000 Gallons Waste Oil Burned	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 132
10. Segment Comment: Used oil specification: Arsenic 5 PPM, Cadmium 2 PPM, Chromium 10 PPM, Lead 100 PPM, Total Halogens 1000 PPM, PCB50 ppm.		
Is this a valid segment? Yes		

**E. EMISSIONS UNIT POLLUTANTS****List of Pollutants Emitted by Emissions Unit**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code	Valid?
CO			NS	Yes
H015			EL	Yes
H027			EL	Yes
H046			EL	Yes
H106				Yes
H107				Yes
H150			EL	Yes
HAPS				Yes
NOX	NSCR (NON-SELECTIVE CATALYTIC REDUCTION)	LOW NOX BURNERS	EL	Yes
PB			EL	Yes
PM	ELECTROSTATIC PRECIPITATOR HIGH EFFICIENCY (95.0-99.9%)		EL	Yes
PM10	ELECTROSTATIC PRECIPITATOR HIGH EFFICIENCY (95.0-99.9%)		NS	Yes
SO2			EL	Yes
VOC				Yes



**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

**(Optional for unregulated emissions units.)**

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: CO - Carbon Monoxide		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 40.5 lb/hour 177.4 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: .5 LB/TON Reference: AP-42		7. Emissions Method Code: (3) CALCULATED USING EMISSION FACTOR FROM AP-42/FIRE SYSTEM.	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Emission factor = 0.5 CO lbs/ton of coal: 0.50 (81.03 tons/hr) = 40.5 CO lbs/hr 0.50 (81.03) (8760) (1/2000) = 177.4 CO tons/hr			
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Source; AP-42			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*



**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**  
 (Optional for unregulated emissions units.)

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: H027 - Cadmium Compounds		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour _____ tons/year _____		4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year _____			
6. Emission Factor:  Reference:		7. Emissions Method Code:	
8.a. Baseline Actual Emissions (if required): _____ tons/year		8.b. Baseline 24-month Period: From: _____ To: _____	
9.a. Projected Actual Emissions (if required): _____ tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:			
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Limited to 2 ppm as specification of used oil.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**  
(Optional for unregulated emissions units.)

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: H046 - Chromium Compounds	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From:                      To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years
10. Calculation of Emissions:	
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Limited to 10 ppm as specification of used oil.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*



**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

**(Optional for unregulated emissions units.)**

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: H106 - Hydrogen chloride (Hydrochloric acid)		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor:  Reference:		7. Emissions Method Code:	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From:                      To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:			
11. Pollutant Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS  
 (Optional for unregulated emissions units.)**

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: H107 - Hydrogen fluoride (Hydrofluoric acid)		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour <span style="float: right;">tons/year</span>		4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor:  Reference:		7. Emissions Method Code:	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: <span style="float: right;">To:</span>	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:			
11. Pollutant Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit.**

**Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: H150 - Polychlorinated biphenyls (Aroclors)	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor:  Reference:	7. Emissions Method Code:
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years
10. Calculation of Emissions:	
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Limited to 50 ppm as specification of used oil.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**  
 (Optional for unregulated emissions units.)

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: HAPS - Total Hazardous Air Pollutants	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour <span style="float:right">tons/year</span>	4. Synthetically Limited? <input type="checkbox"/> Yes <span style="margin-left: 100px;"><input type="checkbox"/> No</span>
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor:  Reference:	7. Emissions Method Code:
8.a. Baseline Actual Emissions (if required): <span style="float:right">tons/year</span>	8.b. Baseline 24-month Period: From: <span style="float:right">To:</span>
9.a. Projected Actual Emissions (if required): <span style="float:right">tons/year</span>	9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <span style="margin-left: 100px;"><input type="checkbox"/> 10 years</span>
10. Calculation of Emissions:	
11. Pollutant Potential, Fugitive, and Actual Emissions Comment:	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*



**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**  
(Optional for unregulated emissions units.)

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: NOX - Nitrogen Oxides		2. Total Percent Efficiency of Control: 62	
3. Potential Emissions: 1205.8 lb/hour 5281 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: .62 LB/MMBTU Reference: PERMIT		7. Emissions Method Code: (0) EQUAL TO EQUIVALENT ALLOWABLE EMISSION/WORST-CASE ALLOWABLE EMISSION.	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: 0.62 lb/mmbtu * 1944.8 mmbtu/hr = 1205.8 lb/hr; 1205.8 lb/hr * 8760 hr/yr/2000 lb/ton = 5281 ton/yr			
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Facility-wide NOx cap of 6,666 tpy. Emission factor based on Acid Rain permit annual rate average. Potential emission rate with SNCR range between 0.59 to 0.24 lb/mbtu.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: (OTHER) assumed by applicant for other reasons (Explain in comment field)	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: .62 POUNDS PER MILLION BTU HEAT INPUT	4. Equivalent Allowable Emissions: 1205.78 lb/hour          5281 tons/year
5. Method of Compliance: Annual average of CEM hourly data. (40 CFR Part 75)	
6. Allowable Emissions Comment (Description of Operating Method): Phase II NOx. There are no requirements to operate the proposed SNCR system. Source will operate the SNCR as needed to meet CAIR and CAMR	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS  
 (Optional for unregulated emissions-units.)**

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: PB - Lead - Total (elemental lead and lead compounds)		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:			
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Limited to 100 ppm as specification of used oil.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

**(Optional for unregulated emissions units.)**

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: PM - Particulate Matter - Total		2. Total Percent Efficiency of Control: 98	
3. Potential Emissions: 194.5 lb/hour 1065 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: .125 LB/MMBTU Reference: PERMIT		7. Emissions Method Code: (0) EQUAL TO EQUIVALENT ALLOWABLE EMISSION/WORST-CASE ALLOWABLE EMISSION.	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: lb/hr = 1944.8 mmBtu/hr*0.1 lb/mmBtu = 194.5lb/hr. TPY = 1944.8 mmBtu/hr*0.125 lb/mmBtu * 8760 hrs/yr/*1 ton/2000 lb = 1065 TPY			
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Emission factor based on 0.1 lb/MMBtu, 21 hours (steady- state); 0.3 lb/MMBtu, 3 hours (soot-blowing).			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

**Allowable Emissions** Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: (RULE) required by rule specified in regulation	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: .1 POUNDS PER MILLION BTU HEAT INPUT	4. Equivalent Allowable Emissions: 194.48 lb/hour          1065 tons/year
5. Method of Compliance: Test not required if operation < 400 hours/FFY.	
6. Allowable Emissions Comment (Description of Operating Method): During normal operations while firing coal.	

**Allowable Emissions** Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: (RULE) required by rule specified in regulation	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: .3 POUNDS PER MILLION BTU HEAT INPUT	4. Equivalent Allowable Emissions: 583.44 lb/hour          1065 tons/year
5. Method of Compliance: Test not required if operation < 400 hours/FFY.	
6. Allowable Emissions Comment (Description of Operating Method): During the 3 hrs in any 24 hrs period allowed for boiler cleaning(soot blowing) and load changing.	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**  
(Optional for unregulated emissions units.)

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM10 - Particulate Matter - PM10		2. Total Percent Efficiency of Control: 98	
3. Potential Emissions: 194.5 lb/hour 1065 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor:  Reference:		7. Emissions Method Code: (0) EQUAL TO EQUIVALENT ALLOWABLE EMISSION/WORST-CASE ALLOWABLE EMISSION.	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:			
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Assumed to be the same as PM.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*



**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

**(Optional for unregulated emissions units.)**

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: SO2 - Sulfur Dioxide		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 4084.08 lb/hour 17888 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 2.1 LB/MMBTU Reference: PERMIT		7. Emissions Method Code: (0) EQUAL TO EQUIVALENT ALLOWABLE EMISSION/WORST-CASE ALLOWABLE EMISSION.	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: 2.1 lb/mmbtu * 1944.8 mmbtu/hr = 4084.08 lb/hr; 4094.08 lb/hr * 8760 hr/yr * 1/2000 lb/ton = 17888 ton/yr			
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Potential based on Unit 1 standard of 2.1 lb/mmbtu rate. Unit 1 can emit at 4.5 lb/mmbtu if both coal units on line.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: (OTHER) assumed by applicant for other reasons (Explain in comment field)	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 2.1 POUNDS PER MILLION BTU HEAT INPUT	4. Equivalent Allowable Emissions: 4084.08 lb/hour      17888 tons/year
5. Method of Compliance: Daily 24 hour average based on CEM or FS&A Program. See SC12.	
6. Allowable Emissions Comment (Description of Operating Method): Applicant request. 4.5 lbs/mmBtu for unit 1 and 2 combined.	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**  
(Optional for unregulated emissions units.)

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: VOC - Volatile Organic Compounds	2. Total Percent Efficiency of Control:
3. Potential Emissions: 5.7 lb/hour 24.8 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: .07 LB/TON BURNED Reference: SCC	7. Emissions Method Code: (3) CALCULATED USING EMISSION FACTOR FROM AP-42/FIRE SYSTEM.
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years
10. Calculation of Emissions: $0.07 \text{ lb/ton} * 81.03 \text{ ton/yr} = 5.7 \text{ lb/hr}; 5.7 \text{ lb/hr} * 8760 \text{ hours/yr} * 1/2000 \text{ lb/ton} = 24.8 \text{ tons/yr}$	
11. Pollutant Potential, Fugitive, and Actual Emissions Comment:	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*

### G. VISIBLE EMISSIONS INFORMATION

**Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.**

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: VE40 - VISIBLE EMISSIONS - 40% NORMAL OPACITY	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 40%                      Exceptional Conditions:                      % Maximum Period of Excess Opacity Allowed:                      min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment: The Permittee elected to utilize a transmissometer (opacity meter) for demonstrating compliance with the visible emissions limit.	

**Visible Emissions Limitation:** Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: VE60 - VISIBLE EMISSIONS - 60% NORMAL OPACITY	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: %                      Exceptional Conditions:                      % Maximum Period of Excess Opacity Allowed:                      min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment: During the 3-hrs in any 24 hr period allowed for boiler cleaning (soot blowing) and load change. Test not required if operation < 400 hours/FFY.	

### H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

**Continuous Monitoring System:** Continuous Monitor 1 of 6

1. Parameter Code: FLOW - Volumetric flow rate	2. Pollutant(s):
3. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information... Manufacturer: SICK Model Number: FLOWSIC107 Serial Number: 00478749	
5. Installation Date: 02-OCT-01	6. Performance Specification Test Date: 10-JUN-03
7. Continuous Monitor Comment: Smith Flow monitor is a combination of the Sierra and Sick Systems.	
Status: Active	

**Continuous Monitoring System:** Continuous Monitor 2 of 6

1. Parameter Code: CO2 - Carbon dioxide	2. Pollutant(s):
3. CMS Requirement: <input type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information... Manufacturer: SIEMENS Model Number: ULTRAMAT 6E Serial Number: N5-680	
5. Installation Date: 02-OCT-01	6. Performance Specification Test Date: 10-JUN-03
7. Continuous Monitor Comment: Spectrum Systems Model 300 Dilution Monitoring System uses the Siemens CO2 analyzer to measure the diluent component of the SO2 and NOX emission rate. Unit is required to monitor CO2 under 2-296.405(	
Status: Active	

**Continuous Monitoring System:** Continuous Monitor 3 of 6

1. Parameter Code: EM - EMISSION	2. Pollutant(s): SO2
3. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information... Manufacturer: THERMO ENVIRONMENTAL Model Number: 43C Serial Number: 43C-70674-366	
5. Installation Date: 02-OCT-02	6. Performance Specification Test Date: 10-JUN-03
7. Continuous Monitor Comment: Unit has elected to install and operate CEM for SO2 in lieu of monitoring emissions using fuel sampling and analysis under rule 62-296.405(1)(f)1. Additional requirements under 40CFR75.	
Status: Active	

**Continuous Monitoring System:** Continuous Monitor 4 of 6

1. Parameter Code: VE - Visible emissions (opacity)	2. Pollutant(s):
3. CMS Requirement: <input type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information... Manufacturer: SPECTRUM SYSTEMS Model Number: SPEC42 Serial Number: 1418010,1418008	
5. Installation Date: 30-JAN-02	6. Performance Specification Test Date: 09-MAR-04
7. Continuous Monitor Comment:	
Status: Active	

**Continuous Monitoring System:** Continuous Monitor 5 of 6

1. Parameter Code: EM - EMISSION	2. Pollutant(s): NOX
3. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information... Manufacturer: THERMO ENVIRONMENTAL Model Number: 42C Serial Number: 42C-70205-365	
5. Installation Date: 02-OCT-01	6. Performance Specification Test Date: 10-JUN-03
7. Continuous Monitor Comment: Spectrum Systems Model 300 Dilution Monitoring System uses Siemens and Teco analyzers to calculate unit NOx emission rate. CEM required under Title IV 40 CFR Part 75.	
Status: Active	

**Continuous Monitoring System:** Continuous Monitor 6 of 6

1. Parameter Code: FLOW - Volumetric flow rate	2. Pollutant(s):
3. CMS Requirement: <input type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information... Manufacturer: SIERRA Model Number: 650 Serial Number: SM-1B	
5. Installation Date: 01-DEC-93	6. Performance Specification Test Date: 10-JUN-03
7. Continuous Monitor Comment: Spectrum Systems Model 300 Dilution Monitoring System uses heat input measurements from flow to calculate hourly emissions. CEM flow monitors are required under Title IV 40 CFR Part 75.	
Status: Active	



**I. EMISSIONS UNIT ADDITIONAL INFORMATION**

**Additional Requirements for All Applications, Except as Otherwise Stated**

<p>1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Applicable      <input type="checkbox"/> Previously Submitted, Date:      <input type="checkbox"/> Attachment</p>
<p>2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Applicable      <input type="checkbox"/> Previously Submitted, Date:      <input type="checkbox"/> Attachment</p>
<p>3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Applicable      <input type="checkbox"/> Previously Submitted, Date:      <input type="checkbox"/> Attachment</p>
<p>4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input checked="" type="checkbox"/> Applicable      <input type="checkbox"/> Previously Submitted, Date:      <input checked="" type="checkbox"/> Attachment</p>
<p>5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Applicable      <input type="checkbox"/> Previously Submitted, Date:      <input type="checkbox"/> Attachment</p>
<p>6. Compliance Demonstration Reports/Records</p> <p><input type="checkbox"/> Applicable      <input type="checkbox"/> Previously Submitted, Date:      <input type="checkbox"/> Attachment</p> <p style="padding-left: 100px;"><input type="checkbox"/> To Be Submitted, Date (if known):</p> <p>Previously Submitted Test Date(s)/Pollutants Tested:</p> <p>To be Submitted Test Date(s)/Pollutants Tested:</p> <p>Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.</p>
<p>7. Other Information Required by Rule or Statute</p> <p><input type="checkbox"/> Applicable      <input type="checkbox"/> Attachment</p>

**Additional Requirements for Title V Air Operation Permit Applications**

1. Identification of Applicable Requirements	<input checked="" type="checkbox"/> Applicable	<input checked="" type="checkbox"/> Attachment
2. Compliance Assurance Monitoring Plan	<input type="checkbox"/> Applicable	<input type="checkbox"/> Attachment
3. Alternative Methods of Operation	<input checked="" type="checkbox"/> Applicable	<input checked="" type="checkbox"/> Attachment
4. Alternative Modes of Operation (Emissions Trading)	<input type="checkbox"/> Applicable	<input type="checkbox"/> Attachment
5. Acid Rain Part Application		
Certificate of Representation (EPA Form No. 7610-1)	<input type="checkbox"/> Applicable <input type="checkbox"/> Previously Submitted, Date:	<input type="checkbox"/> Attachment
Acid Rain Part (Form No. 62-210.900(1)(a))	<input type="checkbox"/> Applicable <input type="checkbox"/> Previously Submitted, Date:	<input type="checkbox"/> Attachment
Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)	<input type="checkbox"/> Applicable <input type="checkbox"/> Previously Submitted, Date:	<input type="checkbox"/> Attachment
New Unit Exemption (Form No. 62-210.900(1)(a)2.)	<input type="checkbox"/> Applicable <input type="checkbox"/> Previously Submitted, Date:	<input type="checkbox"/> Attachment
Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)	<input type="checkbox"/> Applicable <input type="checkbox"/> Previously Submitted, Date:	<input type="checkbox"/> Attachment
Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)	<input type="checkbox"/> Applicable <input type="checkbox"/> Previously Submitted, Date:	<input type="checkbox"/> Attachment
Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)	<input type="checkbox"/> Applicable <input type="checkbox"/> Previously Submitted, Date:	<input type="checkbox"/> Attachment

**Additional Requirements for Air Construction Permit Applications**

- |   |                                     |                                     |
|---|-------------------------------------|-------------------------------------|
| 1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))   | <input type="checkbox"/> Applicable | <input type="checkbox"/> Attachment |
| 2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(4)(d), F.A.C., and Rule 62-212.500(4)(f), F.A.C.) | <input type="checkbox"/> Applicable | <input type="checkbox"/> Attachment |
| 3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only)                | <input type="checkbox"/> Applicable | <input type="checkbox"/> Attachment |

**Other Information Regarding this Emissions Unit**

- |                                     |  |  |
|-------------------------------------|--|--|
| 1. Other Emissions Unit Information | <input checked="" type="checkbox"/> Applicable | <input checked="" type="checkbox"/> Attachment |
|-------------------------------------|--|--|
- Note: Provide any other information related to the emissions unit addressed in this Emissions Unit Information Section that is not elsewhere provided in the application, not otherwise required and that you, the applicant, believe may be helpful.

**Additional Requirements Comment**

**Emission Unit Attachments**

Supplemental Item	Electronic File Name	Attachment Description	Electronic Document	Date Uploaded
Procedures for Startup and Shutdown	SMITH SNCR Startup _ Shutdown Procedures.doc	Smith SNCR Startup and Shutdown Procedures.	Yes	01/07/2008
Other Emissions Unit Information	Smith SNCR Schedule.pdf	Smith SNCR Schedule.	Yes	01/04/2008
Identification of Applicable Requirements	DOCS-#262697-v1-Smith_-_Unit_001_-_EPA.DOC	Federal applicable rule list for Unit 1.	Yes	01/09/2008
	DOCS-#262696-v2-Smith_-_Unit_001_-_FDEP.DOC	State applicable rule list for Unit 1.	Yes	01/10/2008
Alternative Methods of Operation	Smith 2 Methods.doc	Alternative Methods of Operation List.	Yes	01/04/2008

**III. EMISSIONS UNIT INFORMATION**  
**A. GENERAL EMISSIONS UNIT INFORMATION**

**Title V Air Operation Permit Emissions Unit Classification**

1. (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

**Emissions Unit Description and Status**

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:  
 BOILER NUMBER 2 - 2,246.2 MMBTU/HOUR (PHASE II ACID RAIN)

3. Emissions Unit Identification Number: 2

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 08-APR-67	7. Emissions Unit Major Group SIC Code: 49	8. Acid Rain Unit? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
-------------------------------------	--------------------------------	---------------------------------------	---	--

9. Package Unit Manufacturer: \_\_\_\_\_ Model Number: \_\_\_\_\_

10. Generator Nameplate Rating: 205 MW

11. Emissions Unit Comment:  
 Units -001 and -002 share a common stack

**Emissions Unit Control Equipment**

Code	Equipment	Description
24	MODIFIED FURNACE/BURNER DESIGN	Low NOx burners manufactured by Foster Wheeler.
10	ELECTROSTATIC PRECIPITATOR HIGH EFFICIENCY (95.0-99.9%)	Hot Precipitator Buell Model #BAL 2X34N333-4-3P and Cold Precipitator General Electric Model #BE2.1X(2-12`S) (12)-30-111-4.3P
205	LOW NOX BURNERS	Low NOx Burners capable of 25% reduction.
107	SELECTIVE NONCATALYTIC REDUCTION FOR NOX	SNCR HERT Technology projected for startup in January, 2009.

**B. EMISSIONS UNIT CAPACITY INFORMATION**  
 (Optional for unregulated emissions units.)

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Process or Throughput Rate:		
2. Maximum Production Rate:		
3. Maximum Heat Input Rate:	2246.2 million Btu/hr	
4. Maximum Incineration Rate:	pounds/hr	
	tons/day	
5. Requested Maximum Operating Schedule:	24 hours/day	7 days/week
	52 weeks/year	8760 hours/year
6. Operating Capacity/Schedule Comment:	Coal. 76 mmBtu/hr for #2 fuel oil and "on-spec" used oil. Compliance by fuel records.	

**C. EMISSION POINT (STACK/VENT) INFORMATION**  
 (Optional for unregulated emissions units.)

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram:	2. Emission Point Type Code: 2 - An emission point serving 2 or more EU's capable of simultaneous operation	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: • 1 - BOILER NUMBER 1 - 1,944.8 MMBTU/HOUR (PHASE II ACID RAIN)		
5. Discharge Type Code: (V) A STACK WITH AN UNOBSTRUCTED OPENING DISCHARGING IN A VERTICAL/NEARLY VERTICAL DIRECTION	6. Stack Height: 199 feet	7. Exit Diameter: 18 feet
8. Exit Temperature: 334° F	9. Actual Volumetric Flow Rate: 1568308 acfm	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: 16      East (km): 625.053 North (km): 3349.243	14. Emission Point Latitude/Longitude... Latitude: 30° 16' 6.2" N Longitude: 85° 41' 59.8" W	
15. Emission Point Comment: Units -001 and -002 share a common stack. Flow rate above for both units.		



**D. SEGMENT (PROCESS/FUEL) INFORMATION**

**Segment Description and Rate: Segment 1 of 3**

1. Segment Description (Process/Fuel Type): Boiler fired with Pulverized Bituminous Coal. Emissions related to tons burned.		
2. Source Classification Code (SCC): 10100212	3. SCC Units: Tons Bituminous Coal Burned	
4. Maximum Hourly Rate: 93.59	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 3	8. Maximum % Ash: 14	9. Million Btu per SCC Unit: 24
10. Segment Comment: Minimum MBTU per SCC unit is 23. Average MBTU is 24.		
Is this a valid segment? Yes		

**Segment Description and Rate: Segment 2 of 3**

1. Segment Description (Process/Fuel Type): Boiler fired with #2 fuel oil and "on spec." used oil. emissions related to thousand gallons burned.		
2. Source Classification Code (SCC): 10100501	3. SCC Units: 1000 Gallons Distillate Oil (No. 1 & 2) Burned	
4. Maximum Hourly Rate: .55	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: .5	8. Maximum % Ash:	9. Million Btu per SCC Unit: 138
10. Segment Comment: Maximum percent ash in item 8 is 0.05 %.		
Is this a valid segment? Yes		

**Segment Description and Rate:** Segment 3 of 3

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC): 10101302	3. SCC Units: 1000 Gallons Waste Oil Burned	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 132
10. Segment Comment: Used oil specification: Arsenic 5 PPM, Cadmium 2 PPM, Chromium 10 PPM, Lead 100 PPM, Total Halogens 1000 PPM, PCB 50 ppm.		
Is this a valid segment? Yes		

**E. EMISSIONS UNIT POLLUTANTS****List of Pollutants Emitted by Emissions Unit**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code	Valid?
CO			NS	Yes
H015			EL	Yes
H027			EL	Yes
H046			EL	Yes
H106				Yes
H107				Yes
H150			EL	Yes
HAPS				Yes
NOX	NSCR (NON-SELECTIVE CATALYTIC REDUCTION)	LOW NOX BURNERS	EL	Yes
PB			EL	Yes
PM	ELECTROSTATIC PRECIPITATOR HIGH EFFICIENCY (95.0-99.9%)		EL	Yes
PM10	ELECTROSTATIC PRECIPITATOR HIGH EFFICIENCY (95.0-99.9%)		NS	Yes
SO2			EL	Yes
VOC				Yes



**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*



**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*





**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*



**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*



**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*



**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**  
(Optional for unregulated emissions units.)

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: H150 - Polychlorinated biphenyls (Aroclors)		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor:  Reference:		7. Emissions Method Code:	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From:                      To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:			
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Limited to 50 ppm as specification of used oil			



**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: HAPS - Total Hazardous Air Pollutants	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour    tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor:  Reference:	7. Emissions Method Code:
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From:                      To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years
10. Calculation of Emissions:	
11. Pollutant Potential, Fugitive, and Actual Emissions Comment:	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**  
(Optional for unregulated emissions units.)

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: NOX - Nitrogen Oxides		2. Total Percent Efficiency of Control: 60	
3. Potential Emissions: 988.33 lb/hour 4329 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: .44 LB/MMBTU Reference: PERMIT		7. Emissions Method Code: (0) EQUAL TO EQUIVALENT ALLOWABLE EMISSION/WORST-CASE ALLOWABLE EMISSION.	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: 0.44 lb/mmbtu * 2246.2 mmbtu/hr = 988.33 lb/hr; 988.3 lb/hr * 8760 hr/yr/2000 lb/ton = 4328.9 ton/yr			
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Facility-wide NOx cap of 6,666 tpy; Emission factor based on Acid Rain permit average annual rate. Potential emission rate with SNCR range from 0.41 to 0.25 lb/mmbtu.			

## F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: (OTHER) assumed by applicant for other reasons (Explain in comment field)	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: .44 POUNDS PER MILLION BTU HEAT INPUT	4. Equivalent Allowable Emissions: 988.33 lb/hour                      4329 tons/year
5. Method of Compliance: Annual Average of CEM hourly data.	
6. Allowable Emissions Comment (Description of Operating Method): Phase II NOx. There are no requirements to operate the proposed SNCR system. Source will operate the SNCR as needed to meet CAIR and CAMR.	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**  
(Optional for unregulated emissions units.)

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: PB - Lead - Total (elemental lead and lead compounds)	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour <span style="float: right;">tons/year</span>	4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor:  Reference:	7. Emissions Method Code:
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years
10. Calculation of Emissions:	
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Limited to 100 ppm as specification of used oil.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

**(Optional for unregulated emissions units.)**

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: PM - Particulate Matter - Total		2. Total Percent Efficiency of Control: 98	
3. Potential Emissions: 224.6 lb/hour 1229.8 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: .125 LB/MMBTU Reference: PERMIT		7. Emissions Method Code: (0) EQUAL TO EQUIVALENT ALLOWABLE EMISSION/WORST-CASE ALLOWABLE EMISSION.	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: lb/hr = 2246.2 mmBtu/hr*0.1 lb/mmBtu = 224.6lb/hr. TPY = 2246.2 mmBtu/hr*0.125 lb/mmBtu * 8760 hrs/yr/*1 ton/2000 lb = 1229.8 TPY			
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Emission factor based on 0.1 lb/MMBtu, 21 hours (steady- state); 0.3 lb/MMBtu, 3 hours (soot-blowing).			



**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

**Allowable Emissions** Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: (RULE) required by rule specified in regulation	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: .3 POUNDS PER MILLION BTU HEAT INPUT	4. Equivalent Allowable Emissions: 673.86 lb/hour      1229.8 tons/year
5. Method of Compliance: Test not required if operation < 400 hours/FFY.	
6. Allowable Emissions Comment (Description of Operating Method): During the 3 hrs in any 24 hrs period allowed for boiler cleaning(soot blowing) and load changing.	

**Allowable Emissions** Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: (RULE) required by rule specified in regulation	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: .1 POUNDS PER MILLION BTU HEAT INPUT	4. Equivalent Allowable Emissions: 224.62 lb/hour      1229.8 tons/year
5. Method of Compliance: Test not required if operation < 400 hours/FFY.	
6. Allowable Emissions Comment (Description of Operating Method): During normal operations while firing coal.	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**  
(Optional for unregulated emissions units.)

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM10 - Particulate Matter - PM10		2. Total Percent Efficiency of Control: 98	
3. Potential Emissions: 224.6 lb/hour                      1229.8 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor:  Reference:		7. Emissions Method Code: (0) EQUAL TO EQUIVALENT ALLOWABLE EMISSION/WORST-CASE ALLOWABLE EMISSION.	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From:                      To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:			
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Assumed to be the same as PM.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**  
(Optional for unregulated emissions units.)

**Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: SO2 - Sulfur Dioxide		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 6064.74 lb/hour 26564 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 2.7 LB/MMBTU Reference: PERMIT		7. Emissions Method Code: (0) EQUAL TO EQUIVALENT ALLOWABLE EMISSION/WORST-CASE ALLOWABLE EMISSION.	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: 2.7 lb/mmbtu * 2246.2 mmbtu/hr = 6064.74 lb/hr; 6064.74 lb/hr * 8760 hr/yr * 1/2000 lb/ton = 26564 ton/yr			
11. Pollutant Potential, Fugitive, and Actual Emissions Comment: Potential based on Unit 2 limit of 2.7 lb/mmbtu; Unit 2 allowed to emit at max 4.5 lb/mmbtu when both coal units on line.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: (OTHER) assumed by applicant for other reasons (Explain in comment field)	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 2.7 POUNDS PER MILLION BTU HEAT INPUT	4. Equivalent Allowable Emissions: 6064.74 lb/hour          26564 tons/year
5. Method of Compliance: Daily 24 hour average based on CEM or FS&A. See SC 12.	
6. Allowable Emissions Comment (Description of Operating Method): Applicant request. 4.5 lbs/mmBtu for unit 1 and 2 combined.	



**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

*No Pollutant Allowable Emissions information submitted.*

**G. VISIBLE EMISSIONS INFORMATION**

**Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.**

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: VE40 - VISIBLE EMISSIONS - 40% NORMAL OPACITY	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 40%                      Exceptional Conditions:                      % Maximum Period of Excess Opacity Allowed:                      min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment: The Permittee elected to utilize a transmissometer (opacity meter) for demonstrating compliance with the visible emissions limit.	

**Visible Emissions Limitation:** Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: VE60 - VISIBLE EMISSIONS - 60% NORMAL OPACITY	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: %                      Exceptional Conditions:                      % Maximum Period of Excess Opacity Allowed:                      min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment: During the 3-hrs in any 24 hr period allowed for boiler cleaning (soot blowing) and load change. Test not required if operation < 400 hours/FFY.	



**H. CONTINUOUS MONITOR INFORMATION****Complete if this emissions unit is or would be subject to continuous monitoring.****Continuous Monitoring System:** Continuous Monitor 1 of 5

1. Parameter Code: CO2 - Carbon dioxide	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: SIEMENS Model Number: ULTRAMAT 6E Serial Number: ND-886	
5. Installation Date: 01-JUL-02	6. Performance Specification Test Date: 10-JUN-03
7. Continuous Monitor Comment: Spectrum Systems Model 300 Dilution Monitoring System uses the Siemens CO2 analyzer to measure the diluent component of the SO2 and NOX emission rate. Unit is required to monitor CO2 under 2-296.405(	
Status: Active	

**Continuous Monitoring System:** Continuous Monitor 2 of 5

1. Parameter Code: EM - EMISSION	2. Pollutant(s): SO2
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: THERMO ENVIRONMENTAL Model Number: 43C Serial Number: 43C-72789-372	
5. Installation Date: 01-JUL-02	6. Performance Specification Test Date: 10-JUN-03
7. Continuous Monitor Comment: Unit has elected to install and operate CEM for SO2 in lieu of monitoring emissions using fuel sampling and analysis under rule 62-296.405(1)(f)1. Specific conditions from existing permit is enclosed.	
Status: Active	

**Continuous Monitoring System:** Continuous Monitor 3 of 5

1. Parameter Code: VE - Visible emissions (opacity)	2. Pollutant(s):
3. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information... Manufacturer: SPECTRUM Model Number: SPEC41 Serial Number: 1448000,1418002	
5. Installation Date: 28-SEP-02	6. Performance Specification Test Date: 09-MAR-04
7. Continuous Monitor Comment:	
Status: Active	

**Continuous Monitoring System:** Continuous Monitor 4 of 5

1. Parameter Code: FLOW - Volumetric flow rate	2. Pollutant(s):
3. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information... Manufacturer: SICK Model Number: FLOWSIC107 Serial Number: 478751, 47875	
5. Installation Date: 01-JAN-01	6. Performance Specification Test Date: 10-JUN-03
7. Continuous Monitor Comment: Spectrum Systems Model 300 Dilution Monitoring System uses heat input measurements from flow to calculate hourly emissions. CEM flow monitors are required under Title IV 40 CFR Part 75.	
Status: Active	



**I. EMISSIONS UNIT ADDITIONAL INFORMATION****Additional Requirements for All Applications, Except as Otherwise Stated**

<p>1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Applicable      <input type="checkbox"/> Previously Submitted, Date:      <input type="checkbox"/> Attachment</p>
<p>2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Applicable      <input type="checkbox"/> Previously Submitted, Date:      <input type="checkbox"/> Attachment</p>
<p>3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Applicable      <input type="checkbox"/> Previously Submitted, Date:      <input type="checkbox"/> Attachment</p>
<p>4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input checked="" type="checkbox"/> Applicable      <input type="checkbox"/> Previously Submitted, Date:      <input checked="" type="checkbox"/> Attachment</p>
<p>5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Applicable      <input type="checkbox"/> Previously Submitted, Date:      <input type="checkbox"/> Attachment</p>
<p>6. Compliance Demonstration Reports/Records</p> <p><input type="checkbox"/> Applicable      <input type="checkbox"/> Previously Submitted, Date:      <input type="checkbox"/> Attachment</p> <p><input type="checkbox"/> To Be Submitted, Date (if known):</p> <p>Previously Submitted Test Date(s)/Pollutants Tested:</p> <p>To be Submitted Test Date(s)/Pollutants Tested:</p> <p>Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.</p>
<p>7. Other Information Required by Rule or Statute</p> <p><input type="checkbox"/> Applicable      <input type="checkbox"/> Attachment</p>

**Additional Requirements for Title V Air Operation Permit Applications**

1. Identification of Applicable Requirements <input checked="" type="checkbox"/> Applicable <span style="float: right;"><input checked="" type="checkbox"/> Attachment</span>
2. Compliance Assurance Monitoring Plan <input type="checkbox"/> Applicable <span style="float: right;"><input type="checkbox"/> Attachment</span>
3. Alternative Methods of Operation <input checked="" type="checkbox"/> Applicable

APPLICATION: SMITH SNCR CONSTRUCTION PERMIT (#1805-1)  
 FACILITY: GULF POWER COMPANY (#0050014)

<b>Facility Attachments</b>				
<b>Supplemental Item</b>	<b>Electronic File Name</b>	<b>Attachment Description</b>	<b>Electronic Document?</b>	<b>Date Uploaded</b>
RULE APPLICABILITY ANALYSIS	DOCS-#262692-v1-Smith_Facility_list_-EPA.DOC	Federal applicable rule list.	Yes	1/9/2008
->>	DOCS-#262695-v1-Smith_Facility_list_-FDEP.DOC	State applicable rule list.	Yes	1/9/2008
<b>Emissions Unit Attachments</b>				
<b>Emissions Unit: 001 - BOILER NUMBER 1 - 1,944.8 MMBTU/HOUR (PHASE II ACID RAIN)</b>				
<b>Supplemental Item</b>	<b>Electronic File Name</b>	<b>Attachment Description</b>	<b>Electronic Document?</b>	<b>Date Uploaded</b>
ALTERNATIVE METHODS OF OPERATION	Smith 2 Methods.doc	Alternative Methods of Operation List.	Yes	1/4/2008
DETAILED DESCRIPTION OF CONTROL EQUIPMENT	Smith SNCR-HERT Process Design.doc	Smith SNCR Detail Control Description.	Yes	1/7/2008
IDENTIFICATION OF APPLICABLE REQUIREMENTS	DOCS-#262696-v2-Smith_-_Unit_001_-_FDEP.DOC	State applicable rule list for Unit 1.	Yes	1/10/2008
->>	DOCS-#262697-v1-Smith_-_Unit_001_-_EPA.DOC	Federal applicable rule list for Unit 1.	Yes	1/9/2008
OTHER EMISSIONS UNIT INFORMATION	Smith SNCR Schedule.pdf	Smith SNCR Schedule.	Yes	1/4/2008
PROCEDURES FOR STARTUP AND SHUTDOWN	SMITH SNCR Startup _Shutdown Procedures.doc	Smith SNCR Startup and Shutdown Procedures.	Yes	1/7/2008
<b>Emissions Unit: 002 - BOILER NUMBER 2 - 2,246.2 MMBTU/HOUR (PHASE II ACID RAIN)</b>				
<b>Supplemental Item</b>	<b>Electronic File Name</b>	<b>Attachment Description</b>	<b>Electronic Document?</b>	<b>Date Uploaded</b>
ALTERNATIVE METHODS OF OPERATION	Smith 1 Methods.doc	Alternative Methods of Operation.	Yes	1/4/2008
DETAILED DESCRIPTION OF CONTROL EQUIPMENT	Smith SNCR-HERT Process Design.doc	Smith SNCR Design Information.	Yes	1/7/2008
IDENTIFICATION OF APPLICABLE REQUIREMENTS	DOCS-#262698-v1-Smith_-_Unit_002_-_FDEP.DOC	State applicable rule list for Unit 2.	Yes	1/10/2008
->>	DOCS-#262699-v1-Smith_-_Unit_002_-_EPA.DOC	Federal applicable rule list for Unit 2.	Yes	1/9/2008
OTHER EMISSIONS UNIT INFORMATION	Smith SNCR Schedule.pdf	Smith SNCR Schedule.	Yes	1/4/2008
PROCEDURES FOR STARTUP AND SHUTDOWN	SMITH SNCR Startup _Shutdown Procedures.doc	Smith SNCR Startup and Shutdown Procedures.	Yes	1/7/2008
Report Completed as of: 1/17/2008 12:59:50 PM				

Attachments  
AVAILABLE  
VIA EPSAR.

Elizabeth