

Jonathan Holton

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

GULF POWER COMPANY
(SMITH PLANT),

Petitioner,

vs.

OGC CASE NO. 97-1822

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

_____ /

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, GULF POWER COMPANY, to grant an extension of time to file a petition for an administrative hearing on Permit No. 0050014-001-AV. See Exhibit 1.

Although Counsel for Petitioner has not discussed this request with counsel for the Respondent State of Florida Department of Environmental Protection, the Department has no objection to it. Therefore,

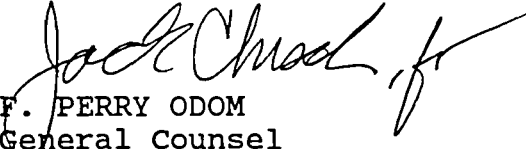
IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until February 1, 1999, to file a petition in this matter. Filing shall be complete on receipt by the Office of General

Counsel, Mail Station 35, Department of Environmental Protection,
3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 3d day of December, 1998, in
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314


CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed to:

Angela R. Morrison
123 South Calhoun Street
Tallahassee, Florida 32314

on this 4 day of December, 1998.

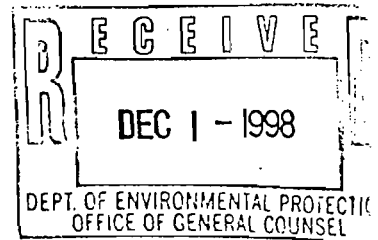
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



JEFFREY BROWN
Assistant General Counsel
Florida Bar No. 0843430

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION



In the Matter of an
Application for Permit by:

OGC No. 97-1822

Gulf Power Company
One Energy Place
Pensacola, FL 32520

DRAFT Permit No.: 0050014-001-AV
Smith Plant
Bay County

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 62-110.106(4), an extension of time, to and including February 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, Gulf states the following:

1. On or about October 13, 1997, Gulf received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0050014-001-AV) for the Smith Plant located in Bay County, Florida. Along with the Intent to Issue, Gulf received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."

2. By order dated October 12, 1998, the Department granted an extension of time until December 1, 1998, within which to file a petition for an administrative hearing.

3. The draft permit and associated documents contain several provisions that warrant clarification or correction.

4. Representatives of Gulf have corresponded and intend to continue to correspond with staff of the Department's Bureau of Air Regulation in an effort to resolve all issues.

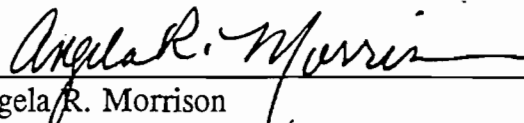
5. This request is filed simply as a protective measure to avoid waiver of Gulf's right to challenge certain conditions contained in the draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing.

6. Counsel for Gulf has attempted without success to contact Jonathan Holtom with the Department's Bureau of Air Regulation regarding this request.

WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0050014-001-AV be formally extended to and including February 1, 1999. If the Department denies this request, Gulf requests the opportunity to file a Petition for Administrative Proceedings within 10 days of such denial.

Respectfully submitted this 1st day of December, 1998.

HOPPING GREEN SAMS & SMITH, P.A.



Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(850) 222-7500
Attorney for GULF POWER COMPANY

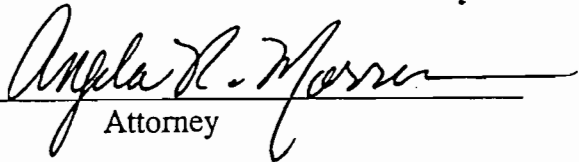
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by

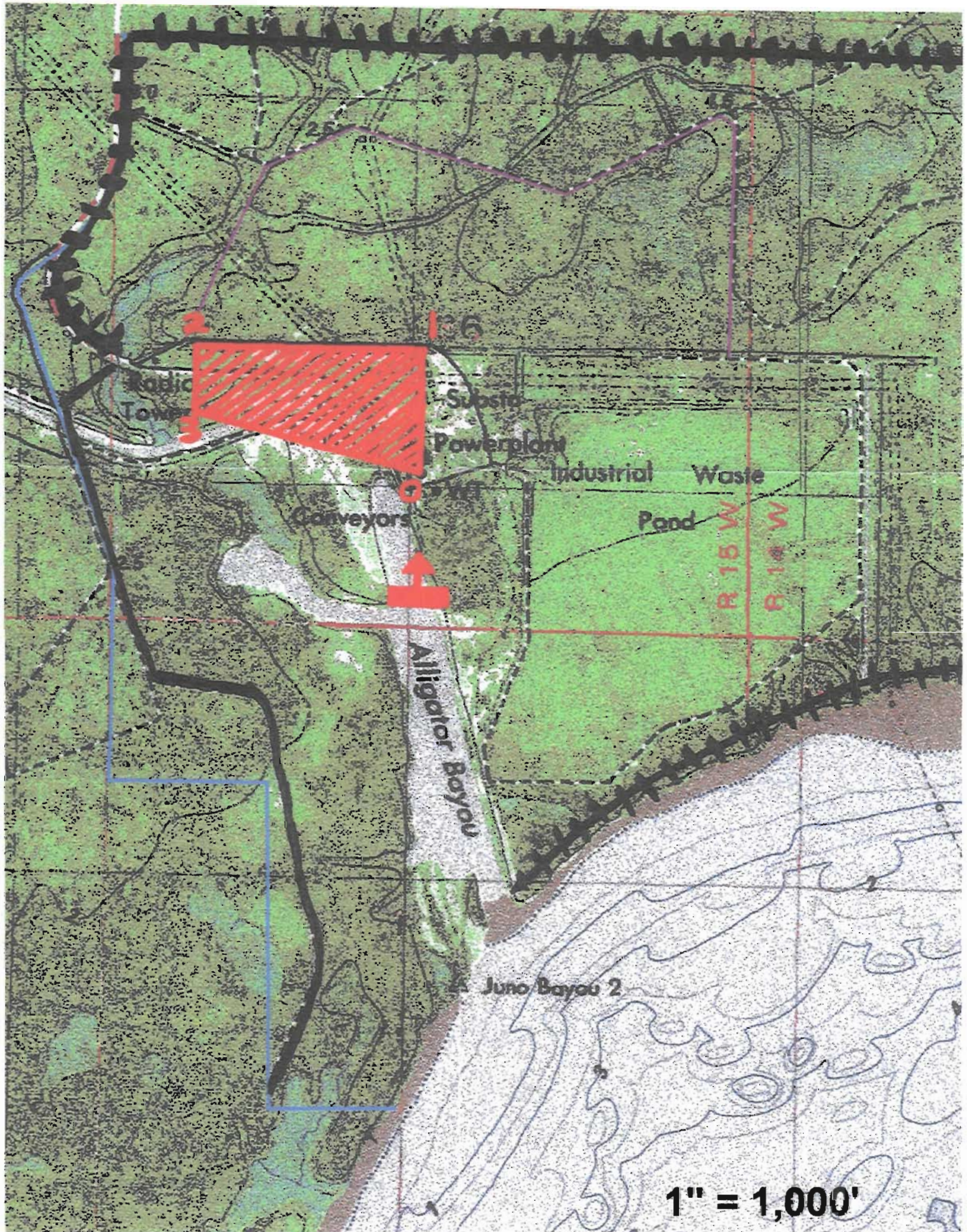
U.S. Mail on this 1st day of December, 1998:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600



Attorney



INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 28-Nov-2000 10:16am

From: Yi Zhu TAL
ZHU_Y

Dept: Air Resources Management

Tel No: 850/921-9558

To: Jonathan Holtom TAL

(HOLTOM_J)

Subject: Re: arms upload

These uploads are complete. Thank you. Yi

*Hi Yi,

*The following EARS applications are ready for your review and upload to ARMS:

* Gulf Power - Scholz - DEP

* Gulf Power - Smith - DEP

*

*Thanks for your help, Jonathan. (4/27/00)

*

Gulf Power Smith Readjusted Velocities 02/98

Gulf Power's Requested Heat Inputs and SO₂ emission rates

Emission Units	Maximum Heat Input MMBTU/hr	Controlled SO ₂ Em Rate (lb/MMBTU)	Requested Emission Rate (lb/hr)	Requested Emission Rate (g/s)
No.1	1944.8	6.17	11999.4	1512
No.2	2246.2	6.17	13859.1	1746
Total 1 & 2	4191.0	6.17	25858.5	3257
C T	542	0.5%S	273.8	34.5

Stack Parameters for Gulf Power Smith

Units 1 and 2 at 100% Load

Emission Units	Stack Height (m)	Stack Temp °K	Stack Vel (m/s)	Stack Diameter (m)
Unit 1&2 Coal Fired	60.66	441	31.3	5.49
Unit 3 Combustion Turbine	10.06	922	36.9	4.18

Location of Emission Units in Smith

Emission Units	x (m)	y (m)
No.1&2	0.0	0.0
No.3	-156.4	95.3

Results of Modeling-Emission Limiting Cases
(Building Downwash Included in all Cases)

Limiting Case 1-Units 1 and 2 at 100%

Proposed Fenceline Coordinates-based on Stack for Units 1,2

X (m)	Y (m)
0	-325
-250	-138
-270	-65
-320	-80
-350	20
-700	155
-700	380
-570	540
-570	620
-280	1097
1800	1097
1800	305
1675	305
1675	-475
1220	-533
230	-1039
0	-325

MODEL RESULTS SMITH All Units Operating
On-Property
(All Values in ug/m³)

	MET DATA	ANNUAL			H2h 24-HOUR			H2h-3 HOUR		
		AAQS=60			AAQS=260			AAQS=1330		
		CONC	RECEP		CONC	RECEP		CONC	RECEP	
1986	PENSACOLA	78	150m	250°	822	150m	250°	1967	150m	250°
1987	PENSACOLA	75	150m	250°	939	100m	250°	2188	100m	250°
1988	APALACHICOLA	52	350m	300°	835	200m	260°	1866	200m	260°
1989	APALACHICOLA	47	200m	260°	1019	150m	250°	1927	200m	260°
1990	APALACHICOLA	75	350m	300°	996	350m	300°	3143	350m	300°

Files: smith86m.grf, smith87m.grf, smith88m.grf, smith89m.grf, smith90m.grf

MODEL RESULTS SMITH All Units
Fenceline and Off-Property
(All Values in ug/m³)

	MET DATA	ANNUAL			H2h 24-HOUR			H2h-3 HOUR		
		AAQS=60			AAQS=260			AAQS=1330		
		CONC	RECEP		CONC	RECEP		CONC	RECEP	
1986	PENSACOLA	<10	-	-	186	300m	260°	665	350m	270°
1987	PENSACOLA	<10	-	-	216	250m	220°	689	350m	260°
1988	APALACHICOLA	<10	-	-	255	250m	230°	785	350m	270°
1989	APALACHICOLA	<10	-	-	236	300m	250°	727	300m	250°
1990	APALACHICOLA	<10	-	-	280	340m	270°	923	345m	270°

Files: smith86m.grf, smith87m.grf, smith88m.grf, smith89m.grf, smith90m.grf

1990 is the limiting year. The maximum value is located on the fenceline (340m, 270°) located to the west of the stack. The limit on Units 1 and 2 at 100% load is $6.17 / (280/260)$ or 5.73 lbs/MMBTU

Limiting Case 2--Unit 1 only at 100% Load

Emission Rates and Stack Parameters for Gulf Power Smith-Unit 1 Alone

Emission Units	Emission Rate (g/s)	Stack Height (m)	Stack Temp °K	Stack Vel (m/s)	Stack Diameter (m)
Unit 1 Coal Fired	1512	60.66	441	14.2	5.49
Unit 3 Combustion Turbine	34.5	10.06	922	36.9	4.18

MODEL RESULTS SMITH Unit 1 100% Load
 Maximum Fenceline and Off Property Values
 (All Values in ug/m³)

	MET DATA	H2h 24-HOUR			H2h-3 HOUR		
		AAQS=260			AAQS=1330		
		CONC	RECEP (X,Y)		CONC	RECEP (X,Y)	
1986	PENSACOLA	798	0	-325	3710	0	-325
1987	PENSACOLA	1060	0	-325	2966	-52	-295
1988	APALACHICOLA	928	-52	-295	3217	0	-325
1989	APALACHICOLA	1177	0	-325	3502	0	-325
1990	APALACHICOLA	945	0	-325	3622	-52	-295

Files: gp186vpd.grf, gp187vpd.grf, gp188vpd.grf, gp189vpd.grf, gp190vpd.grf

1989 is the limiting year. Maximum value is located on the proposed fenceline (0, -325) located to the south of the stack. The limit on Unit 1 at 100% load is $6.17/(1177/260)$ or 1.36 lbs/MMBTU when unit 1 is operating alone

Limiting Case 3--Unit 2 Only at 100% Load

Emission Rates and Stack Parameters for Gulf Power Smith-Unit 2 Alone

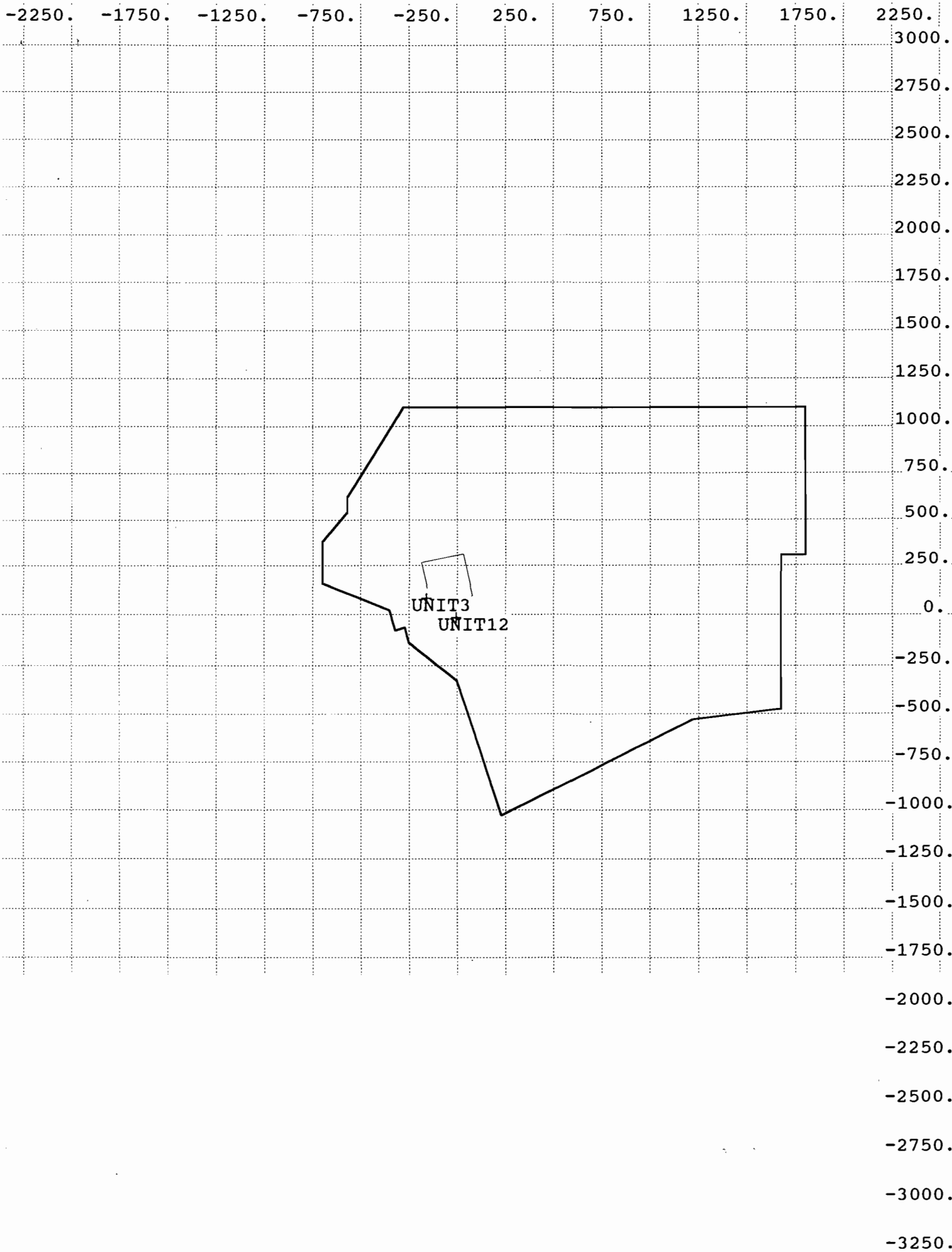
Emission Units	Emission Rate (g/s)	Stack Height (m)	Stack Temp °K	Stack Vel (m/s)	Stack Diameter (m)
Unit 2 Coal Fired	1746	60.66	441	17.1	5.49
Unit 3 Combustion Turbine	34.5	10.06	922	36.9	4.18

MODEL RESULTS SMITH Unit 2 100% Load
 Maximum Fenceline and Off Property Values
 (All Values in ug/m³)

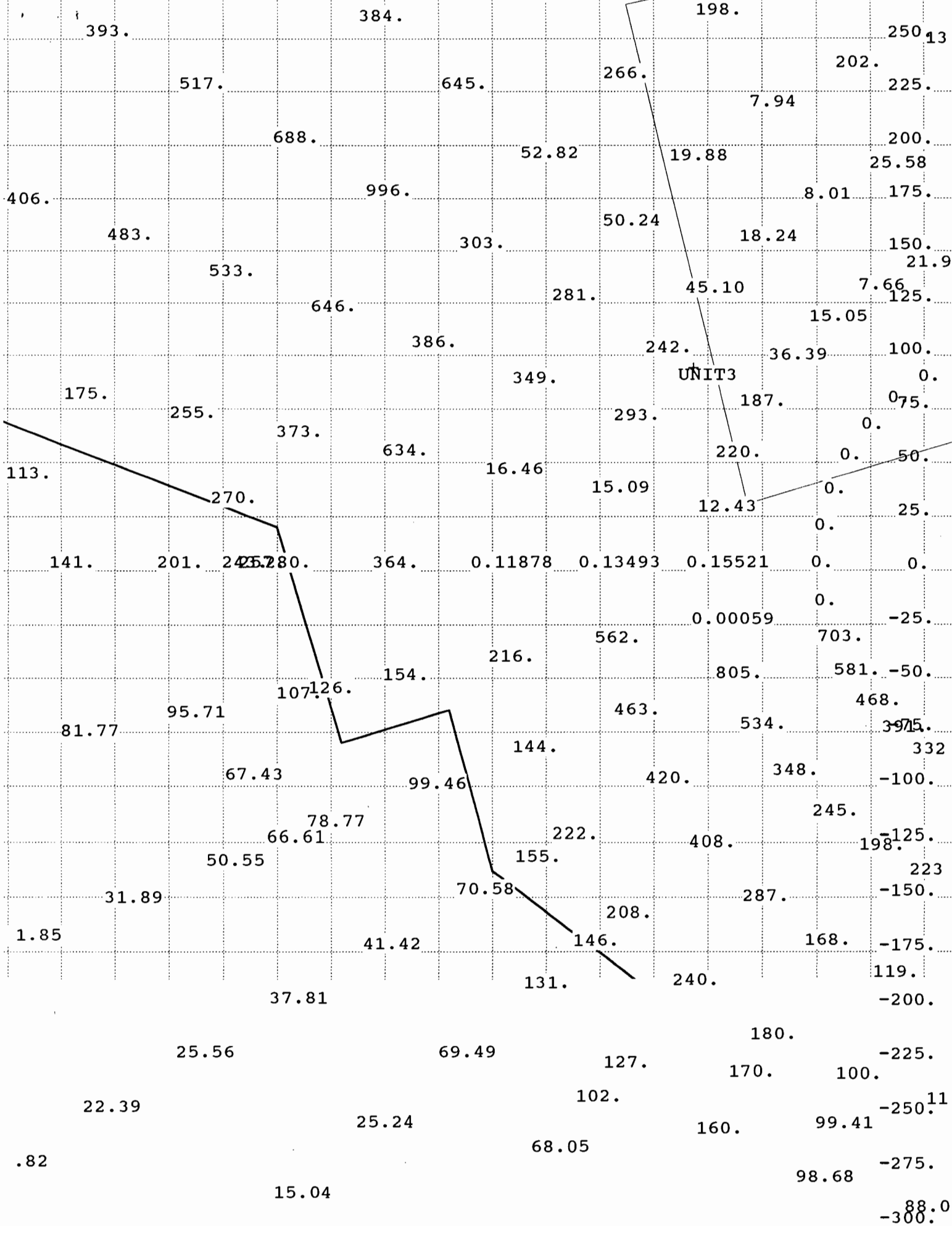
	MET DATA	H2h 24-HOUR			H2h-3 HOUR		
		AAQS=260			AAQS=1330		
		CONC	RECEP (X,Y)		CONC	RECEP (X,Y)	
1986	PENSACOLA	584	0	-325	2165	-52	-295
1987	PENSACOLA	812	0	-325	2551	0	-325
1988	APALACHICOLA	482	0	-325	2371	0	-325
1989	APALACHICOLA	634	0	-325	1785	0	-325
1990	APALACHICOLA	580	0	-325	2224	0	-325

Files: gp286vpd.grf, gp287vpd.grf, gp288vpd.grf, gp289vpd.grf, gp290vpd.grf

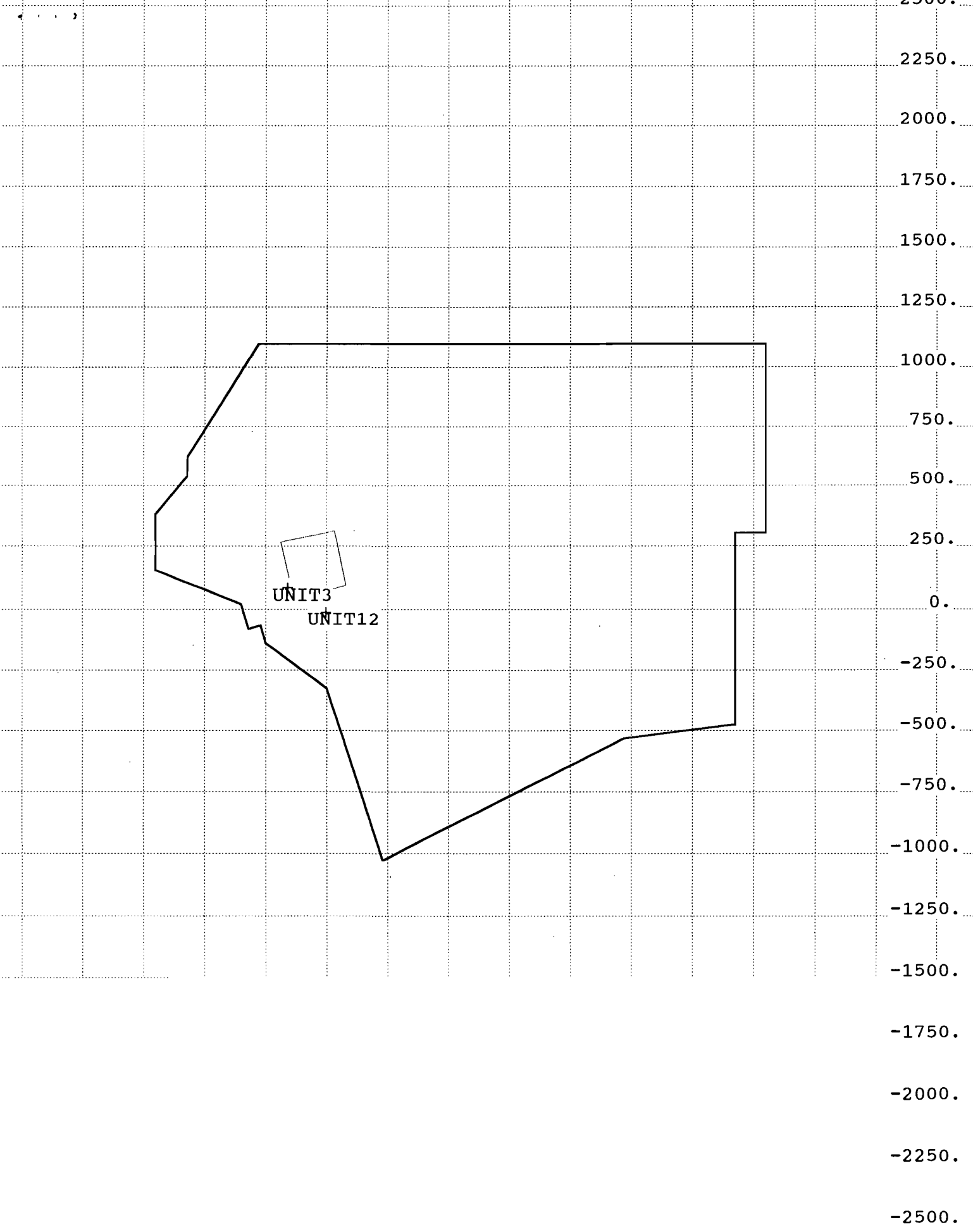
1987 is the limiting year. Maximum value is located on the proposed fenceline (0, -325) located to the south of the stack. The limit on Unit 2 at 100% load is $6.17/(812/260)$ or 1.98 lbs/MMBTU when unit 2 is operating alone



475.-450.-425.-400.-375.-350.-325.-300.-275.-250.-225.-200.-175.-150.-125.-100.-75.-50



-1250. -1000. -750. -500. -250. 0. 250. 500. 750. 1000. 1250. 1500. 1750. 2000. 2250. 2500.



INTEROFFICE MEMORANDUM

(Draft)

Date: 27-Apr-2000 09:31am
From: Jonathan Holtom TAL
Dept:
Tel No:

To: Yi Zhu TAL (ZHU_Y)

Subject: arms upload

Hi Yi,

The following EARS applications are ready for your review and upload to ARMS:

Gulf Power - Scholz - DEP

Gulf Power - Smith - DEP

Thanks for your help, Jonathan.

- ✓ EU 4 Segment 2 SCC Code is invalid.
- ✓ EU 1 Visible Emissions 1 Need Regulation.
- ✓ EU 3 Visible Emissions 1 Need Regulation.
- ✓ EU 1 Pollutant 1 Allowable 1 Need Regulation.
- ✓ Emission Unit3 Control Equipment Number 1 Code .
- ✓ Emissions Unit 5 Emissions Unit Status Code.
- ✓ Emissions Unit 1 Regulation 1 Regulation Type.
- ✓ Emissions Unit 1 Regulation 2 Regulation Type.
- ✓ Emissions Unit 1 Regulation 3 Regulation Type.
- ✓ Emissions Unit 2 Regulation 1 Regulation Type.
- ✓ Emissions Unit 2 Regulation 2 Regulation Type.
- ✓ Emissions Unit 2 Regulation 3 Regulation Type.
- ✓ Emissions Unit 3 Regulation 1 Regulation Type.
- ✓ Emissions Unit 3 Regulation 2 Regulation Type.
- ✓ Emissions Unit 3 Regulation 3 Regulation Type.
- ✓ Emissions Unit 1 Pollutant 1 Emission Factor Unit Code.
- ✓ Emissions Unit 1 Pollutant 2 Emission Factor Unit Code.
- ✓ Emissions Unit 1 Pollutant 3 Emission Factor Unit Code.
- ✓ Emissions Unit 1 Pollutant 4 Emission Factor Unit Code.
- ✓ Emissions Unit 1 Pollutant 5 Emission Factor Unit Code.
- ✓ Emissions Unit 2 Pollutant 1 Emission Factor Unit Code.
- ✓ Emissions Unit 2 Pollutant 2 Emission Factor Unit Code.
- ✓ Emissions Unit 2 Pollutant 3 Emission Factor Unit Code.
- ✓ Emissions Unit 2 Pollutant 4 Emission Factor Unit Code.
- ✓ Emissions Unit 2 Pollutant 5 Emission Factor Unit Code.
- ✓ Emissions Unit 3 Pollutant 1 Emission Factor Unit Code.
- ✓ Emissions Unit 1 Pollutant 1 Allowable Emissions 1 Compliance Method Code.
- ✓ Emissions Unit 1 Pollutant 1 Allowable Emissions 1 Allowable Emissions Unit Code.
- ✓ Emissions Unit 1 Pollutant 1 Allowable Emissions 1 Compliance Test Frequenc
- ✓ Emissions Unit 1 Pollutant 2 Allowable Emissions 1 Compliance Method Code.
- ✓ Emissions Unit 1 Pollutant 2 Allowable Emissions 1 Allowable Emissions.
- ✓ Emissions Unit 1 Pollutant 2 Allowable Emissions 1 Allowable Emissions Unit Code.
- ✓ Emissions Unit 1 Pollutant 2 Allowable Emissions 1 Compliance Test Frequenc
- ✓ Emissions Unit 1 Pollutant 4 Allowable Emissions 1 Compliance Method Code.
- ✓ Emissions Unit 1 Pollutant 4 Allowable Emissions 1 Allowable Emissions Unit Code.
- ✓ Emissions Unit 1 Pollutant 4 Allowable Emissions 1 Compliance Test Frequenc
- ✓ Emissions Unit 1 Pollutant 4 Allowable Emissions 2 Compliance Method Code.
- ✓ Emissions Unit 1 Pollutant 4 Allowable Emissions 2 Allowable Emissions Unit Code.
- ✓ Emissions Unit 1 Pollutant 4 Allowable Emissions 2 Compliance Test Frequenc
- ✓ Emissions Unit 2 Pollutant 1 Allowable Emissions 1 Compliance Method Code.
- ✓ Emissions Unit 2 Pollutant 1 Allowable Emissions 1 Allowable Emissions Unit Code.
- ✓ Emissions Unit 2 Pollutant 1 Allowable Emissions 1 Compliance Test Frequenc
- ✓ Emissions Unit 2 Pollutant 2 Allowable Emissions 1 Compliance Method Code.
- ✓ Emissions Unit 2 Pollutant 2 Allowable Emissions 1 Allowable Emissions.
- ✓ Emissions Unit 2 Pollutant 2 Allowable Emissions 1 Allowable Emissions Unit Code.
- ✓ Emissions Unit 2 Pollutant 2 Allowable Emissions 1 Compliance Test Frequenc
- ✓ Emissions Unit 2 Pollutant 3 Allowable Emissions 1 Compliance Method Code.
- ✓ Emissions Unit 2 Pollutant 3 Allowable Emissions 1 Allowable Emissions Unit Code.
- ✓ Emissions Unit 2 Pollutant 3 Allowable Emissions 1 Compliance Test Frequenc
- ✓ Emissions Unit 2 Pollutant 3 Allowable Emissions 2 Compliance Method Code.
- ✓ Emissions Unit 2 Pollutant 3 Allowable Emissions 2 Allowable Emissions Unit Code.
- ✓ Emissions Unit 2 Pollutant 3 Allowable Emissions 2 Compliance Test Frequenc

Smith - DEP
#1

Emission Unit 1 Visible Emissions 1 Visible Emissions SubType Must Be a 2 digit Number.
Emission Unit 2 Visible Emissions 1 Visible Emissions SubType Must Be a 2 digit Number.
Emission Unit 3 Visible Emissions 1 Visible Emissions SubType Must Be a 2 digit Number.

GULF POWER COMPANY
ONE ENERGY PLACE
PENSACOLA, FLORIDA 32520-0328

To: Jonathan Helton

Company: FDEP

Phone: _____

Fax: 850 922 6979

From: Dwain Waters

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

Phone: 850 444-6527

Fax: 850.444.6217

Date: Nov 24, 1999

Pages including this cover page: 2

Comments: DR certification of NEX Act Plan.

Charles D. McCrary
Chief Production Officer
President
Southern Company Generation

600 North 18th Street / 15N-8170
Post Office Box 2641
Birmingham, Alabama 35291

Tel 205.257.2243
Fax 205.257.5019

November 23, 1999



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

Dear Mr. Fancy:

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

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

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

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

Sincerely,

A handwritten signature in cursive script that reads "Charles D. McCrary".

cc: Ronald W. Gore, Alabama Department of Environmental Management
Ronald C. Methier, Georgia Environmental Protection Division
Dwight Wylie, Mississippi Department of Environmental Quality
James I. Carroll, Jefferson County Department of Health
R. Doug Neeley, U.S. Environmental Protection Agency
Robert Miller, U.S. Environmental Protection Agency



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

Copy: D. Waters - Gulf
J. Hunter - RECO
11/24 E. Middelmeier - NW Dis
B. Thomas - SW Dist
J. Campbell - HCFPC
P. Coner - OGC
H. Rhodes - DARM

NOV 17 1999

RECEIVED

NOV 22 1999

4APT-ARB

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

BUREAU OF AIR REGULATION

Dear Mr. Fancy:

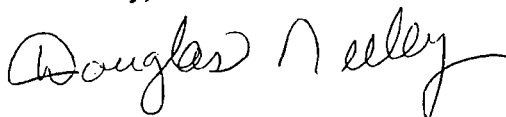
This letter is to follow up on our recent conversation regarding the approval process for the multi-state Phase II Acid Rain NO_x Averaging Plan submitted by participating Southern Company plants to their respective State permitting authorities. Our conversation focused on the status of the proposed averaging plan, should the process of approval through the issuance of permits incorporating the plan not be completed by all the relevant permitting authorities by the Phase II effective date of January 1, 2000.

It is our understanding that the Florida Department of Environmental Protection (FDEP) has set a goal to complete the title V permitting process (i.e., finalize the title V permits) for the Gulf Power plants participating in the Southern Company Phase II NO_x Averaging Plan by the end of this year. There remains the possibility, however, due to title V permitting delays that the FDEP may not approve Southern Company's plan and incorporate the plan into final title V permits by the end of this year.

The Acid Rain Division of the Environmental Protection Agency (EPA) considers a compliance plan submitted with an Acid Rain permit application to be part of the Acid Rain permit application (see 40 CFR 72.31(c)). This would include a Phase II NO_x Averaging Plan; however, it would not include a petition for an alternative emission limitation period, a final alternative emission limitation or a renewal of a final alternative emission limitation. Therefore, the permit application shield provided in the Acid Rain regulations extends to a Phase II NO_x Averaging Plan that is timely and complete (see 40 CFR 72.32(b)). Further, a complete Phase II NO_x Averaging Plan is binding on the owners and operators until issuance or denial of the Acid Rain permit (see 40 CFR 72.32(c)). Under these rule provisions the units included in the Southern Company Phase II NO_x Averaging Plan are required to operate in accordance with the terms of the averaging plan until the final approval of the plan (i.e., when all permitting authorities with jurisdiction over the units in the plan have approved the plan) (see 40 CFR 72.40(b)(2)).

If you have any questions or concerns regarding this matter, please contact Jenny Jachim of the EPA Region 4 staff at (404) 562-9126.

Sincerely,

A handwritten signature in black ink that reads "Douglas Neeley". The signature is written in a cursive style with a long, sweeping tail on the letter "y".

R. Douglas Neeley
Chief
Air & Radiation Technology Branch
Air, Pesticides and Toxics
Management Branch

cc: W. Danny Herrin, Southern Company Services, Inc.
Ronald W. Gore, Alabama Department of Environmental Management
Ronald C. Methier, Environmental Protection Division
James L. Carroll, Jefferson County Department of Health
Dwight Alpern, Acid Rain Division
Robert Miller, Acid Rain Division

INTEROFFICE MEMORANDUM

Date: 03-Nov-1999 05:33pm
From: Waters, Glenn D.
GDWATERS@southernco.com
Dept:
Tel No:

To: Jonathan Holtom (E-mail) (holtom_j@dep.state.fl.us)
CC: Scott M. Sheplak (E-mail) (sheplak_s@dep.state.fl.us)
CC: Vick, James O. (JOVICK@southernco.com)
CC: Herrin, William D. (WDHERRIN@southernco.com)
CC: Reeder, Tracy L. (TLREEDER@southernco.com)

Subject: Gulf Power Response to EPA Comments for Smith Title V

The following comments are submitted and referenced pursuant to those outlined in EPA's comment letter (Elizabeth K. Bartlett) to Scott Sheplak dated October 27, 1999 regarding draft Lansing Smith Title V Permit No. 0050014-001-AV. Gulf Power has no comments regarding other items not referenced below. These items either address typo errors in the permit or policy not directly related to the permit. Gulf Power does not believe any of the items identified by EPA and agreed to below by Gulf Power should constitute an EPA objection to a revised draft of the Smith permit. Gulf Power requests an opportunity to review your response regarding EPA's comments before these issues are finalized.

If you have any questions, please call me at (850) 444-6527 or at my cellular phone at (334) 350-6527.

Sincerely,

G. Dwain Waters. Q.E.P.
Air Quality Programs Coordinator

<<SmithEPAComments.doc>>

EPA Comments October 27, 1999 below:

<<SmithEPACommentsATT138289.doc>>

Gulf Power Response to EPA Comments Dated October 27, 1999 to Scott Sheplak Regarding Lansing Smith Title V Draft Permit No. 0050014-001-AV.

✓ Item #2 references the establishment of periodic monitoring testing protocol. Gulf Power agrees with the language outlined in item #11. This language should be used in referencing any periodic monitoring test protocol. (See item #11).

✓ Item #5 references new EPA policy regarding excess emissions. It would appear that any suggested changes regarding this policy would have to go through Florida rulemaking and a SIP recall before implementation. Due to this, no changes are warranted for the current Smith permit.

Item #6 references the need to monitor the actual amount of sodium carbonate used in the operation of Unit 1 and Unit 2. Sodium Carbonate is not a regulated pollutant nor does it produce any regulated pollutants and the amount used is based on fuel, operational conditions of the boiler and load. Gulf Power does not agree that sodium carbonate is required to be monitored or the amount recorded. (See item 8). No changes to the draft permit are needed for item #6.

✓ Item #7 references the need to establish interim SO₂ limits for Units 1 & 2 before April 1, 2000. Gulf Power agrees that a limit should be established at the current permitted limit. i.e., 6.19 lbs/mbtu SO₂.

✓ Item #8 references the need to establish an annual particulate test protocol based on normal operations of the unit. Gulf Power agrees with the establishment of >50% as a measure to test with sodium carbonate.

✓ Item #10 references the need to further identify the type and content of used oil used for energy recovery at Plant Smith. Gulf Power believes the currently provisions in the permit more than adequately address the monitoring and recordkeeping requirements under Florida rules for used oil. No changes are needed for item #10.

✓ Item #11 references the addition of language to address particulate testing protocol due to provisions outlined under periodic monitoring. Gulf Power accepts this language under periodic monitoring.

✓ Item #12 references the need to further address periodic monitoring for the combustion turbine at Plant Smith. Gulf Power believes the periodic monitoring provisions in the draft permit are adequate to meet the intent of the periodic monitoring rules. These provisions are the same as other similar units in Florida. No changes are needed to the draft permit for item #12.

INTEROFFICE MEMORANDUM

Date: 27-Oct-1999 09:11pm
From: Bartlett.Elizabeth
Bartlett.Elizabeth@epamail.epa.gov
Dept:
Tel No:

To: Jonathan.Holtom (Jonathan.Holtom@dep.state.fl.us)
To: Scott.Sheplak (Scott.Sheplak@dep.state.fl.us)
CC: Danois.Gracy (Danois.Gracy@epamail.epa.gov)
CC: Huey.Joel (Huey.Joel@epamail.epa.gov)
CC: Worley.Gregg (Worley.Gregg@epamail.epa.gov)

Subject: Final Comments on Gulf Power Smith

File is attached. Please contact me if you have any questions.

Elizabeth Bartlett
EPA Region 4
(404)562-9122



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR, PESTICIDES & TOXICS MANAGEMENT DIVISION
61 Forsyth St., S. W.
Atlanta, Georgia 30303
Fax Number: 404/562-9095

Electronic Transmission

MEMORANDUM

DATE: October 27, 1999

SUBJ: Initial EPA Comments
Draft Title V Permit for Gulf Power - Lansing Smith Plant
Lynn Haven, Florida
Permit No. 0050014-001-AV

FROM: Elizabeth K. Bartlett, Environmental Engineer
Operating Source Section, ARTB

TO: Scott Sheplak, FDEP - Tallahassee

Below are initial comments from EPA Region 4 on the above referenced source. Our comments are all general in nature, and no issues were identified that would trigger an objection under 40 CFR Part 70. These comments do not differ significantly from the draft comments that were transmitted to your office on October 20, 1999. Please contact me at your convenience if you have any questions. You may reach me at (404) 562-9122.

1. Statement of Basis - The statement of basis contends that the Department and EPA have previously determined that sources without controls, whose emissions are less than half of the applicable standard, shall test annually. This statement is used as part of the justification for how the facility will address periodic monitoring for particulate matter in the permit. While the permit does adequately address periodic monitoring, the above mentioned statement should be removed from the permit because it is inaccurate. EPA has not made the general

determination that sources without controls, whose emissions are less than half of the applicable standard, need only test annually to achieve adequate periodic monitoring for particulate matter. EPA's determination as to what constitutes adequate periodic monitoring will continue to be made on a case by case basis.

*oh
remove
sentence in
question.*

2. Statement of Basis - The statement of basis indicates that periodic monitoring for particulate matter will be achieved through the use of COMs, where particulate matter stack tests will be required for any calendar quarter in which more than five percent of the COMs data show 20% or greater opacity. Please revise the statement of basis to provide a justification for choosing 20% opacity as the threshold at which particulate matter testing will be required.

*agreed to by
EPA. 1/2 of
standard*

3. Section I, Subsection A - The facility description incorrectly describes the source as having "one combustion turbine (used to drive a single peaking generator)." This should be revised to be consistent with the statement of basis and section III.B which specify "two combustion turbines (used to drive two separate peaking generators) driven by a single jet engine."

4. Section II, Condition 13. - This condition should specifically reference the required components of Appendix TV-3, item 51, which lists the compliance certification requirements of 40 CFR 70.6(c)(5)(iii), to ensure that complete certification information is submitted to EPA. In addition, the telephone number for the Air Enforcement Section should be corrected to read (404)562-9155.

5. Section III, Conditions A.11., A.12., A.13., B.7., B.8. - These conditions address the occurrence of excess emissions from the electric generating units. More specifically, excess emissions resulting from malfunctions are permitted provided that best operational practices to minimize emission are adhered to and the duration of excess emissions are minimized. EPA has recently addressed the issue of excess emissions in a September 20, 1999 policy memorandum from Steven A. Herman, Assistant Administrator for Enforcement and Compliance Assurance and Robert Perciasepe, Assistant Administrator for Air and Radiation. The September 20, 1999 memo reaffirms and supplements the EPA's original policy regarding excess emissions during malfunction, startup, shutdown, and maintenance, which is contained in memoranda from Kathleen Bennett, formerly Assistant Administrator for Air, Noise and Radiation dated September 28, 1982 and February 15, 1983. Please ensure that the permit conditions which address excess emissions are consistent with EPA's policy.

6. Section III, Condition A.3.b. - Condition A.3.b states that the sodium carbonate will be injected at a rate of 420 pounds as hour. Since this condition specifies the methods of operation for this source, the injection rate is an operational limit. In

order for an operational limit to be enforceable as a practical matter there must be a method of establishing compliance with that limit. In this case the most appropriate method of establishing compliance is through record keeping. Therefore, we recommend that the permit require the source to keep records for the rate of sodium carbonate injection.

D.W.
Don't
Like

7. Section III, Condition A.9 - This condition contains the sulfur dioxide emission limits for units 001 and 002. However, these limits do not take effect until April 1, 2000. Since the SIP requires emission limits for sulfur dioxide for fossil fuel fired steam generators, the permit must have emission limits in place for the time period between the issuance of the permit and April 1, 2000.
8. Section III, Condition A.17 - Condition A.3.b states that the supplemental injection of sodium carbonate will be used to maintain visible emissions below the applicable standards. Additionally, condition A.17 requires that all emissions tests be performed while injecting additives consistent with normal operating practices. However, since the sodium carbonate additive will be used to decrease visible emissions, testing while the additive is being injected will most likely not represent the operating conditions at which the highest emissions occur. The worst case conditions will most likely occur just prior to when the additive is needed.

Periodic testing of the source is required in order to evaluate the source's continual compliance status with regard to the emission limits. Testing should therefore be performed while the emission unit is operating in a manner that is representative of the unit's overall operation throughout the period of time since the last emission test. Region 4 was informed by FDEP that the facility has not previously used this method of sodium carbonate injection for control of emissions, and therefore, the facility does not know what percentage of the time the supplemental injection of sodium carbonate will be necessary. Therefore, in order to assure that testing is performed during representative emission unit operation, Region 4 agrees that the following language should be included in the permit:

A.17. Testing While Injecting Additives. If supplemental additives are used greater than 50% of the time that the unit(s) are operated, the owner or operator shall conduct all emissions tests while injecting additives, consistent with normal operating practices approved by the Department. [Rule 62-213.440, F.A.C.]

9. Section III, Conditions A.20 and A.30(b) - Condition A.20 states during the particulate matter emission test, there must be a minimum sample volume of 30

dry standard cubic feet. Condition A.30(b) states the minimum sample volume will be 25 dry standard cubic feet, unless otherwise specified. In order to clarify which condition is applicable, we recommend adding a permitting note to Condition A.30(b) to cross-reference the more stringent requirements of A.20.

Add
D.N.

10. Section III, Condition A.36(b) - Please clarify whether the used oil generated by Gulf Power is generated on-site at the Lansing Smith Plant, or off-site at other Gulf Power plants. Inclusion of this information may help inspectors in identify the type of records maintained to document compliance with PCB generator/marketer requirements. In addition, this condition should reference boilers 001 and 002, not 004 and 005.
11. Section III, Condition A.38 - Please revise this condition to include the underlined language as follows: “The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions and, where practicable, shall be performed while operating at conditions representative of those showing greater than 20% opacity.”
12. Section III, Condition B.18 - This condition requires that periodic monitoring for visible emissions from the combustion turbines consist of performing a Method 9 test when the units operate for more than 400 hours in any calendar year, and additionally for every 150 hours of operation thereafter. Since the combustion turbines are used to drive peaking generators, the hours of operation will be limited. Potentially, several months or even years could pass between triggering a Method 9 performance test. Therefore, in order to provide a more adequate form of periodic monitoring and a basis for annual compliance certifications, we recommend that a qualitative observation of opacity be performed and recorded on a regular basis (e.g. weekly while operating), until the initial 400 hours has been reached. The qualitative observations shall take place while the combustion turbines are in operation. The records of these observations should indicate whether or not any abnormal visible emissions are detected and include color, duration, and density of the plume, as well as the cause and corrective action taken for any abnormal visible emissions. If an abnormal visible emission is detected, a Method 9 survey would be conducted.
13. Appendix CP-1, Section IV, Condition A.2 - The regulatory citation for the applicable NOx emission limit should refer to 40 CFR 76.7 rather than 40 CFR 76.5(a)(1).

D.W.
ridiculous

RFC-822-headers:

Received: from epic50.dep.state.fl.us ([199.73.195.8])
by mail.epic1.dep.state.fl.us (PMDF V5.2-32 #37976)
with ESMTP id <01JHN5X8FA0Y0014PV@mail.epic1.dep.state.fl.us>; Wed,
27 Oct 1999 21:07:54 EDT

Received: from merlin.rtpnc.epa.gov ([134.67.208.148])
by mail.epic50.dep.state.fl.us (PMDF V5.2-32 #31508)
with ESMTP id <01JHN5Y9TAXI005WH2@mail.epic50.dep.state.fl.us>; Wed,
27 Oct 1999 21:08:51 -0400 (EDT)

Received: from myrtle.rtpnc.epa.gov by epamail.epa.gov (PMDF V5.1-12 #26439)
with ESMTP id <0FKA00424GDXLV@epamail.epa.gov>; Wed,
27 Oct 1999 21:07:29 -0400 (EDT)

Received: from ccmil.epamail.epa.gov by epamail.epa.gov (PMDF V5.1-12 #26438)
id <0FK900301RH9NJ@epamail.epa.gov>; Wed, 27 Oct 1999 12:09:31 -0400 (EDT)

INTEROFFICE MEMORANDUM

Date: 20-Oct-1999 11:13pm
From: Bartlett.Elizabeth
Bartlett.Elizabeth@epamail.epa.gov
Dept:
Tel No:

To: Jonathan.Holtom (Jonathan.Holtom@dep.state.fl.us)
CC: Sheplak_S (Sheplak_S@dep.state.fl.us)

Subject: Re: Gulf Power - Smith Testing with additives

Jonathan - Attached are my draft comments for Gulf Power Smith. These should serve to get our comments in before the end of the public comment period. I will clean them up and send a more official copy in the next day or so. There will be a couple of items that aren't in the version I'm sending you regarding some clarification and type-o's, but nothing significant.

Please call if you have any questions.
Elizabeth Bartlett
EPA Region 4
(404)562-9122

**** DRAFT **** DRAFT **** DRAFT **** DRAFT **** DRAFT **** DRAFT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Atlanta, Georgia 30303
Fax Number: 404/562-9095

Electronic Transmission

MEMORANDUM

DATE: October 20, 1999

SUBJ: Initial EPA Comments
Draft Title V Permit for Gulf Power - Lansing Smith Plant
Lynn Haven, Florida
Permit No. 0050014-001-AV

FROM: Elizabeth K. Bartlett, Environmental Engineer
Operating Source Section, ARTB

TO: Scott Sheplak, FDEP - Tallahassee

Below are initial comments from EPA Region 4 on the above referenced source. Our comments are divided into two categories: 1) Significant Comments and 2) General Comments.

Significant comments are defined as those comments that would trigger an objection under

40 CFR Part 70. Please contact me at your convenience in order that we may seek to resolve these issues prior to your submittal of a proposed permit for this source. You may reach me at (404) 562-9122. Thank you for your attention to this matter.

1. Statement of Basis - The statement of basis contends that the Department and EPA have previously determined that sources without controls, whose emissions

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are less than half of the applicable standard, shall test annually. This statement is used as part of the justification for how the facility will address periodic monitoring for particulate matter in the permit. While the permit does adequately address periodic monitoring, the above mentioned statement should be removed from the permit because it is inaccurate. EPA has not made the general determination that sources without controls, whose emissions are less than half of the applicable standard, need only test annually to achieve adequate periodic monitoring for particulate matter. EPA's determination as to what constitutes adequate periodic monitoring will continue to be made on a case by case basis.

2. Section I, Subsection A - The facility description incorrectly describes the source as having "one combustion turbine (used to drive a single peaking generator)." This should be revised to be consistent with the statement of basis and section III.B which specify "two combustion turbines (used to drive two separate peaking generators) driven by a single jet engine."
3. Section II, Condition 13., page 7 - This condition should specifically reference the required components of Appendix TV-3, item 51, which lists the compliance certification requirements of 40 C.F.R. 70.6(c)(5)(iii), to ensure that complete certification information is submitted to EPA. In addition, the telephone number for the Air Enforcement Section should be corrected to read (404)562-9155.
4. Section III, Condition A.17 - Condition A.3.b states that the supplemental injection of sodium carbonate will be used to maintain visible emissions below the applicable standards. Additionally, condition A.17 requires that all emissions tests be performed while injecting additives consistent with normal operating practices. However, since the sodium carbonate additive will be used to decrease visible emissions, testing while the additive is being injected will most likely not represent the operating conditions at which the highest emissions occur. The worst case conditions will most likely occur just prior to when the additive is needed.

Periodic testing of the source is required in order to evaluate the source's continual compliance status with regard to the emission limits. Testing should therefore be performed while the emission unit is operating in a manner that is representative of the unit's overall operation throughout the period of time since the last emission test. Region 4 was informed by FDEP that the facility has not previously used this method of sodium carbonate injection for control of emissions, and therefore, the facility does not know what percentage of the time

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the supplemental injection of sodium carbonate will be necessary. Therefore, in order to assure that testing is performed during representative emission unit operation, Region 4 agrees that the following language should be included in the permit:

A.17. Testing While Injecting Additives. If supplemental additives are used greater than 50% of the time that the unit(s) are operated, the owner or operator shall conduct all emissions tests while injecting additives, consistent with normal operating practices approved by the Department.

[Rule 62-213.440, F.A.C.]

5. Section III, Condition A.38, page 23 - Please revise this condition to include the underlined language as follows: “The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions and, where practicable, shall be performed while operating at conditions representative of those showing greater than 20% opacity.”
6. Appendix CP-1, Section IV, Condition A.2 - The regulatory citation for the applicable NOx emission limit should refer to 40 CFR 76.7 rather than 40 CFR 76.5(a)(1).
7. *Emission Units & Conditions, A.3.b.* - Condition A.3.b states that the sodium carbonate will be injected at a rate of 420 pounds as hour. Since this condition specifies the methods of operation for this source, the injection rate is an operational limit. In order for an operational limit to be enforceable as a practical matter there must be a method of establishing compliance with that limit. In this case the most appropriate method of establishing compliance is through record keeping. Therefore, the permit should require the source to keep records for the rate of sodium carbonate injection.
8. *Emission Units & Conditions, A.9.* - Condition A.9 contains the sulfur dioxide emission limits for units # 1 and # 2. In order to eliminate exceedances of Florida’s ambient air quality standards, the sulfur dioxide limits that have been included in the permit are more stringent than that which is mandated by SIP rule 62-296.405, F.A.C.. However, these limits do not take effect until April 1, 2000, and therefore, for the time period between the issuance of the permit and April 1, 2000, the permit does not contain a sulfur dioxide emission limit. Since these units are also subject to rule 62-296.405, F.A.C., the permit should contain the

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**** DRAFT **** DRAFT **** DRAFT **** DRAFT **** DRAFT **** DRAFT

sulfur dioxide limit from rule 62-296.405. These limit will be effective until the more stringent limits take effect on April 1, 2000.

9. Periodic Monitoring - The statement of basis indicates that periodic monitoring for particulate matter will be achieved through the use of COMs. More specifically, for any calendar quarter in which more than five percent of the COMs data show 20% or greater opacity, a steady-state particulate matter stack test will be required to be performed within the following quarter. While the AES does concur with the periodic monitoring approach in this case, it remains unclear exactly why 20% opacity was chosen as the threshold for triggering the emission test. Therefore, the statement of basis should also provide a justification for choosing 20% as the periodic monitoring opacity threshold.
10. *Emission Units & Conditions, A.11., A.12., A.13., B.7., B.8.* - These conditions address the occurrence of excess emissions from the electric generating units. More specifically, excess emission resulting from malfunction are permitted provided that best operational practices to minimize emission are adhered to and the duration of excess emissions are minimized. EPA has recently addressed the issue of excess emissions in a September 20, 1999 policy memorandum from Steven A. Herman, Assistant Administrator for Enforcement and Compliance Assurance and Robert Perciasepe, Assistant Administrator for Air and Radiation. The September 20, 1999 memo reaffirms and supplements the EPA's original policy regarding excess emissions during malfunction, startup, shutdown, and maintenance, which is contained in memoranda from Kathleen Bennett, formerly Assistant Administrator for Air, Noise and Radiation dated September 28, 1982 and February 15, 1983. The permit conditions that address excess emissions should be consistent with EPA's policy.
11. *Emission Units & Conditions, B.18.* - Condition B.18 requires that periodic monitoring for visible emissions from the combustion turbines consist of performing a Method 9 test when the units operate for more than 400 hours in any calendar year, and additionally for every 150 hours of operation thereafter. Since the combustion turbines are used to drive peaking generators, the hours of operation will be limited. Potentially, several months or even years could pass between triggering a Method 9 performance test. Therefore, in order to provide a more adequate form of periodic monitoring, a qualitative observation of opacity should be performed and recorded for any month in which the combustion turbines operate and operation is limited to less than 150 hours. The qualitative observations shall take place while the combustion turbines are in operation. The

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records of these observations should indicate whether or not any abnormal visible emissions are detected and include color, duration, and density of the plume, as well as the cause and corrective action taken for any abnormal visible emissions. If an abnormal visible emission is detected, a Method 9 survey shall be conducted.

**** DRAFT **** DRAFT **** DRAFT **** DRAFT **** DRAFT **** DRAFT

RFC-822-headers:

Received: from epic50.dep.state.fl.us ([199.73.195.8])

by mail.epic1.dep.state.fl.us (PMDF V5.2-32 #37976)

with ESMTP id <01JHDI4F1RUA003C6Z@mail.epic1.dep.state.fl.us>; Wed,
20 Oct 1999 23:08:35 EDT

Received: from merlin.rtpnc.epa.gov ([134.67.208.148])

by mail.epic50.dep.state.fl.us (PMDF V5.2-32 #31508)

with ESMTP id <01JHDI4T2OY6004RYN@mail.epic50.dep.state.fl.us>; Wed,
20 Oct 1999 23:09:28 -0400 (EDT)

Received: from myrtle.rtpnc.epa.gov by epamail.epa.gov (PMDF V5.1-12 #26439)

with ESMTP id <0FJX00IX3MQSDB@epamail.epa.gov>; Wed,

20 Oct 1999 22:57:28 -0400 (EDT)

Received: from ccmil.epamail.epa.gov by epamail.epa.gov (PMDF V5.1-12 #26438)

id <0FJX00501L14DD@epamail.epa.gov>; Wed, 20 Oct 1999 22:54:35 -0400 (EDT)

One Energy Place
Pensacola, Florida 32520

850.444.6111

Jonathan Holton
RECEIVED

SEP 22 1999

BUREAU OF AIR REGULATION
GULF POWER
A SOUTHERN COMPANY

Certified Mail

September 21, 1999

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

RE: Title V Public Notice
Plant Lansing Smith: 0050014-001-AV

Attached, please find a copy of the proof of publication (newspaper affidavit) for the "public notice of intent to issue Title V air operation permit" for the Lansing Smith Electric Generating Plant. The public notice was made on September 20, 1999 in the Panama City News Herald. This proof of publication is being forwarded to you to meet the requirement outlined in your letter to Mr. Robert Moore dated September 16, 1999.

If you have any questions or need further information regarding the matter, please call me at (850) 444-6527.

Sincerely,

G. Dwain Waters Q.E.P.

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

c: Robert G. Moore, Gulf Power Company
James O Vick, Gulf Power Company
Kim Flowers Gulf Power Company
Tracy Reeder, Gulf Power Company

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 _____

Ken Carpenter _____, who on oath says that (s)he

is Advertising Director _____ of the News Herald, a daily

newspaper published at Panama City, in Bay County, Florida; that the attached copy

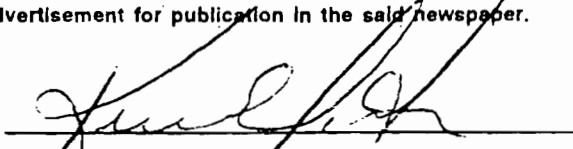
of advertisement, being a Legal Advertisement _____

in the matter of Public Notice _____
00500.14-001-AV

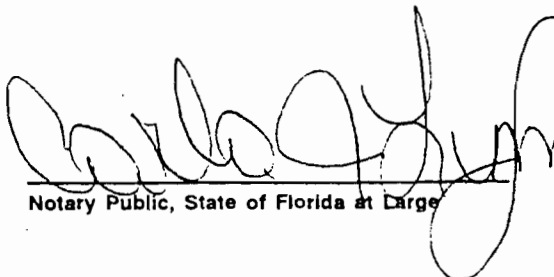
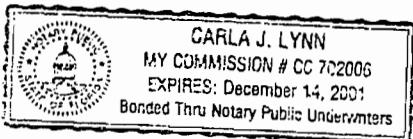
In the _____

Court, was published in said newspaper in the issues of _____
September 20, 1999

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 a second class mail matter at the post office in Panama City in said Bay County, Florida, for a period of one year next preceding the first publication of the attached copy of the advertisement, all in accordance with the provisions of section 49.03, Florida Statutes; and affiant further says that (s)he 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 to and subscribed before me this 20th day of September
A. D., 1999 by Ken Carpenter, Advertising Director of The
News Herald, who is personally known to me or has produced _____
as identification.


Notary Public, State of Florida at Large

5266
PUBLIC NOTICE OF INTENT
TO ISSUE TITLE V AIR OPER-
ATION PERMIT
STATE OF FLORIDA
DEPARTMENT OF ENVIRON-
MENTAL PROTECTION

Title Revised DRAFT Permit
No.: 0050014-001-AV
Lansing Smith Electric
Generating Plant
Bay County

The Department of Environ-
mental Protection (permitting
authority) gives notice of its in-
tent to issue a Title V air oper-
ation permit to Gulf Power
Company for the Lansing
Smith Electric Generating
Plant located at 4300 County
Road, Bay County. This permit
incorporates the Phase I/II
NOx standards into the Title IV
Acid Rain Part pursuant to
Rule 62-214.360(6), Florida
Administrative Code (F.A.C.).
The applicant's name and ad-
dress are: Gulf Power Compa-
ny, One Energy Place, Pensa-
cola, Florida 32520.

The permitting authority will is-
sue the Title V PROPOSED
Permit, and subsequent Title V.

FINAL Permit, in accordance
with the condition of the Title V
DRAFT Permit unless a re-
sponse received in accordance
with the following procedures
results in a different decision or
significant change of
terms or conditions.

The permitting authority will
accept written comments con-
cerning the proposed Title V
DRAFT Permit issuance action
for a period of 30 (thirty) days
from the date of publication of
this Notice. Written comments
should be provided to the De-
partment's Bureau of Air Regu-
lation, 2600 Blair Stone Road,
Mail Station #5505, Tallahas-
see, Florida 32399-2400. Any
written comments filed shall
be made available for public
inspection. If written comments
received result in a significant
change in this DRAFT
Permit, the permitting authority
shall issue a Revised DRAFT
Permit and require, if applica-
ble, another Public Notice.

A person whose substantial in-
terests are affected by the pro-
posed permitting decision
may petition for an administra-
tive hearing in accordance
with Sections 120.569 and
120.57 of the Florida Statutes
(F.S.). The petition must con-
tain the information set forth
below and must be filed
(received) in the Office of Gen-
eral Counsel of the Department
of Environmental Protection,
3900 Commonwealth
Boulevard, Mail Station #35,
Tallahassee, Florida
32399-3000 (Telephone:
850/488-9730; Fax:
850/487-4938). Petitions filed

by any persons other than
those entitled to written notice
under Section 120.60(3), F.S.,
must be filed within fourteen
days of publication of the public
notice or within fourteen
days of receipt of the notice of
intent, 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 four-
teen days of receipt of that no-
tice, regardless of the date of
publication. A petitioner shall

modification of the agency's
proposed action; and,

(g) A statement of the relief
sought by the petitioner, stating
precisely the action 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 au-
thority's final action may be dif-
ferent from the position taken
by it in this notice of intent.
Persons whose substantial in-
terests will be affected by any
such final decision of the per-
mitting authority on the ap-
plication have the right to petition
to become a party to the
proceeding in accordance
with the requirements set forth
above.

Mediation is not available to
this proceeding.

In addition to the above, pur-
suant to 42 United States
Code (U.S.C.) Section
7661d(b)(2), any person ma-
petition the Administrator of
the EPA within 60 (sixty) day
of the expiration of the Admin-
istrator's 45 (forty-five) day re-
view period as established in
42 U.S.C. Section 7661d(b)(1)
to object to issuance of an
permit. Any petition shall be
based only on objections to
the permit that were raised
with reasonable specificity
during the 30 (thirty) day pub-
comment period provide
in this notice, unless the pe-
titioner demonstrates to the Ad-
ministrator of the EPA that
was impracticable to raise
such objections within the
comment period or unless the
grounds for such objection
arose after the comment pe-
od. Filing of a petition with the
Administrator of the EPA does
not stay the effective date

CARLA J. LYNN
MY COMMISSION # CC 702006
EXPIRES: December 14, 2001
Bonded Thru Notary Public Underwriters

[Handwritten Signature]
Notary Public, State of Florida at Large

BEST AVAILABLE COPY

days of receipt of the notice of intent, 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 fourteen 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 applicable 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code (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; 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 petitioner's substantial rights will be affected by the agency determination;
- (c) A statement of how and when the petitioner received notice of the agency action or proposed action;
- (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, as well as the rules and statutes which entitle petitioner to relief; and
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or

tioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62.213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

PERMITTING AUTHORITY:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive,
Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

AFFECTED DISTRICT/LOCAL PROGRAM:
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida
32501-5794
Telephone: 850/595-8300
Fax: 850/595-4417

The complete project file includes the revised DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.A. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.
September 20, 1999

INTEROFFICE MEMORANDUM

Date: 15-Sep-1999 09:38am
From: Waters, Glenn D.
GDWATERS@southernco.com
Dept:
Tel No:

To: Clair H. Fancy (E-mail) (fancy_c@dep.state.fl.us)
To: Jonathan Holtom (E-mail) (holtom_j@dep.state.fl.us)

Subject: Smith Statement of Basis Language

1. Per our conversation this morning, please find the following suggested language on PRIME which should follow the sentence "Although Gulf Power contends that these limits ...and still meet the permit issuance deadline that will enable the use of the Southern Company's requested multistate Acid Rain NOx averaging plan."

The above limits may be revised upon adequate demonstration and EPA approval of the ISC-PRIME model for Plant Smith. Any revision of the limits per a ISC-PRIME demonstration will not trigger New Source Review.

2. Under Periodic Monitoring for the combustion turbines... change any given federal fiscal year (Oct-Sept) to: calendar year. (This will allow for easy tracking). The permit will also need to be changed at B.18.

RFC-822-headers:

Received: from epic50.dep.state.fl.us ([199.73.238.44])

by mail.epic1.dep.state.fl.us (PMDF V5.2-32 #37976)

with ESMTP id <01JFZTIJQOMG0012DL@mail.epic1.dep.state.fl.us>; Wed,
15 Sep 1999 09:35:43 EDT

Received: from alxapex03.southernco.com ([146.126.51.51])

by mail.epic50.dep.state.fl.us (PMDF V5.2-32 #31508)

with ESMTP id <01JFZTJXH5TE0014SG@mail.epic50.dep.state.fl.us>; Wed,
15 Sep 1999 09:36:50 -0400 (EDT)

Received: by alxapex03.southernco.com with Internet Mail Service (5.5.2448.0)
id <S5WLYXKQ>; Wed, 15 Sep 1999 08:37:46 -0500

X-Mailer: Internet Mail Service (5.5.2448.0)

INTEROFFICE MEMORANDUM

Date: 15-Sep-1999 09:48am
From: Waters, Glenn D.
GDWATERS@southernco.com
Dept:
Tel No:

To: Clair H. Fancy (E-mail) (fancy_c@dep.state.fl.us)
To: Jonathan Holtom (E-mail) (holtom_j@dep.state.fl.us)

Subject: Crist Objection Letter Comments

Per our conversation this morning, below are several comments and suggestions on FDEP's letter to EPA regarding the Crist Objection Letter.

1. Cover Page : Check spelling of David McNeal.
2. Add a permit note under conditions B.17 and C.17 to reflect the same language as your comment under EPA Comment #2, i.e. "We have agreed to accept the test done during the annual RATA as satisfaction of this requirement, provided all other testing requirements specified in the permit are met."
3. Under EPA Comment #4. B.38 language and C.39 language: Delete "and where possible, shall be performed while operating at conditions representative to those showing greater than 20%(30% for Crist 7) opacity."

RFC-822-headers:

Received: from epic50.dep.state.fl.us ([199.73.238.44])

by mail.epic1.dep.state.fl.us (PMDF V5.2-32 #37976)

with ESMTP id <01JFZTT25P0G0012DL@mail.epic1.dep.state.fl.us>; Wed,
15 Sep 1999 09:44:11 EDT

Received: from alxapex03.southernco.com ([146.126.51.51])

by mail.epic50.dep.state.fl.us (PMDF V5.2-32 #31508)

with ESMTP id <01JFZTUFU29S0014SG@mail.epic50.dep.state.fl.us>; Wed,
15 Sep 1999 09:45:18 -0400 (EDT)

Received: by alxapex03.southernco.com with Internet Mail Service (5.5.2448.0)

id <S5WLYXTF>; Wed, 15 Sep 1999 08:46:14 -0500

X-Mailer: Internet Mail Service (5.5.2448.0)

INTEROFFICE MEMORANDUM

Date: 15-Sep-1999 10:33am
From: Waters, Glenn D.
GDWATERS@southernco.com
Dept:
Tel No:

To: Clair H. Fancy (E-mail) (fancy_c@dep.state.fl.us)
To: Jonathan Holtom (E-mail) (holtom_j@dep.state.fl.us)

Subject: Smith Permit Corrections

Per our conversation this morning, please find the following suggested changes for the Smith Title V permit:

A.9 Add compliance date to start at April 1, 2000.

A.38 Delete: "and where possible, shall be performed while operating at conditions representative to those showing greater than 20% opacity"

B.18 Change federal fiscal year to Calendar year.

Page 31 (A.3 1. is the same as A.5) You may want to delete one of them.

That's it. Thanks for your patience. I'll start working on getting the public notice ready.

RFC-822-headers:

Received: from epic5.dep.state.fl.us ([199.73.143.30])
by mail.epic1.dep.state.fl.us (PMDF V5.2-32 #37976)
with ESMTP id <01JFZVGORH4O0013RO@mail.epic1.dep.state.fl.us>; Wed,
15 Sep 1999 10:31:29 EDT

Received: from alxapex03.southernco.com ([146.126.51.51])
by mail.epic5.dep.state.fl.us (PMDF V5.2-32 #31508)
with ESMTP id <01JFZVJR7HFM001BU1@mail.epic5.dep.state.fl.us>; Wed,
15 Sep 1999 10:33:58 -0400 (EDT)

Received: by alxapex03.southernco.com with Internet Mail Service (5.5.2448.0)
id <S5WLYZ1J>; Wed, 15 Sep 1999 09:33:31 -0500

X-Mailer: Internet Mail Service (5.5.2448.0)

INTEROFFICE MEMORANDUM

Date: 15-Sep-1999 10:58am
From: Waters, Glenn D.
GDWATERS@southernco.com
Dept:
Tel No:

To: Clair H. Fancy (E-mail) (fancy_c@dep.state.fl.us)
To: Jonathan Holtom (E-mail) (holtom_j@dep.state.fl.us)

Subject: Smith Table 2-1 Changes

Please find fax send by GDW to Clair regarding table changes for SO2 for Smith Table 2-1. The suggested changes are identical to those in the Crist permit. Also please note that if you get a chance to revise the Scholz Table 2-1 , it also needs to be corrected. Call me at (850) 444-6527 if you have questions or if we need to talk more on the table revisions.

See today's fax.

RFC-822-headers:

Received: from epic50.dep.state.fl.us ([199.73.238.44])
by mail.epic1.dep.state.fl.us (PMDF V5.2-32 #37976)
with ESMTP id <01JFZWCU31H00013RO@mail.epic1.dep.state.fl.us>; Wed,
15 Sep 1999 10:56:37 EDT

Received: from alxapex03.southernco.com ([146.126.51.51])
by mail.epic50.dep.state.fl.us (PMDF V5.2-32 #31508)
with ESMTP id <01JFZWE7SNI40016OK@mail.epic50.dep.state.fl.us>; Wed,
15 Sep 1999 10:57:44 -0400 (EDT)

Received: by alxapex03.southernco.com with Internet Mail Service (5.5.2448.0)
id <S5WLYZ7V>; Wed, 15 Sep 1999 09:58:40 -0500

X-Mailer: Internet Mail Service (5.5.2448.0)

INTEROFFICE MEMORANDUM

Date: 16-Sep-1999 10:42am
From: Waters, Glenn D.
GDWATERS@southernco.com
Dept:
Tel No:

To: Scott M. Sheplak (E-mail) (sheplak_s@dep.state.fl.us)
CC: Clair H. Fancy (E-mail) (fancy_c@dep.state.fl.us)
CC: Jonathan Holtom (E-mail) (holtom_j@dep.state.fl.us)

Subject: Smith Draft Title V & Crist Objection Response

All documents reviewed yesterday look good. The only remaining question is in regards to the Table 2-1 SO2 section. Otherwise, Gulf is satisfied with all. I will proceed today with Indent to Issue notice in the Panama City paper. Please let me know ASAP if I should hold off. Thanks for your patience and willingness to work with us on many of these sensitive issues. Let me know if you hear anything from EPA . Thanks again.

RFC-822-headers:

Received: from epic50.dep.state.fl.us ([199.73.238.44])

by mail.epic1.dep.state.fl.us (PMDF V5.2-32 #37976)

with ESMTP id <01JG1A4HQ3P200065T@mail.epic1.dep.state.fl.us>; Thu,
16 Sep 1999 10:41:33 EDT

Received: from alxapex03.southernco.com ([146.126.51.51])

by mail.epic50.dep.state.fl.us (PMDF V5.2-32 #31508)

with ESMTP id <01JG1A5VH4SI001CB0@mail.epic50.dep.state.fl.us>; Thu,
16 Sep 1999 10:42:40 -0400 (EDT)

Received: by alxapex03.southernco.com with Internet Mail Service (5.5.2448.0)

id <S5WLZN2F>; Thu, 16 Sep 1999 09:43:36 -0500

X-Mailer: Internet Mail Service (5.5.2448.0)

The Department and EPA have previously determined that sources without controls, whose emissions are less than half of the applicable standard, shall test annually. Given the historically low documented PM emissions combined with the company's agreement to conduct a PM stack test following any quarter in which their COMs data shows that greater than 5% of the readings are greater than half of their opacity limit, The Department believes that periodic monitoring for particulate matter is more than reasonably addressed.

Units 1 and 2 are utilizing CEMS for compliance purposes for NO_x, SO₂ and opacity.

In order to eliminate violations of Florida's ambient air quality standards off of the plant property, the allowable sulfur dioxide emissions limits for these units have been reduced, through the use of the ISC dispersion model, to the following levels:

<u>Unit No.</u>	<u>Emissions Limit</u>
-001, alone	2.10 lbs/MMBtu
-002, alone	2.70 lbs/MMBtu
-001 & -002, combined	4.50 lbs/MMBtu

Although Gulf Power contends that these limits would not have needed to be reduced this low if they had been allowed to utilize the ISC - Prime model, there is not enough time to obtain a case-by-case approval for it's use and still meet the permit issuance deadline that will enable the use of the Southern Company's requested multi-state Acid Rain NO_x averaging plan. — ①

Emissions unit number -003 consists of a single engine used to drive two simple cycle combustion turbines (each with its own stack) manufactured by Pratt and Whitney, that are used as a peaking units. They are designated as combustion turbine A & combustion turbine B. Each combustion turbine is connected to a separate generator. The engine is rated at a maximum heat input of 542 million Btu per hour (MMBtu/hour) while being fueled by No. 2 fuel oil with a maximum sulfur content of 0.5%, by weight. Emissions from these combustion turbines are uncontrolled. This emissions unit is regulated under Rule 62-210.300, F.A.C., Permits Required. These turbines are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines.

Periodic monitoring for the combustion turbines will consist of an EPA method 9 opacity test. Upon exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given ~~fiscal year (October 1 through September 30)~~ calendar year, the owner or operator shall conduct a visible emissions test on each of these combustion turbines while firing fuel oil. These tests shall be performed within 20 days of exceeding such operating hours.

The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emissions limits and to aid in determining future rule applicability. A note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required to demonstrate at what percentage of the rated capacity that the emissions unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of process variables for emissions tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

For Smith, Appadix
PA-1, Patrol Area
Needs minor updates
Before mailing.

Sorry, Just
remembered.

Very minor edits Excellent
work!

Changes to
Smith

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6)-minute periods, during the 3-hour period of excess emissions allowed for boiler cleaning and load changes, at units which have installed continuous opacity monitors.

[Rule 62-210.700(3), F.A.C.]

{Permitting Note: Load changes may be demonstrated by monitoring megawatt output.}

A.7. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(b), F.A.C.]

{Permitting Note: The averaging time shall correspond to the cumulative sample time, as specified in the reference test method (see specific condition **A.20.**)}

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

[Rule 62-210.700(3), F.A.C.]

starting April 1, 2000,

A.9. Sulfur Dioxide. Sulfur dioxide emissions shall not exceed the following emissions limitations, as measured by applicable compliance methods:

<u>Unit No.</u>	<u>Emissions Limit</u>
-001, alone	2.10 lbs/MMBtu
-002, alone	2.70 lbs/MMBtu
-001 & -002, combined	4.50 lbs/MMBtu

[Rules 62-204.220(1) & 62-204.240(1), F.A.C.; and, applicant request.]

A.10. Sulfur Dioxide - Sulfur Content. The sulfur content of the No. 2 fuel oil or the "on-specification" used oil shall not exceed 0.5 percent, by weight, as measured by applicable test methods.

[Applicant request in initial Title V permit application received June 14, 1996.]

Excess Emissions

A.11. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

A.38. Periodic Monitoring Requirements. Periodic monitoring for particulate matter shall be COMs. For any calendar quarter in which more than five percent of the COMs readings show 20% or greater opacity (excluding start-up, shut-down and periods of COMs outages), a steady state particulate matter stack test shall be performed and submitted within the following calendar quarter. The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions, and, where possible, shall be performed while operating at conditions representative to those showing greater than 20% opacity. Units are not required to be brought on-line solely for the purpose of performing this special compliance test. If the unit does not operate in the following quarter, the special compliance test may be postponed until the unit is brought back on-line. Once back on-line, the special test shall be performed within 20 days.

[Rule 62-213.440(4), F.A.C.]

B.17. Test Reports.

- (a) 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.
- (b) 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.

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

Miscellaneous Conditions

B.18. Periodic Monitoring Requirements. The owner or operator shall conduct testing for visible emissions, using EPA Method 9, while the combustion turbine is operating at 90-100 percent of its capacity, according to the following schedule:

Upon exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given ^{calendar} ~~federal fiscal year (October 1 through September 30)~~, the owner or operator shall conduct a visible emissions test on each of these combustion turbines while firing fuel oil. These tests shall be performed within 20 days of exceeding such operating hours.

Regardless of the number of hours of operation on fuel oil, at least one compliance test shall be conducted on each combustion turbine every five years, coinciding with the term of this operation permit.

[Rules 62-213.440(4) and 62-297.310(7), F.A.C.]

GULF POWER COMPANY
ONE ENERGY PLACE
PENSACOLA, FLORIDA 32520-0328

To: Clair Fancey

Company: FDSP

Phone: _____

Fax: 850.992-6979

From: Dwain Waters

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

Phone: 850.444.6527

Fax: 850.444.6217

Date: Sept. 15, 1999

Pages including this cover page: 2

Comments: Table 2-1 Charges for Smith

Smith should have some language.

Table 2-1, Summary of Compliance Requirements

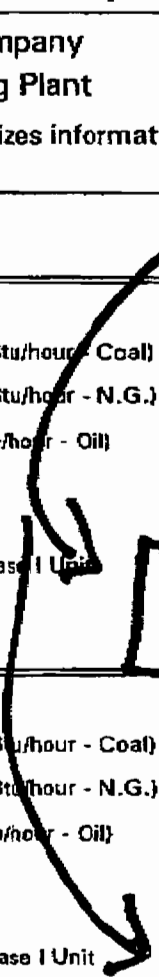
Gulf Power Company
Christ Generating Plant

Revised DRAFT Permit No.: 0330045-001-AV
Facility ID No.: 033004E

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

U. No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time	Frequency	Min. Compliance	CMS ¹	See Permit Condition(s)
					Frequency	Base Date ²	Test Duration		
-006	Boiler #6 (3,704.8 MMBtu/hour - Coal) (3,704.8 MMBtu/hour - N.G.) (714.8 MMBtu/hour - Oil)	VE	Coal	CEM	6-min.	Sept. 30	6 Minutes	No	C.18. - 20., 24., 26., 30. - 37
			Natural Gas	CEM	6-min.	Sept. 30	6 Minutes	No	
			Fuel Oil	CEM	6-min.	Sept. 30	6 Minutes	No	
	-Acid Rain Phase I Unit	PM	Coal	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No	C.17., 18., 21., 26. - 32., 36
			Natural Gas	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No	
			Fuel Oil	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No	
	-Acid Rain Phase I Unit	SO ₂	Coal	Fuel Sampling & Analysis/CEMS	24 hour avg.	Sept. 30	Annual RATA	Yes	C.15. - 18., 22. - 37.
			Natural Gas	or	or	Sept. 30	or	Yes	
			Fuel Oil	6, 5A, 6B or 6C	Annually ³	Sept. 30	1 Hour	Yes	
	-007	Boiler #7 (6,406.4 MMBtu/hour - Coal) (6,406.4 MMBtu/hour - N.G.) (1,282 MMBtu/hour - Oil)	VE	Coal	CEM	6-min.	Sept. 30	6 Minutes	No
Natural Gas				CEM	6-min.	Sept. 30	6 Minutes	No	
Fuel Oil				CEM	6-min.	Sept. 30	6 Minutes	No	
-Acid Rain Phase I Unit		PM	Coal	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No	C.17., 18., 21., 26. - 32., 36
			Natural Gas	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No	
			Fuel Oil	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No	
-Acid Rain Phase I Unit		SO ₂	Coal	Fuel Sampling & Analysis/CEMS	24 hour avg.	Sept. 30	Annual RATA	Yes	C.15. - 18., 22. - 37.
			Natural Gas	or	or	Sept. 30	or	Yes	
			Fuel Oil	6, 5A, 6B or 6C	Annually ³	Sept. 30	1 Hour	Yes	
-008		Fly Ash Silos (2)-150 tons/hr	VE	Fly Ash	EPA Method 9	Annually	Sept. 30	1 Hour	No

Consistent?



Notes:

CMS [=] continuous monitoring system used for monitoring requirement in lieu of fuel sampling and analysis if marked 'yes'.

(Acceptable as long as CMS is maintained and calibrated as required.)

Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

Test not required in years that liquid and/or solid fuel fired less than 400 hours.

TOTAL P. 02

SEP-15-1999 16:08

GULF POWER

8504446217

P.02

INTEROFFICE MEMORANDUM

Date: 15-Sep-1999 01:53pm
From: Waters, Glenn D.
GDWATERS@southernco.com
Dept:
Tel No:

To: Scott M. Sheplak (E-mail) (sheplak_s@dep.state.fl.us)

Subject: FW: Smith Statement of Basis Language

> -----Original Message-----

> From: Waters, Glenn D.
> Sent: Wednesday, September 15, 1999 8:38 AM
> To: Clair H. Fancy (E-mail); Jonathan Holtom (E-mail)
> Subject: Smith Statement of Basis Language

>
> 1. Per our conversation this morning, please find the following suggested
> language on PRIME which should following the sentence "Although Gulf Power
> contends that these limitsand still meet the permit issuance deadline
> that will enable the use of the Southern Company's requested multstate
> Acid Rain NOx averaging plan."

> The above limits may be revised upon adequate demonstration and EPA
> approval of the ISC-PRIME model for Plant Smith. Any revision of the
> limits per a ISC-PRIME demonstration will not trigger New Source Review

> 2. Under Periodic Monitoring for the combustion turbines... change any
> given federal fiscal year (Oct-Sept) to: calendar year. (This will
> allow for easy tracking). The permit will also need to be changed at B.18.

Smith changes

Solely

INTEROFFICE MEMORANDUM

Date: 15-Sep-1999 01:53pm
From: Waters, Glenn D.
GDWATERS@southernco.com
Dept:
Tel No:

To: Scott M. Sheplak (E-mail) (sheplak_s@dep.state.fl.us)

Subject: FW: Smith Permit Corrections

> -----Original Message-----

> From: Waters, Glenn D.
> Sent: Wednesday, September 15, 1999 9:33 AM
> To: Clair H. Fancy (E-mail); Jonathan Holtom (E-mail)
> Subject: Smith Permit Corrections

> Per our conversation this morning, please find the following suggested
> changes for the Smith Title V permit:

- ✓ > A.9 Add compliance date to start at April 1, 2000.
- ✓ > A.38 Delete: "and where possible, shall be performed while operating at
> conditions representative to those showing greater than 20% opacity"
- ✓ > B.18 Change federal fiscal year to Calendar year.
- > Page 31 (A.3 1. is the same as A.5) You may want to delete one of them.
- > That's it. Thanks for your patience. I'll start working on getting the
> public notice ready.

*I'll research further
A.S. was added at
EPD's request.*

INTEROFFICE MEMORANDUM

Date: 15-Sep-1999 01:53pm
From: Waters, Glenn D.
GDWATERS@southernco.com
Dept:
Tel No:

To: Scott M. Sheplak (E-mail) (sheplak_s@dep.state.fl.us)

Subject: FW: Smith Table 2-1 Changes

> -----Original Message-----

> From: Waters, Glenn D.

> Sent: Wednesday, September 15, 1999 9:59 AM

> To: Clair H. Fancy (E-mail); Jonathan Holtom (E-mail)

> Subject: Smith Table 2-1 Changes

>

> Please find fax send by GDW to Clair regarding table changes for SO2 for

> Smith Table 2-1. The suggested changes are identical to those in the

> Crist permit. Also please note that if you get a chance to revise the

> Scholz Table 2-1 , it also needs to be corrected. Call me at (850)

> 444-6527 if you have questions or if we need to talk more on the table

> revisions.

>

> See today's fax.

>

MEMO TO FILE

THRU: Clair Fancy, P.E., Chief, Bureau of Air Regulation
THRU: Scott Sheplak, P.E., Administrator, Title V Section
FROM: Jonathan Holtom, P.E., Project Engineer *J.A.*
DATE: September 14, 1999
RE: Title V Permit for the Gulf Power Smith Generating Plant

During the review and preparation of the initial Title V permit for the Gulf Power Smith Generating Plant, I discovered old construction permits for units 1 & 2. The permits were issued on February 10, 1975, to allow the construction of two new electrostatic precipitators. Attached to this memo is a brief summary of the permit history for this plant. The construction permits in question are part of the permanent file for this facility.

At the time of discovery, I felt that these permits constituted federally enforceable limits and were applicable requirements for the Title V permit. Rule 62-210.200(188)2., F.A.C., states that "For any pollutant that is specifically regulated by the EPA under the Clean Air Act, a change in the method of operation shall not include an increase in the hours of operation or in the production rate, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975."

The construction permits were issued in accordance with Florida's State Implementation Plan and were public noticed, thereby making the terms and conditions contained within the permits federally enforceable. Although increases in the production rates have been established through the operation permits, no construction permit has since been issued to alter the previously established levels of operation. My original direction from Pat Comer, OGC, was that I had no choice but to issue the Title V permit at the levels established by the construction permits issued in 1975, since those terms and conditions were established in a SIP permit and because the Title V permit is precluded by law from relaxing a SIP established limit.

Management then decided that, since these permits were issued prior to the inception of Florida's PSD program (August, 1980), and that the permits were issued for the construction of control devices and not to specifically limit the production rate, we should not consider them as an applicable requirement for the Title V permit. Therefore, the Title V permit has been processed based on the information contained in the title V permit application that was received June 14, 1996.

While I accepted management's decision and processed the Title V permit according to their direction, I still feel that under the current rules, the limits established in the construction permits constitute federally enforceable limitations, and that all subsequent increases above those levels constituted modifications. I further feel that any modifications made subsequent to August, 1980, should have been evaluated under the PSD/NSR requirements.

This memo has been submitted to the file solely for the purpose of establishing my personal opinion regarding the processing of the initial Title V permit for this facility and implies no intention of discrediting management's decision.

Gulf Power, Lansing Smith Plant

Facility ID #: 0050014

Permit History

This facility consists of two coal fired boilers (Units 1 & 2) and one combustion turbine. Units 1 & 2 were originally permitted through an operation permit in 1973. The capacities that were listed in the application and incorporated into the permit were 130 MW & 1300 MMBtu/hr for Unit 1 and 140.75 MW & 1,406 MMBtu/hr for Unit 2. The electrostatic precipitators that were included with the original design were unable to meet the PM limit. Because of this, AC permits were issued in 1975 to install two additional ESPs in order to meet the PM limit. The permits did not directly limit the capacities, but did incorporate the application data as enforceable conditions of the permit. The applications listed the capacities as 1,229 & 1,404 MMBtu/hr for Units 1 & 2, respectively. The electrical output was not mentioned in either the application or the permits.

Operation permits were issued following construction for Unit 1 in 1977 and for Unit 2 in 1978. The AO for Unit 1 limited heat input to 1,556 MMBtu/hr, the electrical output was not mentioned. The AO for Unit 2 limited heat input to 1,924 MMBtu/hr, the electrical output was not mentioned.

Renewal operating permits were issued in 1982 for Units 1 & 2, with the application for renewal listing the capacities as 1,556 and 1,974 MMBtu/hr, respectively. The electrical outputs were mentioned in the facility descriptions as 175 & 205 MW, respectively.

Renewal operating permits were issued in 1987 and 1992 for Units 1 & 2, with the application for renewal listing the capacities as 1,768 and 2,024 MMBtu/hr, respectively. The electrical outputs were mentioned in the permits as 175 & 205 MW, respectively. The permit states that the "Maximum allowable heat input is that heat input necessary to maintain electrical load output at 110% of the level at which the most recent successful particulate matter compliance test was conducted."

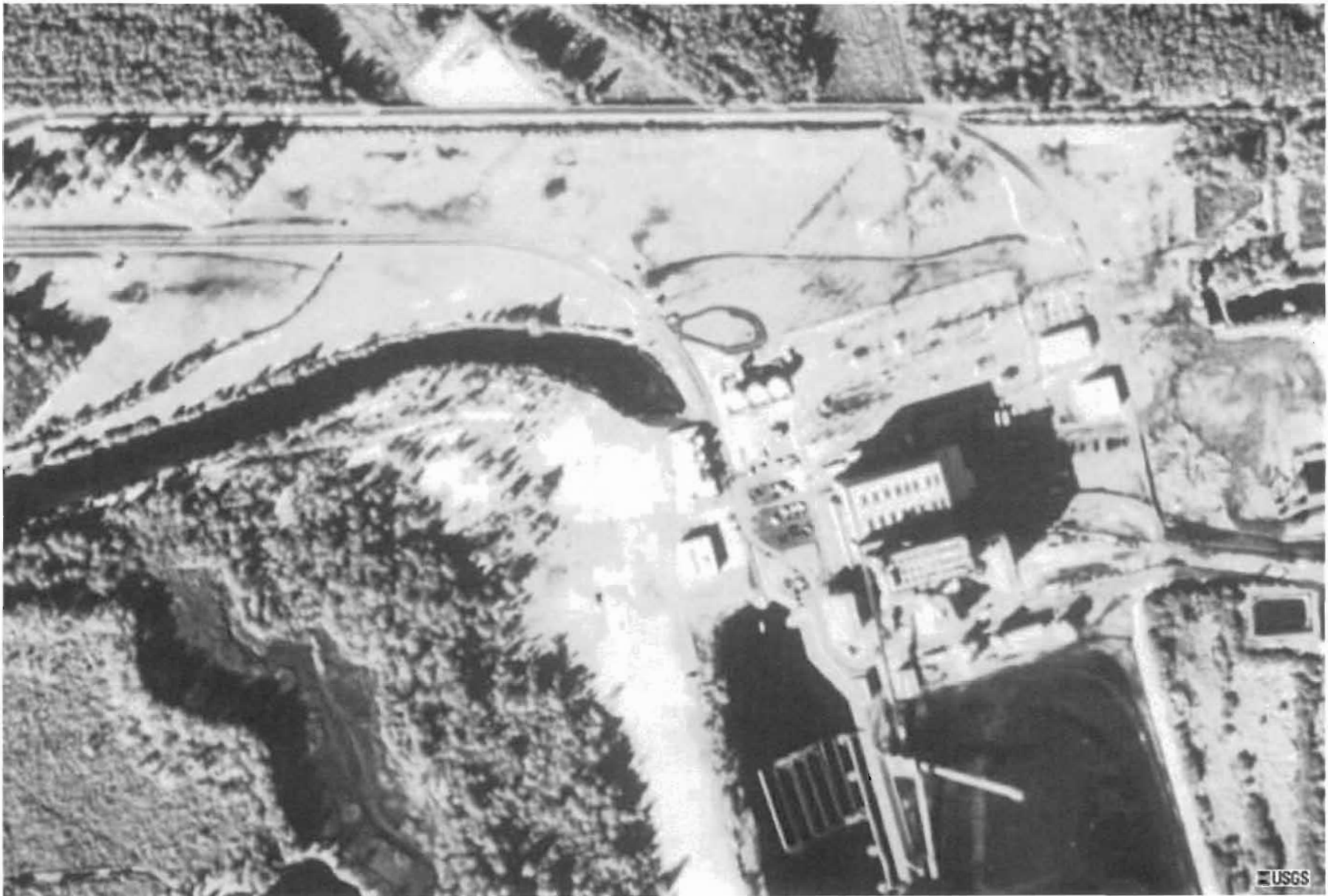
INTEROFFICE MEMORANDUM

Date: 10-Sep-1999 02:05pm
From: Waters, Glenn D.
GDWATERS@southernco.com
Dept:
Tel No:

To: Jonathan Holtom (E-mail) (holtom_j@dep.state.fl.us)

Subject: FW: QA Operating Quarter

> -----Original Message-----
> From: Beaty, Kevin L.
> Sent: Friday, September 10, 1999 10:58 AM
> To: Waters, Glenn D.
> Subject: QA Operating Quarter
>
> Dwain, here is the definition of QA operating quarter.
>
> Part 72
> Section 72.2
> QA operating quarter means a calendar quarter in which there are at least
> 168 unit operating hours(as defined in this section) or, for a common
> stack or bypass stack, a calendar quarter in which there are at least 168
> stack operating hours (as defined in this section).
>
> Kevin L. Beaty
> Gulf Power Company
> Environmental Affairs
> 850-444-6091
>



DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1. Jonathan Holton DARM
MS 5305

3. _____
4. _____
5. _____

PLEASE PREPARE REPLY FOR:

- SECRETARY'S SIGNATURE
- DIV/DIST DIR SIGNATURE
- MY SIGNATURE
- YOUR SIGNATURE
- DUE DATE _____

ACTION/DISPOSITION

- DISCUSS WITH ME
- COMMENTS/ADVISE
- REVIEW AND RETURN
- SET UP MEETING
- FOR YOUR INFORMATION
- HANDLE APPROPRIATELY
- INITIAL AND FORWARD
- SHARE WITH STAFF
- FOR YOUR FILES

COMMENTS:

*In re: Gulf Power Company
(Smith Plant)
Draft Permit # 0050014-001-AV
Extension of time to file
petition for hearing granted
until August 16, 1999.*

FROM:

M. Monahan

DATE:

8/06/99

PHONE:

1-9720

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF AIR REGULATION

AUG 06 1999

RECEIVED

GULF POWER COMPANY
(SMITH PLANT),

Petitioner,

vs.

OGC CASE NO. 97-1922

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**


This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner Gulf Power Company to grant an extension of time to file a petition for an administrative hearing on Draft Permit No. 0050014-001-AV. See Exhibit 1. Because the request shows good cause for the extension of time,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until August 16, 1999, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 22^d day of August 1999 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

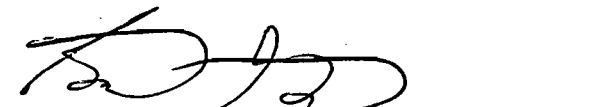


F. PERRY ODOM, General Counsel
3900 Commonwealth Boulevard, M.S. 35
Tallahassee, Florida 32399-3000

CERTIFICATE OF SERVICE

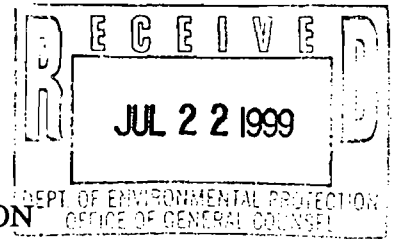
I CERTIFY that a true copy of the foregoing Order Granting Request for Extension of Time to File Petition for Hearing was mailed to Kevin B. Covington, Esquire and Angela R. Morrison, Esquire, HOPPING GREEN SAMS & SMITH, P.A., 123 South Calhoun Street, Post Office Box 6526, Tallahassee, Florida 32314, on this 5th day of August 1999.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Scott A. Goorland
Senior Assistant General Counsel

3900 Commonwealth Boulevard
Mail Station 35
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314



THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

OGC No. 97-1822

Gulf Power Company
One Energy Place
Pensacola, FL 32520

Permit No.: 0050014-001-AV
Smith Plant
Bay County

CORRECTED
REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 62-110.106(4), an extension of time, to and including August 19, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. This request is being refiled in order to correct the Permit Number reflected in the style of the request filed on July 19, 1999, a copy of which is enclosed. As good cause for granting this request, Gulf states the following:

1. On or about October 13, 1997, Gulf received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0050014-001-AV) for the Smith Plant located in Bay County, Florida. Along with the Intent to Issue, Gulf received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."

2. By order dated June 18, 1999, the Department granted an extension of time until July 19, 1999, within which to file a petition for an administrative hearing.

3. The draft permit and associated documents contain several provisions that warrant clarification or correction.

4. Representatives of Gulf have corresponded and intend to continue to correspond with staff of the Department's Bureau of Air Regulation in an effort to resolve all issues.

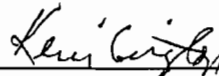
5. This request is filed simply as a protective measure to avoid waiver of Gulf's right to challenge certain conditions contained in the draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing.

6. Counsel for Gulf has attempted without success to contact Scott Goorland with the Department's Office of General Counsel regarding this request.

WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0050014-001-AV be formally extended to and including August 19, 1999. If the Department denies this request, Gulf requests the opportunity to file a Petition for Administrative Proceedings within 10 days of such denial.

Respectfully submitted this 22nd day of July, 1999.

HOPPING GREEN SAMS & SMITH, P.A.



Kevin B. Covington, Esq.

Fla. Bar No. 123171

123 South Calhoun Street

Tallahassee, FL 32301

(850) 222-7500

Attorney for GULF POWER COMPANY

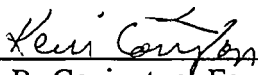
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by

U.S. Mail on this 22nd day of July, 1999:

Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Scott Goorland, Esq.
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600



Kevin B. Covington, Esq.

BEST AVAILABLE COPY

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

the Matter of an
Application for Permit by:

OGC No. 97-1822

Power Company
Energy Place
Tallahassee, FL 32320

Permit No.: PSD-FL-269
Smith Plant
Bay County

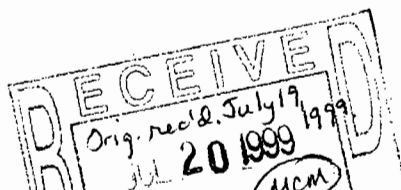
REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 62-110.106(4), an extension of time, to and from August 16, 1999, in which to file a Petition for Administrative Proceedings in the above-captioned matter. As good cause for granting this request, Gulf states the following:

On or about October 13, 1997, Gulf received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 14-001-AV) for the Smith Plant located in Bay County, Florida. Along with the Intent to Issue, Gulf received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."

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The draft permit and associated documents contain several provisions that warrant correction.



4. Representatives of Gulf have corresponded and intend to continue to correspond with staff of the Department's Bureau of Air Regulation in an effort to resolve all issues.

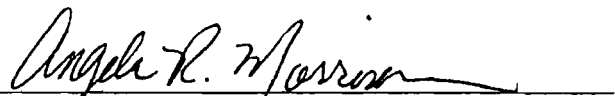
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6. Counsel for Gulf has attempted without success to contact Scott Goorland with the Department's Office of General Counsel regarding this request.

WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0050014-001-AV be formally extended to and including August 19, 1999. If the Department denies this request, Gulf requests the opportunity to file a Petition for Administrative Proceedings within 10 days of such denial.

Respectfully submitted this 19th day of July, 1999.

HOPPING GREEN SAMS & SMITH, P.A.



Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Tallahassee, FL 32301
(850) 222-7500
Attorney for GULF POWER COMPANY

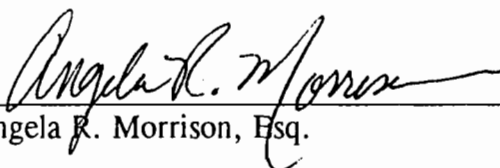
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by

U.S. Mail on this 19th day of July, 1999:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Scott Goorland, Esq.
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600



Angela R. Morrison, Esq.

Memorandum

Florida Department of Environmental Protection

TO: Buck Oven, PPSO

THRU: Clair Fancy, Chief, BAR

THRU: Al Linero, Administrator, NSR Section, BAR

FROM: Mike Halpin, Review Engineer

DATE: June 28, 1999

SUBJECT: Gulf Power Smith Unit 3
PA 99-40 and PSD-FL-269

Please include the following questions and comments in your Sufficiency package to Gulf Power.

1. Please confirm that potential NO_x emissions are highest at 95° F with duct burners, evaporative cooling and steam augmentation when compared to other temperature values (but the identical operating mode) analyzed in this application. If this is not the case, indicate the lowest permit temperature at which applicant seeks to utilize all three operational enhancements simultaneously. Also, please confirm that steam power augmentation along with duct burner firing (without evaporative cooling) is not an operating mode applicant seeks to be permitted (this was not one of the listed operating scenarios).
2. Please review and complete the chart (below) in order to clarify the Department's understanding of the selected pollutant emission rates at 100% output (2 CT/HRSG) and 95° F. Provide the same information on separate charts for 0° F, 65° F and the temperature value identified in the previous question. Emissions are shown as "ppmvd / lbs per hr" except for SO₂ which is lbs/hr only and based upon 2 grains S/ 100CF.

Operating Mode	HRS/YR	NO _x	CO	VOC	SO ₂	PM10
Standard at 95° F		9 /	13 / 116.6	3 / 14		
Standard plus Duct Burners (95°F)		10.1 /	16 / 157.4	4 / 20		
Standard plus D.B. and Evaporative Cooling (95°F)	8760	10.6 /	16 / 157.4	4 / 20		/41.8
Standard plus D.B., Evaporative Cooling and Steam Aug. (95°F)	1000	13.6 / 226.6	23 / 233.2	5.8 / 33.7	24.8	/42.9

3. Please confirm that Gulf Power is seeking a permit to allow for the simultaneous use of duct burners and evaporative cooling for up to 8760 hours per year.
4. Please describe all contemporaneous emission increases and decreases for Units 1 and 2 as well as the existing combustion turbine.
5. Please confirm that Unit 1 and 2 share a smokestack. Provide annual utilization projections of Units 1 and 2 as well as the existing combustion turbine as a result of this project, including operating hours, capacity factors, fuel usage, heat inputs per fuel type and annual emissions through year 2008.
6. Please provide NO_x emissions (tons) for calendar year 1997 from Unit 1. Additionally, provide 2 year averages for NO_x emissions as follows and indicate the source of the data:

Memorandum

Florida Department of Environmental Protection

PERIOD	NOx EMISSION RATE (AVG. TPY)		NOx EMISSION RATE (AVG. lb/10 ⁶ BTU)	
	Unit 1	Unit 2	Unit 1	Unit 2
6/97 – 5/99				
1997 – 1998				
1996 – 1997				
1995 – 1996				
1994 – 1995				
1993 – 1994				

7. Based upon Department records, Unit 1 emitted 3750.2 tons of NOx in 1996 and 3423 tons of NOx in 1998. Please describe the source(s) of the values used in the NOx netting analysis, which are approximately 20 tons higher cumulatively.
8. Please provide information relative to the proposed Unit 1 Low NOx burner installation. The Department is interested in vendor guarantees with respect to all pollutants for which PSD applies to Unit 3 (including NOx and opacity), as well as potential heat input changes, boiler surface area changes and other operating characteristics.
9. Please indicate whether Unit 1 or 2 is included in a Phase II averaging plan and what alternative contemporaneous limits exist if higher than 0.40 lb/MMBtu NOx. Additionally, indicate whether any emission reductions at this facility are being planned or contemplated, and for what purpose.
10. Please comment on how this project may impact previously modeled SO₂ violations at the site. Comment on the applicability of natural gas use on Units 1, 2 or the combustion turbine.

We will provide Park Service and EPA comments as soon as they are available. Please advise Gulf that they may contact me (Mike Halpin) at 850/921-9530 regarding the above questions.

SCC 30102122

Level 1 Industrial Processes
Level 2 Chemical Manufacturing
Level 3 Sodium Carbonate
Level 4 Soda Ash Storage: Loading and Unloading
Standard AIRS Units Tons Material Processed

Pollutant PM, total

CAS No.

Primary Control UNCONTROLLED
Secondary Control

Emission Factor: 5.200E0 Lb per Tons Material Produced

Quality E

Standard AIRS Units? No

Reference:

EPA. 1995. Section 8.12, Sodium Carbonate. In: Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Fifth Edition, AP-42. U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards. Research Triangle Park, North Carolina.

Notes:

Emission factor developed from controlled emissions with an assumed control efficiency of 99.9 percent.

Reason for Duplicate Factor:

SCC 30102122

Level 1 Industrial Processes
Level 2 Chemical Manufacturing
Level 3 Sodium Carbonate
Level 4 Soda Ash Storage: Loading and Unloading
Standard AIRS Units Tons Material Processed

Pollutant PM, total

CAS No.

Primary Control BAGHOUSE
Secondary Control VENTURI SCRUBBER

Emission Factor: 5.100E-3 Lb per Tons Material Produced

Quality E

Standard AIRS Units? No

Reference:

EPA. 1995. Section 8.12, Sodium Carbonate. In: Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Fifth Edition, AP-42. U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards. Research Triangle Park, North Carolina.

Notes:

Reason for Duplicate Factor:

SCC , 30102122

Level 1 Industrial Processes
Level 2 Chemical Manufacturing
Level 3 Sodium Carbonate
Level 4 Soda Ash Storage: Loading and Unloading
Standard AIRS Units Tons Material Processed

Pollutant PM, filterable

CAS No.

Primary Control BAGHOUSE
Secondary Control VENTURI SCRUBBER

Emission Factor: 4.100E-3 Lb per Tons Material Produced

Quality E

Standard AIRS Units? No

Reference:

EPA. 1995. Section 8.12, Sodium Carbonate. In: Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Fifth Edition, AP-42. U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards. Research Triangle Park, North Carolina.

Notes:

Reason for Duplicate Factor:



Florida
Department of
Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David Struhs
Secretary

F A X T R A N S M I T T A L S H E E T

DATE: 7/23/99

TO: Dwain Waters

PHONE: _____

FAX: 850-444-6217

FROM: Jonathan Holton

PHONE: 850-921-9531

Division of Air Resources Management

FAX: 850.922.6979

AAA-6217

RE: _____

CC: _____

Total number of pages including cover sheet: 2

Message

Please call me when you receive this fax.
The question is: Can you visually control access
to the shaded area?

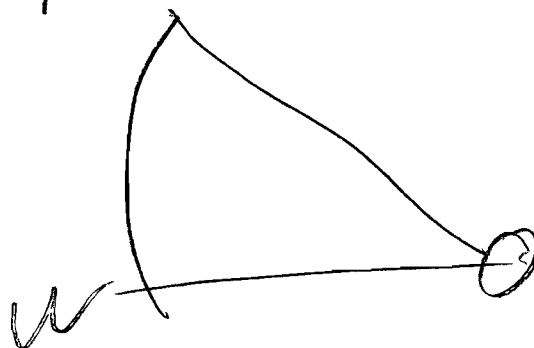
If there are any problems with this fax transmittal, please call the above phone number.

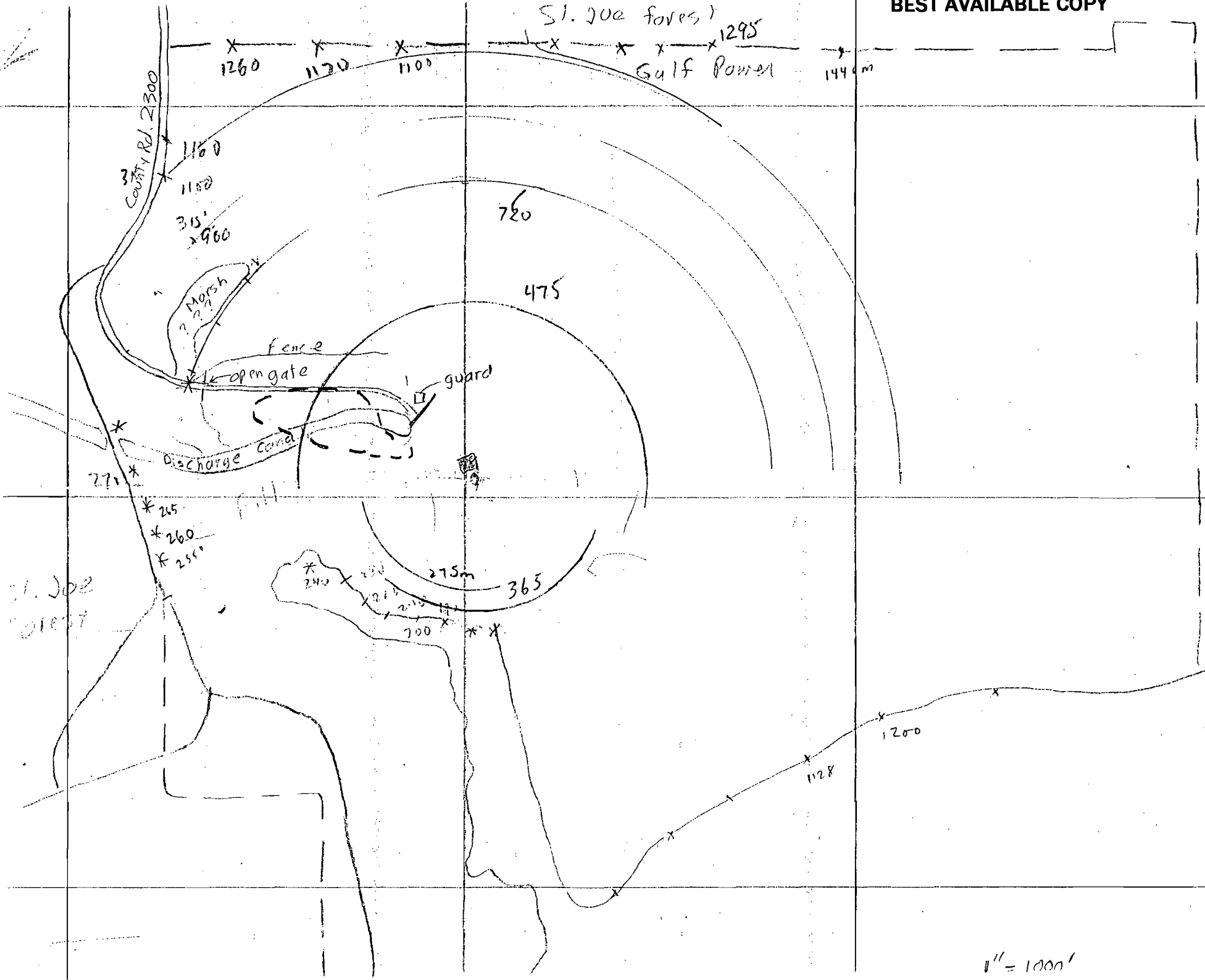
"Protect, Conserve, and Manage Florida's Environmental and Natural Resources"

Printed on recycled paper

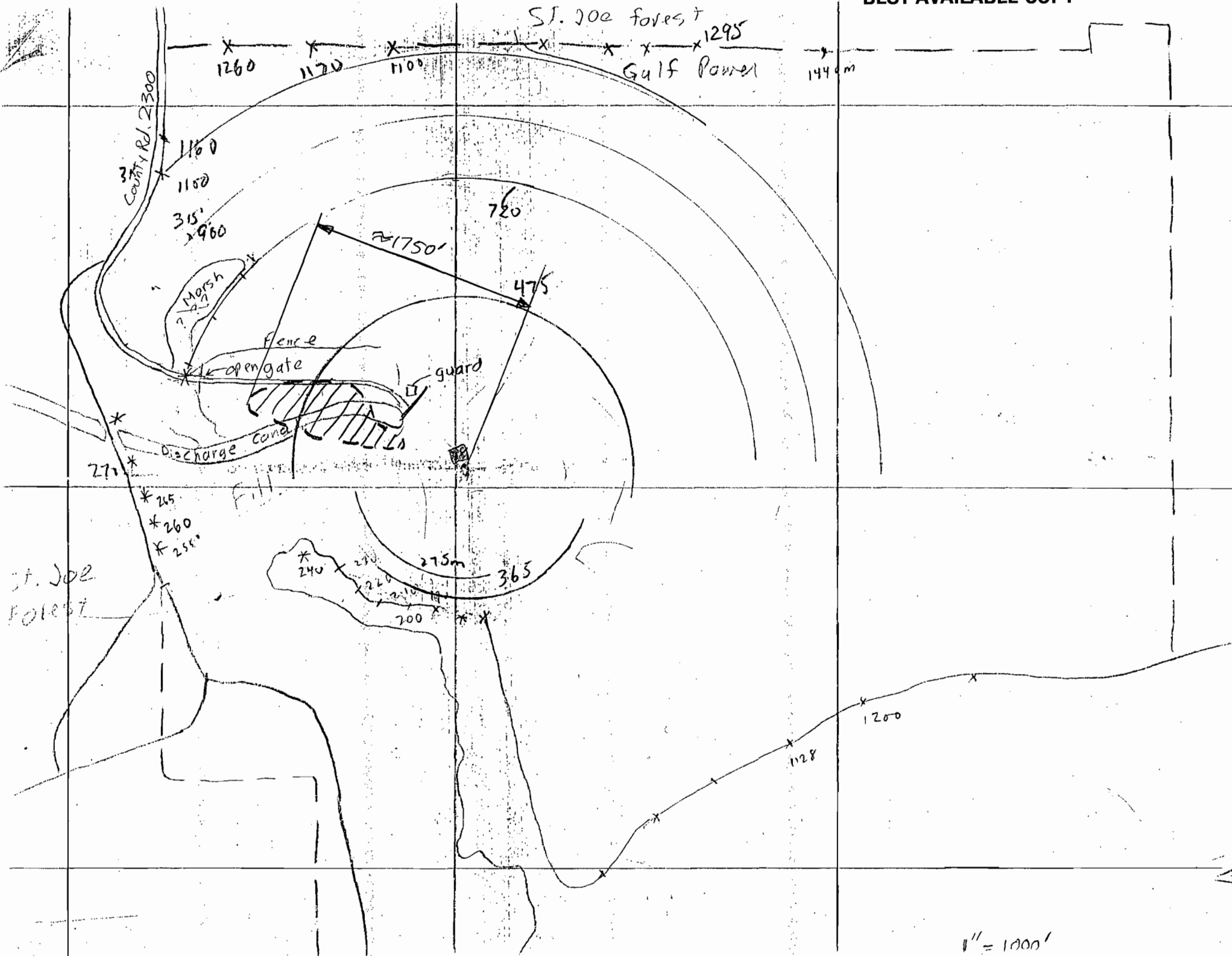
1750 FT

NW





St. Joe forest



1" = 1000'

Jonathan Holloway

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED

JUL 20 1999

In the Matter of an
Application for Permit by:

OGC No. 97-1822

Gulf Power Company
One Energy Place
Pensacola, FL 32520

Permit No.: PSD-FL-269
Smith Plant
Bay County

BUREAU OF AIR REGULATION

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 62-110.106(4), an extension of time, to and including August 16, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, Gulf states the following:

1. On or about October 13, 1997, Gulf received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0050014-001-AV) for the Smith Plant located in Bay County, Florida. Along with the Intent to Issue, Gulf received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."

2. By order dated June 18, 1999, the Department granted an extension of time until July 19, 1999, within which to file a petition for an administrative hearing.

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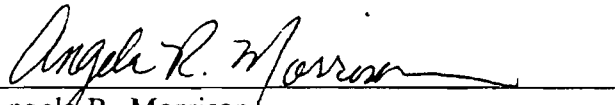
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6. Counsel for Gulf has attempted without success to contact Scott Goorland with the Department's Office of General Counsel regarding this request.

WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0050014-001-AV be formally extended to and including August 19, 1999. If the Department denies this request, Gulf requests the opportunity to file a Petition for Administrative Proceedings within 10 days of such denial.

Respectfully submitted this 19th day of July, 1999.

HOPPING GREEN SAMS & SMITH, P.A.



Angela R. Morrison

Fla. Bar No. 0855766

123 South Calhoun Street

Tallahassee, FL 32301

(850) 222-7500

Attorney for GULF POWER COMPANY

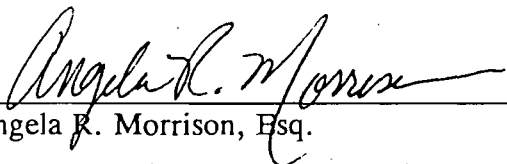
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by

U.S. Mail on this 19th day of July, 1999:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Scott Goorland, Esq.
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600



Angela R. Morrison, Esq.

One Energy Place
Pensacola, Florida 32520

850.444.6111

Jonathan
RECEIVED

JUN 22 1999

BUREAU OF
AIR REGULATION

Certified Mail



June 18, 1999

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Dear Mr. Sheplak:

RE: Plant Lansing Smith Title V Application Revision:
Permit No: 0050014-001-AV

Attached, please find several revised pages for the Lansing Smith Title V permit application previously submitted on June 13, 1996. The requested change adds a sodium carbonate injection system for Lansing Smith Unit 1 and 2 to support the fuel switch from high sulfur to low sulfur coal planned in year 2000. An analysis of the requested injection system shows no impacts to the previously submitted emissions inventory or potential emissions for this facility. New Authorized Representative and PE Certifications are enclosed for this revision. Because the estimated emissions from this process is less than 5 tons per year of a regulated pollutant, the process qualifies for a generic exemption under 62-310.300(3)(b)1. F.A.C.

Please revise the "Alternative Methods of Operation" section under EUS-11 and additional information under Emissions Unit 4 (Material Handling Activities) for the chemical additive sodium carbonate.

If you have any questions or need further information regarding the Lansing Smith Title V application, please call me at (850) 444.6527.

Sincerely,

G. Dwain Waters P.E.

G. Dwain Waters
Air Quality Programs Coordinator, QEP

Mr. Scott Sheplak

June 18, 1999

Page 2

cc: Robert G. Moore., Gulf Power Company
James O Vick, Gulf Power Company
Kimberly D. Flowers, Gulf Power Company
Danny Herrin, Southern Company Services
Ed Middleswart, FDEP Northwest District

4. Professional Engineer Statement :

I, the undersigned, hereby certify, except as particularly noted herein, that :*

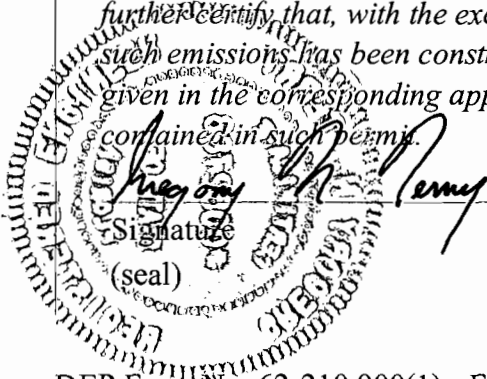
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollutant control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions 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.

If the purpose of this application is to obtain a Title V source air operation permit (check here [] 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 schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] 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.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] 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.



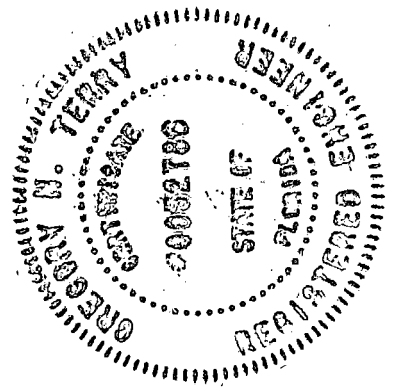
06/16/1999
Date

I. Part 6 - 1

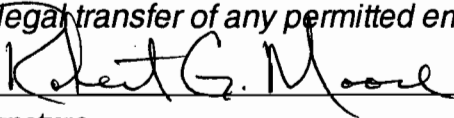
DEP Form No. 62-210.900(1) - Form

Effective : 3-21-96

11/11/20



Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official : Name : Robert G. Moore Title : V.P. Power Generation/Transmission
2. Owner or Authorized Representative or Responsible Official Mailing Address : Organization/Firm : Gulf Power Company Street Address : One Energy Place City : Pensacola State : FL Zip Code : 32520-0100
3. Owner/Authorized Representative or Responsible Official Telephone Numbers : Telephone : (850)444-6383 Fax : (850)444-6744
4. Owner/Authorized Representative or Responsible Official Statement : <i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. 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. 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 any permitted emissions units.</i>  _____ Signature 6/16/99 _____ Date

* Attach letter of authorization if not currently on file.

ALTERNATIVE METHODS OF OPERATION LANSING SMITH UNIT 1

- 1. Unit is operated under normal conditions utilizing coal as the primary fuel with supplemental firing of “on specification” used oil at a rate to minimize emissions less than the applicable opacity standard. The amount of used oil to be consumed by the unit is estimated to be less than 50,000 gallons per year.**
- 2. Unit is operated under normal conditions utilizing coal as the primary fuel with supplemental firing of “boiler chemical cleaning waste” at a rate of less than 50 gallons per minute to minimize emissions less than the applicable opacity standard.**
- 3. Unit is operated under normal conditions utilizing coal as the primary fuel with supplemental firing of “oil contaminated soil” for energy recovery at a rate to minimize emissions less than the applicable opacity standard. The amount of “oil contaminated soil” is estimated to be less than 2500 cubic yards of soil per year.**
- 4. Unit is operated under normal conditions utilizing coal as the primary fuel with supplemental firing of #2 oil.**
- 5. Unit is operated under normal conditions utilizing subbituminous coal as the primary fuel.**
- 6. Unit is operated under normal conditions utilizing bituminous coal as the primary fuel.**
- 7. Unit is operated under normal conditions utilizing subbituminous coal as the primary fuel with supplemental use of the additive “sodium carbonate” at a rate of 420 pounds per hour as necessary to minimize emissions less than the applicable opacity standard.**
- 8. Unit is operated under normal conditions utilizing bituminous coal as the primary fuel with supplemental use of the additive “sodium carbonate” at a rate of 420 pounds per hour as necessary to minimize emissions less than the applicable opacity standard.**

ALTERNATIVE METHODS OF OPERATION LANSING SMITH UNIT 2

- 1. Unit is operated under normal conditions utilizing coal as the primary fuel with supplemental firing of “on specification” used oil at a rate to minimize emissions less than the applicable opacity standard. The amount of used oil to be consumed by the unit is estimated to be less than 50,000 gallons per year.**
- 2. Unit is operated under normal conditions utilizing coal as the primary fuel with supplemental firing of “boiler chemical cleaning waste” at a rate of less than 50 gallons per minute to minimize emissions less than the applicable opacity standard.**
- 3. Unit is operated under normal conditions utilizing coal as the primary fuel with supplemental firing of “oil contaminated soil” for energy recovery at a rate to minimize emissions less than the applicable opacity standard. The amount of “oil contaminated soil” is estimated to be less than 2500 cubic yards of soil per year.**
- 4. Unit is operated under normal conditions utilizing coal as the primary fuel with supplemental firing of #2 oil.**
- 5. Unit is operated under normal conditions utilizing subbituminous coal as the primary fuel.**
- 6. Unit is operated under normal conditions utilizing bituminous coal as the primary fuel.**
- 7. Unit is operated under normal conditions utilizing subbituminous coal as the primary fuel with supplemental use of the additive “sodium carbonate” at a rate of 420 pounds per hour as necessary to minimize emissions less than the applicable opacity standard.**
- 8. Unit is operated under normal conditions utilizing bituminous coal as the primary fuel with supplemental use of the additive “sodium carbonate” at a rate of 420 pounds per hour as necessary to minimize emissions less than the applicable opacity standard.**

Sodium Carbonate Drop to Smith Coal Conveyor Belt

$$E = \frac{k \cdot (0.0018) \cdot (s/5) \cdot (u/5) \cdot (h/10)}{(m/2)^2}$$

where:

k = 1.0 for TSP; 0.37 for PM-10

s = silt content of material;

= assume 2.2 for coal ; AP-42 Table 11.2.3-1 9/88

= assume 5.0 for bottom ash; 76.6 for fly ash

= assume 1.6 for limestone; AP-42 Table 11.2.3-1 9/88

h = Height of drop in feet

m = moisture ;

= assume 7.5 % per KBN*

u = mean wind speed;

= assume 8.8 mph per KBN*

Conveyor Belt Drop Point (Plant Smith Coal Belt)

Assume h = 1 ft., s = 76.6 (the same as fly ash)

$$E_{tsp} = \frac{1.0(0.0018) \cdot (76.6/5) \cdot (8.8/5) \cdot (1/10)}{(7.5/2)^2} \text{ lb/ton of coal}$$

$$E_{tsp} = 0.000345 \text{ lb/ton of Na}_2\text{CO}_3$$

Total Drop Point Emissions = .000345 lb/ton * 1840 tons of sodium carbonate/year

$$= 0.635 \text{ lbs/year or } 0.000 \text{ tons/year}$$

Total PM-10 Drop Emissions = .635 * 0.37 = 0.235 lbs/year or 0.000 tons/year

Fill in the following variables to calculate emissions:

k	s	h	m	u	t
1	76.6	1	7.5	8.8	1,840

$$\text{TSP} = 0.000345 \text{ lb/ton of coal ash}$$

**Total Drop Point Emissions = 0.635 lbs per year
0.000 tons per year**

**Total PM-10 Drop Emissions = 0.235 lbs per year
0.000 tons per year**

Southern System NOx Averaging Plan Worksheet

Plant Name	State	ID#	Emission Limitation	ACEL	Annual Heat Input	EM * Heat Input (Cell D*Cell F)	ACEL * Heat Input (Cell E*Cell F)
Arkwright	GA	1	0.45	0.69	1875509	843979.05	1294101.21
Arkwright	GA	2	0.45	0.7	1886089	848740.05	1320262.3
Arkwright	GA	3	0.4	0.71	2006321	802528.4	1424487.91
Arkwright	GA	4	0.4	0.75	1932669	773067.6	1449501.75
Barry	AL	1	0.4	0.49	10805761	4322304.4	5294822.89
Barry	AL	2	0.4	0.49	10643159	4257263.6	5215147.91
Barry	AL	3	0.4	0.49	17148763	6859505.2	8402893.87
Barry	AL	4	0.4	0.37	25471720	10188688	9424536.4
Barry	AL	5	0.4	0.45	50897853	20359141.2	22904033.85
Bowen	GA	1	0.45	0.42	45395755	20428089.75	19066217.1
Bowen	GA	2	0.45	0.43	46911826	21110321.7	20172085.18
Bowen	GA	3	0.45	0.43	59796338	26908352.1	25712425.34
Bowen	GA	4	0.45	0.43	62106898	27948104.1	26705966.14
Branch	GA	1	0.68	0.99	14906580	10136474.4	14757514.2
Branch	GA	2	0.5	0.72	16571123	8285561.5	11931208.56
Branch	GA	3	0.68	0.84	27015768	18370722.24	22693245.12
Branch	GA	4	0.68	0.84	28967878	19698157.04	24333017.52
Crist	FL	4	0.45	0.52	3062929	1378318.05	1592723.08
Crist	FL	5	0.45	0.6	4850348	2182656.6	2910208.8
Crist	FL	6	0.5	0.45	17603755	8801877.5	7921689.75
Crist	FL	7	0.5	0.45	32267381	16133690.5	14520321.45
Daniel	MS	1	0.45	0.28	28010957	12604930.65	7843067.96
Daniel	MS	2	0.45	0.26	29025313	13061390.85	7546581.38
Gadsden	AL	1	0.45	0.65	2473380	1113021	1607697
Gadsden	AL	2	0.45	0.68	2333659	1050146.55	1586888.12
Gaston	AL	1	0.5	0.43	15666430	7833215	6736564.9
Gaston	AL	2	0.5	0.43	15642121	7821060.5	6726112.03
Gaston	AL	3	0.5	0.43	16016613	8008306.5	6887143.59
Gaston	AL	4	0.5	0.43	15780983	7890491.5	6785822.69
Gaston	AL	5	0.45	0.42	43137116	19411702.2	18117588.72
Gorgas	AL	6	0.46	0.86	5058595	2326953.7	4350391.7
Gorgas	AL	7	0.46	0.86	5052447	2324125.62	4345104.42
Gorgas	AL	8	0.4	0.49	11173785	4469514	5475154.65
Gorgas	AL	9	0.4	0.3	10939664	4375865.6	3281899.2
Gorgas	AL	10	0.4	0.76	46251622	18500648.8	35151232.72
Greene CO	AL	1	0.68	0.98	19524675	13276779	19134181.5
Greene CO	AL	2	0.46	0.43	18839670	8666248.2	8101058.1
Hammond	GA	1	0.5	0.83	4539663	2269831.5	3767920.29
Hammond	GA	2	0.5	0.83	6333156	3166578	5256519.48
Hammond	GA	3	0.5	0.83	6439818	3219909	5345048.94
Hammond	GA	4	0.5	0.45	26126591	13063295.5	11756965.95
Kraft	GA	1	0.45	0.58	2974849	1338682.05	1725412.42
Kraft	GA	2	0.45	0.58	2238703	1007416.35	1298447.74
Kraft	GA	3	0.45	0.58	3971009	1786954.05	2303185.22
L. Smith	FL	1	0.4	0.62	9199644	3679857.6	5703779.28
L. Smith	FL	2	0.4	0.44	10154723	4061889.2	4468078.12
McDonough	GA	1	0.45	0.42	18934013	8520305.85	7952285.46

No changes.

Avog. Plan still

ok.

J.H. 5/14/99

McDonough	GA	2	0.45	0.42	17338565	7802354.25	7282197.3
McIntosh	GA	1	0.5	0.86	8568975	4284487.5	7369318.5
Miller	AL	1	0.46	0.29	53814591	24754711.86	15606231.39
Miller	AL	2	0.46	0.29	52772559	24275377.14	15304042.11
Miller	AL	3	0.46	0.29	49093163	22582854.98	14237017.27
Miller	AL	4	0.46	0.29	55722252	25632235.92	16159453.08
Mitchell	GA	3	0.45	0.62	5322072	2394932.4	3299684.64
Scherer	GA	1	0.4	0.5	52573864	21029545.6	26286932
Scherer	GA	2	0.4	0.5	55563600	22225440	27781800
Scherer	GA	3	0.45	0.29	37912770	17060746.5	10994703.3
Scherer	GA	4	0.4	0.3	70093731	28037492.4	21028119.3
Scholz	FL	1	0.5	0.68	1855434	927717	1261695.12
Scholz	FL	2	0.5	0.77	1864795	932397.5	1435892.15
Wansley	GA	1	0.45	0.41	53141279	23913575.55	21787924.39
Wansley	GA	2	0.45	0.42	49741786	22383803.7	20891550.12
Watson	MS	4	0.5	0.5	17100575	8550287.5	8550287.5
Watson	MS	5	0.5	0.65	33455317	16727658.5	21745956.05
Yates	GA	1	0.45	0.48	3853527	1734087.15	1849692.96
Yates	GA	2	0.45	0.48	4687321	2109294.45	2249914.08
Yates	GA	3	0.45	0.48	3981916	1791862.2	1911319.68
Yates	GA	4	0.45	0.4	7,087,706	3189467.7	2835082.4
Yates	GA	5	0.45	0.4	5,186,897	2334103.65	2074758.8
Yates	GA	6	0.45	0.33	13,373,298	6017984.1	4413188.34
Yates	GA	7	0.45	0.3	14,601,869	6570841.05	4380560.7

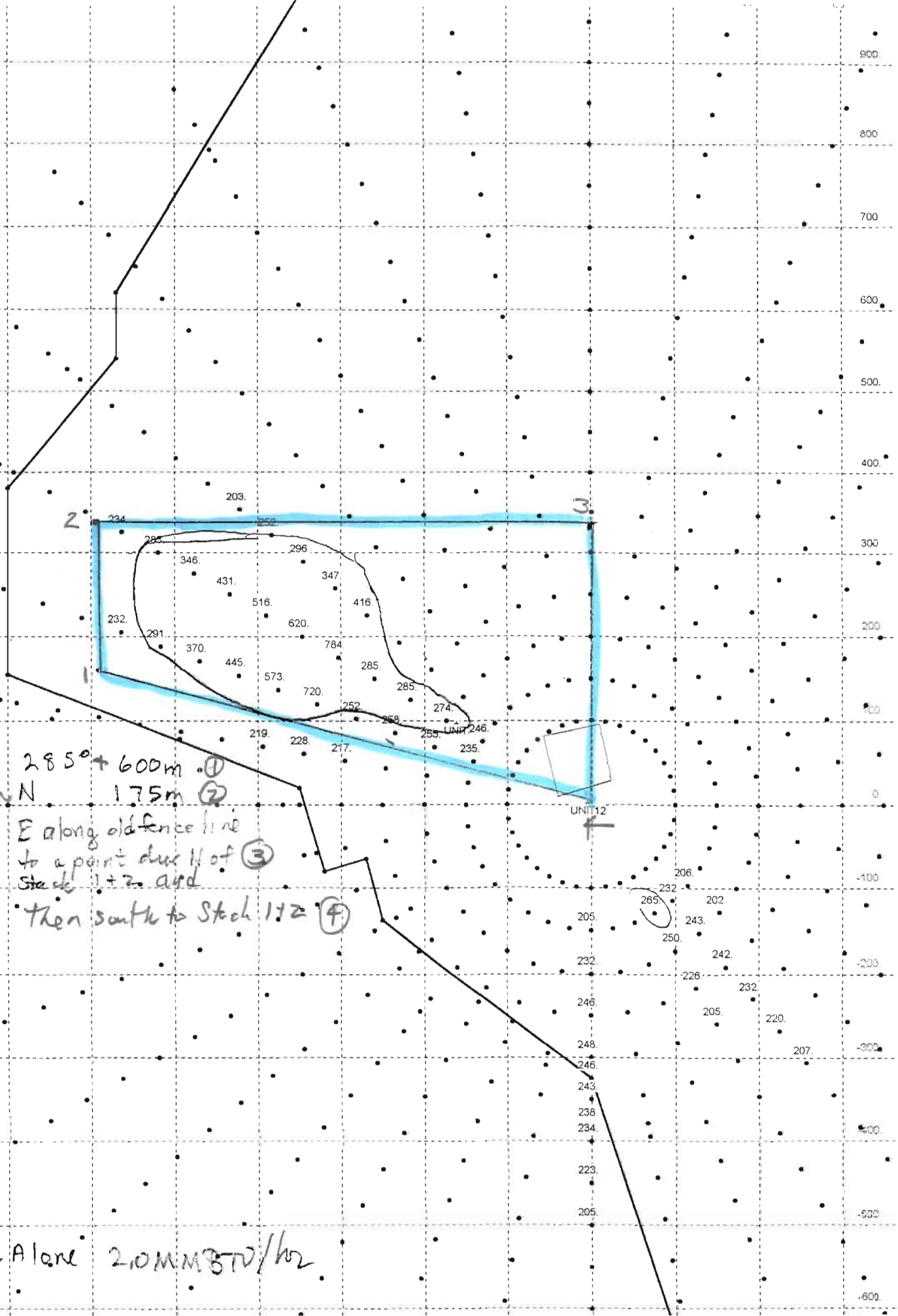
1526671484

699481605.3

697549509.9

<u>NOx lbs/mbtu</u>	<u>NOx/lbs/mbtu</u>
0.46	0.46

NOx Grand Avg with Smith 1 @ .62 lb/mbtu =	0.457 lbs/mbtu
NOx Grand Avg with Smith 1 @ .46 lb/mbtu =	0.456 lbs/mbtu
lb/mbtu difference of Smith 1 Impact on Plan =	0.001 lbs/mbtu
Smith 1 % of total weighted heat input =	0.82%



Go 285° + 600m ①
 Then N 1.75m ②
 E along old fence line
 to a point due N of ③
 Stake 1 + 2 and
 then south to Stake 1 + 2 ④

Unit 2 Alone 2.0MMBTU/hr

13. Ambient Air Quality Standards Assurance. As a result of modeling against the SO₂ Ambient Air Quality Standards established in Rule 62-204.240(1), F.A.C., a boundary restricting fence shall be installed prior to the effective date of this permit in the following locations:

Begin fencing¹ at ~~a point located approximately 290° and 840 meters from the origin^{2,3}~~ ^{the origin² and continue to 285° 600} ~~(approximate location of gate across company access road)~~ ^{to preclude public access at all times or patrolling sufficient.} ~~Follow along the east side of the access road to the Northern property boundary (approximately 320° and 1200 meters from the origin).~~ ~~Continue fencing along the Northern property boundary Eastward for a distance of 1500 meters (approximately 36° and 1230 meters from the origin).~~ ~~Turn due South and continue fencing to the ash pond (approximately 70° and 750 meters from the origin).~~ ^{Turn and align to the northeast (38°) for approxi- mately 215 m to a point which should be approximately 307° and 560 m from the origin. Then turn southeast and continue to the origin.}

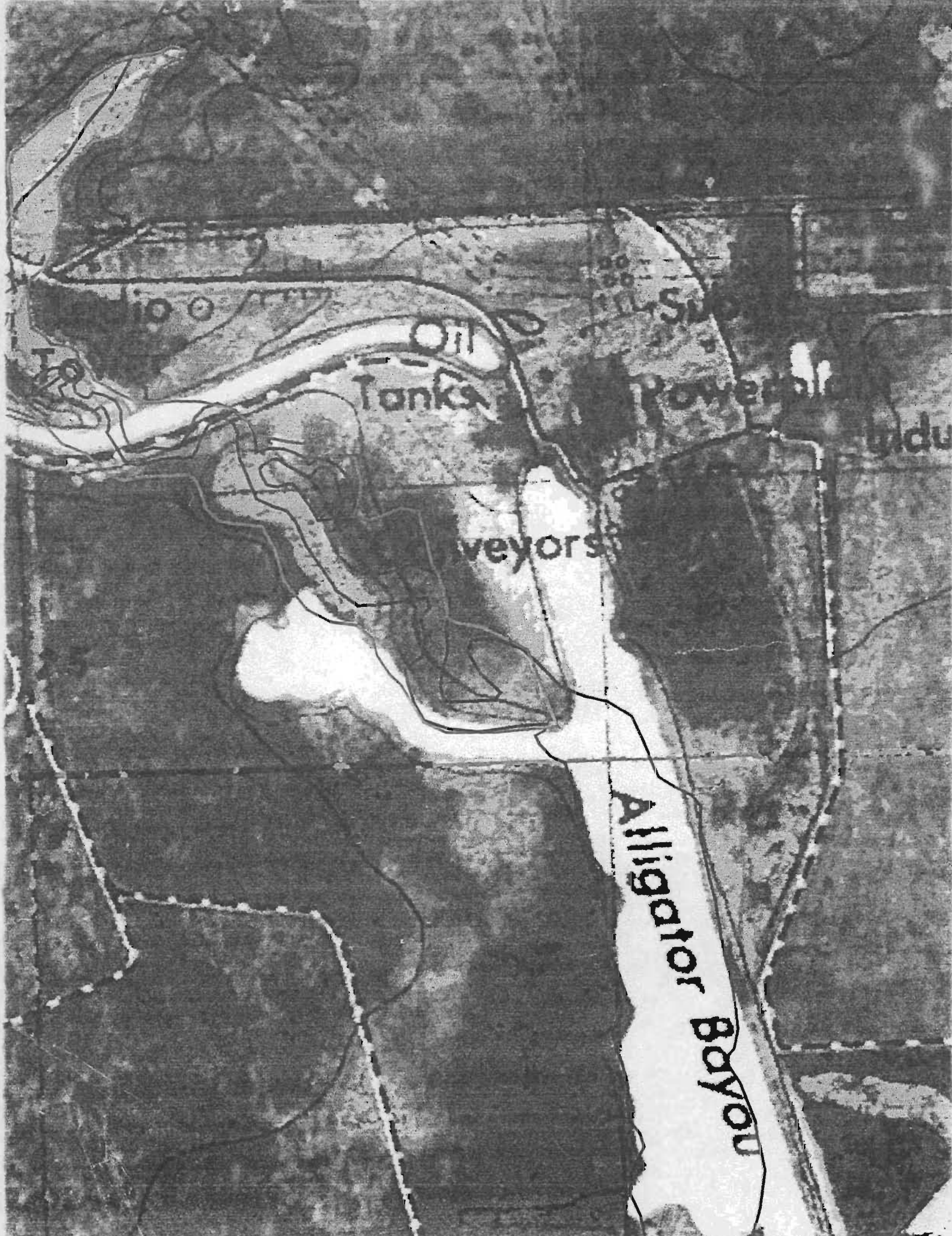
- ¹ Fencing shall be of sufficient height and strength so as to preclude public access.
- ² Point of origin: center of the common stack for Units 1 and 2.
- ³ Set due North from the center of the stack as 0°.

Clare,

Could you please provide a similar description to the one above for the two cases currently being evaluated?

- ① Units 1 & 2 combined (N.W area from stack)
- ② Units 1 & 2 alone (South of Stack).

Thanks, Jonathan

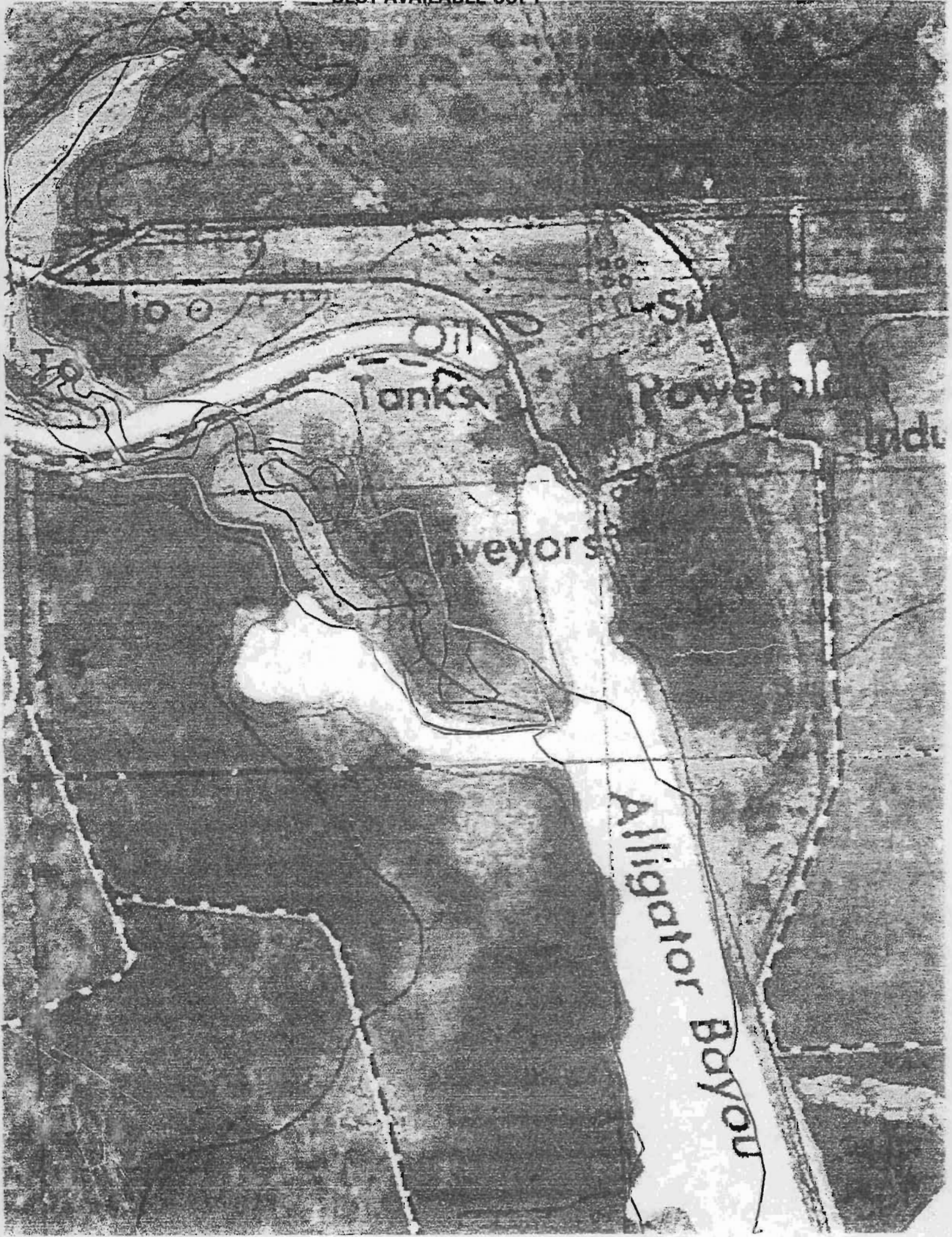


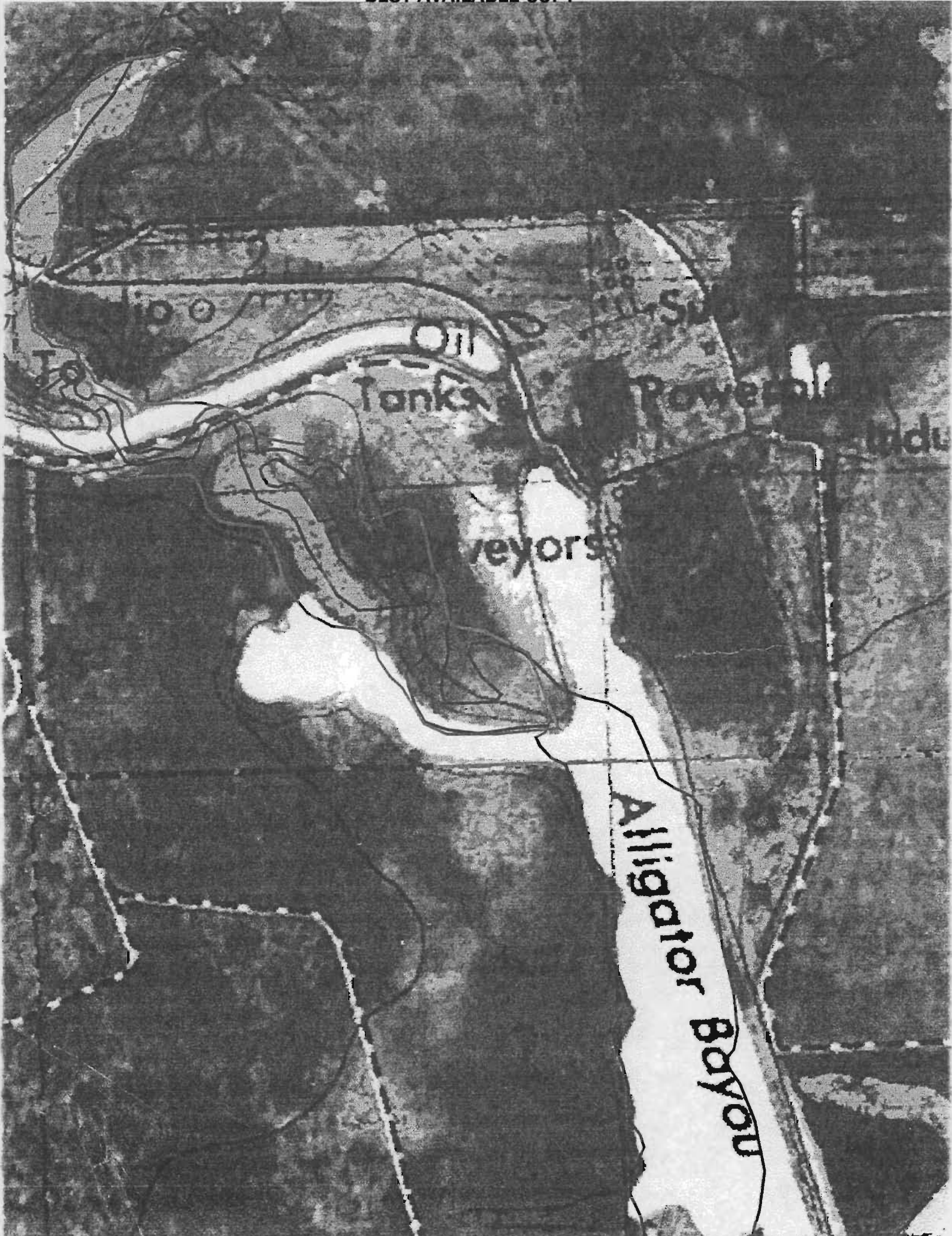
Oil
Tanks

Conveyors

Power

Alligator Bayou





To

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Oil
Tanks

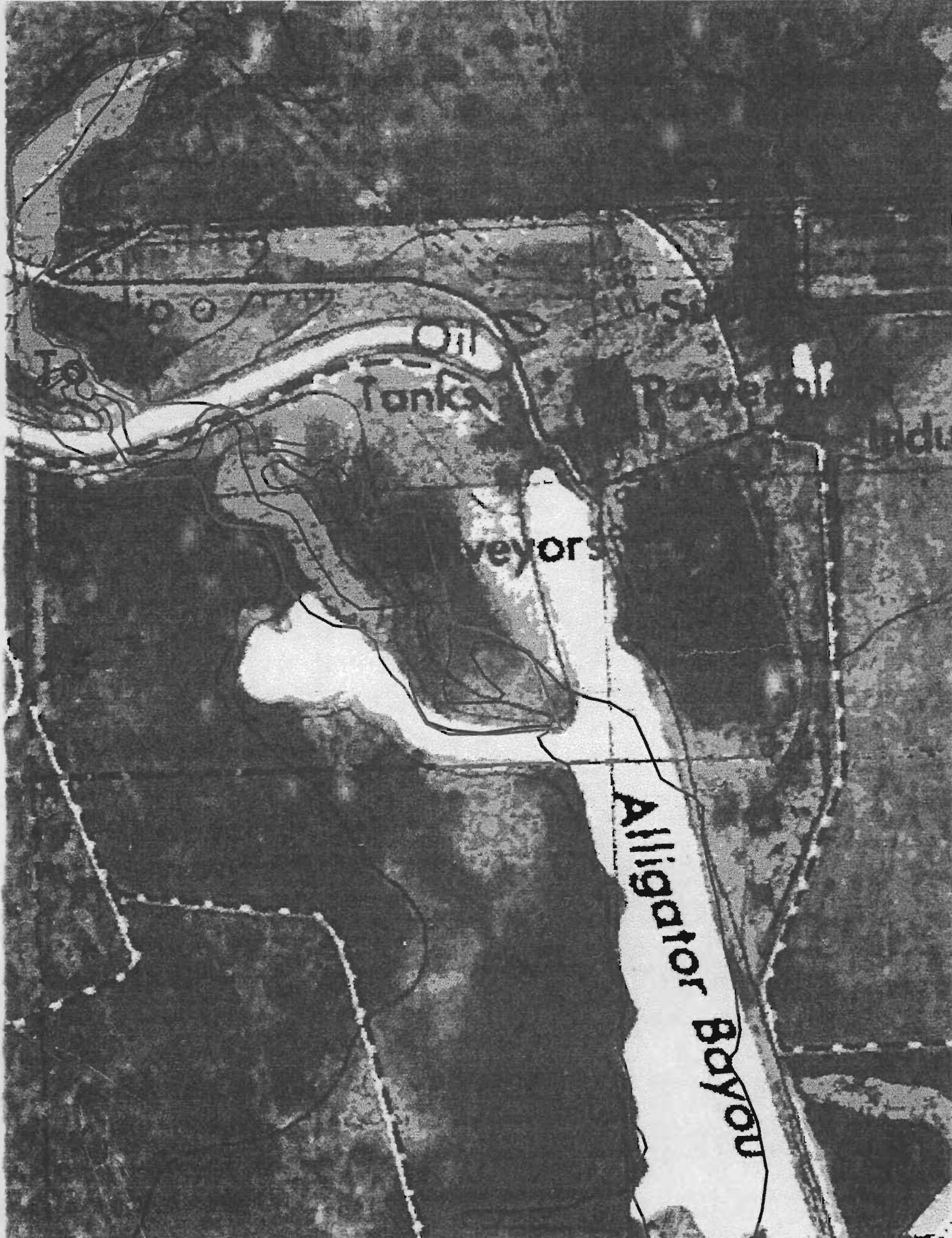
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Alligator Bayou

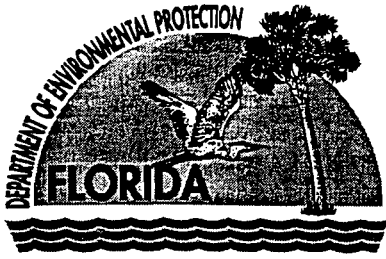


Oil
Tanks

Power

Conveyors

Alligator Bayou



Florida
Department of
Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David Struhs
Secretary

F A X T R A N S M I T T A L S H E E T

DATE: 4/9/99

TO: Dwain Waters

PHONE: _____

FAX: 850 444 6217

FROM: Jonathan Holton

PHONE: 850-921-9531

Division of Air Resources Management

FAX: **850.922.6979**

RE: Smith Map

CC: _____

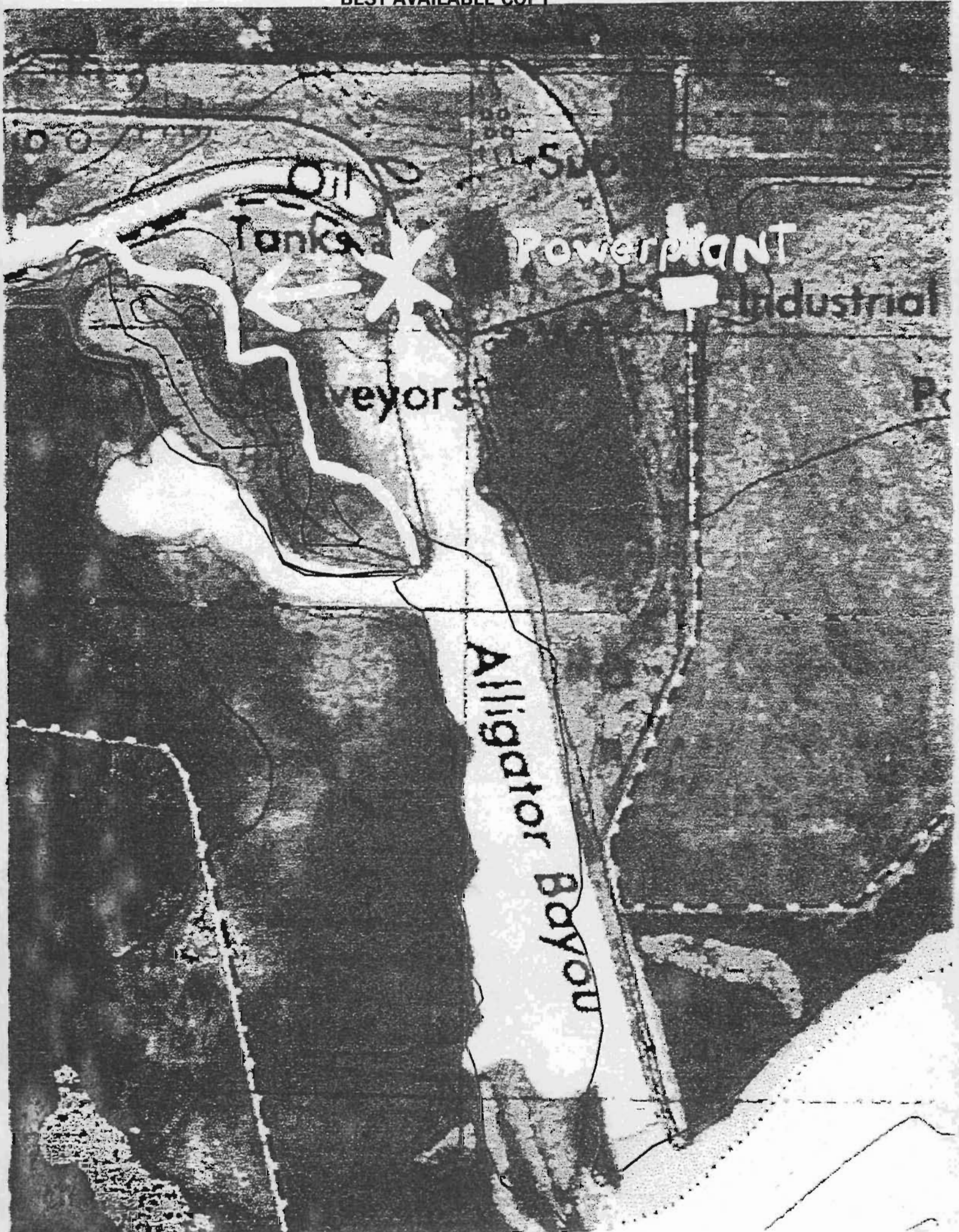
Total number of pages including cover sheet: 2

Message

If there are any problems with this fax transmittal, please call the above phone number.

"Protect, Conserve, and Manage Florida's Environmental and Natural Resources"

Printed on recycled paper



Oil
Tanks

Powerplant

Industrial

Conveyors

Alligator Bayou

414-6217

MEMO TO FILE

FROM: Jonathan Holtom J.H.
DATE: March 5, 1999
RE: Telephone Conversation with Dwain Waters

On, or about, January 28, 1999, I spoke with Dwain waters concerning the addition of a product called GAM-60 to the Title V permits for Gulf Power. The conversation was prompted by an exchange of E-mail messages between Dwain Waters and Andy Allen (NWD). During or conversation, Dwain asked about the progress of the modeling for the Smith plant. I told him that it had not been finalized, but that indications were to expect a modeled violation in the area of the slough, west of the entry gate. I explained that since this area is considered State owned waters, Gulf Power could not fence the area and preclude public access. The only alternative would be to reduce allowable emissions to the point where the modeled exceedences disappear. I further explained that if this was truly the case, the reduced emission limits would eliminate the modeled violations, thereby eliminating the need for a plant boundary fence, as was discussed in the DRAFT Title V permit issued in September(?) 1997. Dwain informed me that the fence was a done deal and that it was being installed!!!!!!

This is the second time that I have tried to explain to him that there might not be a need to spend the money on the fence (\$70,000, per Dwain). The first time was in December. He indicated at that time that they were planning to proceed with the fence.

INTEROFFICE MEMORANDUM

Date: 12-Feb-1999 03:24pm
From: Waters, Glenn D.
GDWATERS@southernco.com@PMDF@EPIC66

Dept:
Tel No:

To: Jonathan Holtom (E-mail) (holtom_j@A1@DER)
CC: Angela Morrison (E-mail) (morrisona@hgss.com@PMDF@EPIC66)
CC: Clair H. Fancy (E-mail) (fancy_c@A1@DER)
CC: Scott M. Sheplak (E-mail) (sheplak_s@A1@DER)

Subject: Title V Comments

Gulf Power would like to continue a timely productive process on our Title V permits. Our attorneys have indicated that there is no requirement for the RO to sign comments in reference to your request for Gulf Power to resubmit our Title V December 98 comments for Plant Crist. As you may recall, the original draft of the Gulf Power permits for Crist, Smith and Scholz were sent out in September, 1997. During the early comment periods, Gulf Power requested and FDEP agreed to work together with us to resolve any modeling issues. The reason for this request was to eliminate fuel contract concerns so fuel negotiations could remain flexible. Additionally, Plant Smith requested and has implemented the suggested fencing to assure compliance with your model results even though we haven't had an opportunity to review those results. To date, no data or proposed limits have been received regarding this matter for Plant Smith and Plant Scholz. Please provide Gulf Power with a timely schedule when we can expect information regarding a final permit or a response to our comments for Plant Crist and information to resolve Smith and Scholz modeling issues.

If you have any questions or would like to further discuss these issues, please call me at (850) 444 - 6527. Thanks.
Dwain

Jonathan H. Smith

RECEIVED

FEB 01 1999

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF
AIR REGULATION

In the Matter of an
Application for Permit by:

OGC No. 97-1822

Gulf Power Company
One Energy Place
Pensacola, FL 32520

DRAFT Permit No.: 0050014-001-AV
Smith Plant
Bay County

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 62-110.106(4), an extension of time, to and including June 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, Gulf states the following:

1. On or about October 13, 1997, Gulf received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0050014-001-AV) for the Smith Plant located in Bay County, Florida. Along with the Intent to Issue, Gulf received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."

2. By order dated December 3, 1998 the Department granted an extension of time until February 1, 1999, within which to file a petition for an administrative hearing.

3. The draft permit and associated documents contain several provisions that warrant clarification or correction.

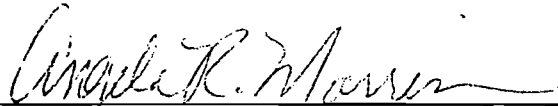
4. Representatives of Gulf have corresponded and intend to continue to correspond with staff of the Department's Bureau of Air Regulation in an effort to resolve all issues.

5. This request is filed simply as a protective measure to avoid waiver of Gulf's right to challenge certain conditions contained in the draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing.

WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0050014-001-AV be formally extended to and including June 1, 1999. If the Department denies this request, Gulf requests the opportunity to file a Petition for Administrative Proceedings within 10 days of such denial.

Respectfully submitted this 29th day of January, 1999.

HOPPING GREEN SAMS & SMITH, P.A.



Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(850) 222-7500

Attorney for GULF POWER COMPANY

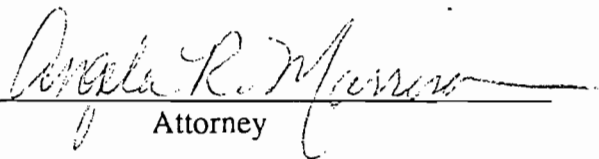
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by

U.S. Mail on this 29th day of January, 1999:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600



Attorney

Jonathan H. -
Sutt

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

OGC No. 97-1822

Gulf Power Company
One Energy Place
Pensacola, FL 32520

DRAFT Permit No.: 0050014-001-AV
Smith Plant
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2. By order dated December 3, 1998 the Department granted an extension of time until February 1, 1999, within which to file a petition for an administrative hearing.
3. The draft permit and associated documents contain several provisions that warrant clarification or correction.

4. Representatives of Gulf have corresponded and intend to continue to correspond with staff of the Department's Bureau of Air Regulation in an effort to resolve all issues.

5. This request is filed simply as a protective measure to avoid waiver of Gulf's right to challenge certain conditions contained in the draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing.

WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0050014-001-AV be formally extended to and including June 1, 1999. If the Department denies this request, Gulf requests the opportunity to file a Petition for Administrative Proceedings within 10 days of such denial.

Respectfully submitted this 29th day of January, 1999.

HOPPING GREEN SAMS & SMITH, P.A.



Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(850) 222-7500

Attorney for GULF POWER COMPANY

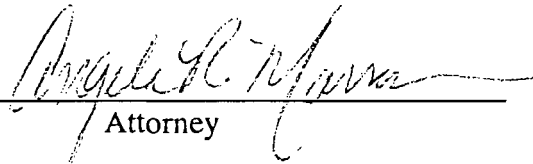
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by

U.S. Mail on this 29th day of January, 1999:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600



Attorney

Jonathan Holton
RECEIVED

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

OCT 14 1998

BUREAU OF
AIR REGULATION

GULF POWER COMPANY,
Smith Plant,

Petitioner,

vs.

OGC CASE NO. 97-1822

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

_____/

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, GULF POWER COMPANY, to grant an extension of time to file a petition for an administrative hearing on application No. 0050014-001-AV. See Exhibit 1.

Respondent, State of Florida Department of Environmental Protection, has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until December 1, 1998, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 12 day of October, 1998, in
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


F. PERRY ODOM
General Counsel

Douglas Building
3900 Commonwealth Boulevard
Mail Station #35
Tallahassee, FL. 32399-3000
Telephone: (850) 488-9314

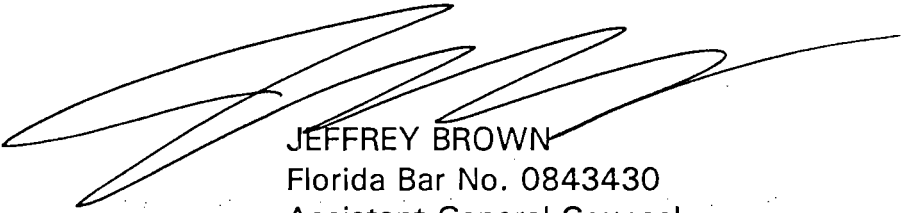
CERTIFICATE OF SERVICE

I CERTIFY that a copy of the foregoing has been mailed to:

Angela R. Morrison, Esquire
HOPPING, GREEN, SAMS & SMITH, P.A.
Post Office Box 6526
Tallahassee, FL 32314-6526

on this 13 day of October, 1998.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


JEFFREY BROWN
Florida Bar No. 0843430
Assistant General Counsel

3900 Commonwealth Boulevard
Mail Station #35
Tallahassee, FL. 32399-3000
Telephone: (850) 488-9314

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED
OCT 2 1998

State of Florida Department of Environmental Protection
Office of General Counsel

In the Matter of an
Application for Permit by:

OGC No. 97-1822

Gulf Power Company
One Energy Place
Pensacola, FL 32520

DRAFT Permit No.: 0050014-001-AV
Smith Plant
Bay County

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 62-110.106(4), an extension of time, to and including December 1, 1998, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, Gulf states the following:

1. On or about October 13, 1997, Gulf received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0050014-001-AV) for the Smith Plant located in Bay County, Florida. Along with the Intent to Issue, Gulf received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."
2. By order dated June 25, 1998, the Department granted an extension of time until October 1, 1998, within which to file a petition for an administrative hearing.
3. The draft permit and associated documents contain several provisions that warrant clarification or correction.

4. Representatives of Gulf have corresponded and intend to continue to correspond with staff of the Department's Bureau of Air Regulation in an effort to resolve all issues.

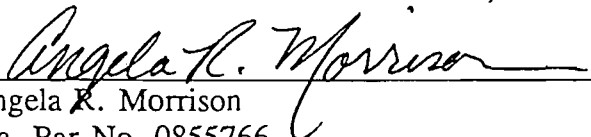
5. This request is filed simply as a protective measure to avoid waiver of Gulf's right to challenge certain conditions contained in the draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing.

6. Counsel for Gulf has attempted without success to contact Jeffrey Brown with the Office of General Counsel regarding this request.

WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0050014-001-AV be formally extended to and including December 1, 1998. If the Department denies this request, Gulf requests the opportunity to file a Petition for Administrative Proceedings within 10 days of such denial.

Respectfully submitted this 1st day of October, 1998.

HOPPING GREEN SAMS & SMITH, P.A.



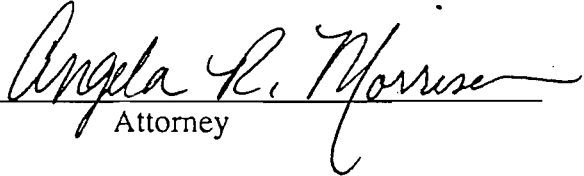
Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(850) 222-7500
Attorney for GULF POWER COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following
by U.S. Mail on this 1st day of October, 1998:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600



Attorney

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

GULF POWER COMPANY,

Petitioner,

vs.

OGC CASE NO. 97-1822

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, Gulf Power Company, to grant an extension of time to file a petition for an administrative hearing on Application No. 0050014-001-AV. See Exhibit 1.

Respondent, State of Florida Department of Environmental Protection, has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until October 1, 1998, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of Environmental Protection, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 25 day of June, 1998, in
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (904) 488-9314

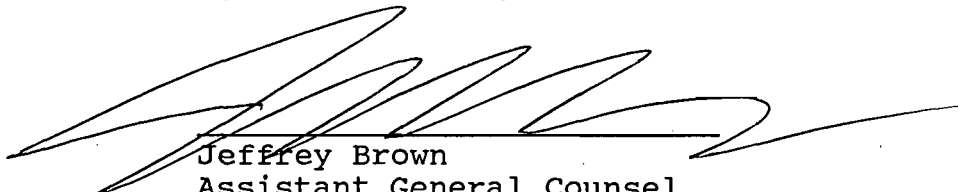
CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed
to:

Angela R. Morrison, Esq.
Post Office Box 6526
Tallahassee, Florida 32314

on this 25 day of June, 1998.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


Jeffrey Brown
Assistant General Counsel
Florida Bar No. 0843430

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (904) 488-9730

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

OGC No. 97-1822

Gulf Power Company
One Energy Place
Pensacola, FL 32520

DRAFT Permit No.: 0050014-001-AV
Smith Plant
Bay County

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 28-106.111(3) and 62-103.050(1), an extension of time, to and including October 1, 1998, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, Gulf states the following:

1. On or about October 13, 1997, Gulf received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0050014-001-AV) for the Smith Plant located in Bay County, Florida. Along with the Intent to Issue, Gulf received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."

2. By order dated January 5, 1998, the Department granted an extension of time until April 1, 1998, within which to file a petition for an administrative hearing. Gulf requested an additional extension until July 1, 1998. While an order officially granting this request has not

yet been issued, a representative from the Department orally agreed to the extension until July 1, 1998.

3. The draft permit and associated documents contain several provisions that warrant clarification or correction.

4. Representatives of Gulf have corresponded and intend to continue to correspond with staff of the Department's Bureau of Air Regulation in an effort to resolve all issues.

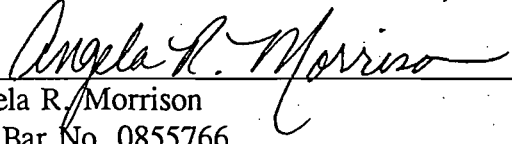
5. This request is filed simply as a protective measure to avoid waiver of Gulf's right to challenge certain conditions contained in the draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing.

6. Jonathan Holtom with the Bureau of Air Regulation has agreed to an extension until October 1, 1998, on behalf of the Department. Counsel for Gulf has attempted without success to contact Jeffrey Brown with the Office of General Counsel regarding this request.

WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to-Issue Title V Air Operation Permit for Permit No. 0050014-001-AV be formally extended to and including October 1, 1998.

Respectfully submitted this 22nd day of June, 1998.

HOPPING GREEN SAMS & SMITH, P.A.



Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(850) 222-7500

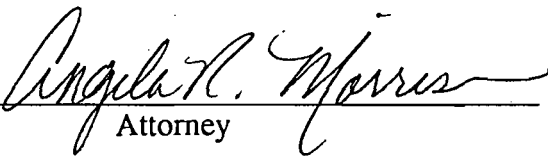
Attorney for GULF POWER COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following
by U.S. Mail on this 22nd day of June, 1998:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600



Attorney

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED

OCT 05 1998

BUREAU OF
AIR REGULATION

In the Matter of an
Application for Permit by:

OGC No. 97-1822

Gulf Power Company
One Energy Place
Pensacola, FL 32520

DRAFT Permit No.: 0050014-001-AV
Smith Plant
Bay County

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 62-110.106(4), an extension of time, to and including December 1, 1998, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, Gulf states the following:

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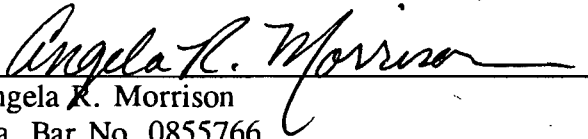
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Respectfully submitted this 1st day of October, 1998.

HOPPING GREEN SAMS & SMITH, P.A.


Angela R. Morrison
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(850) 222-7500
Attorney for GULF POWER COMPANY

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Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600



Attorney

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

OGC No. 97-1822

Gulf Power Company
One Energy Place
Pensacola, FL 32520

DRAFT Permit No. : 0050014-001
Smith Plant
Bay County

RECEIVED
JUN 22 1998

REQUEST FOR EXTENSION OF TIME

Dept. of Environmental Protection
Office of General Counsel

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 28-106.111(3) and 62-103.050(1), an extension of time, to and including October 1, 1998, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, Gulf states the following:

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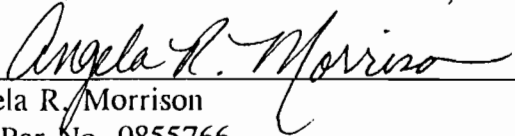
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Respectfully submitted this 22nd day of June, 1998.

HOPPING GREEN SAMS & SMITH, P.A.



Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(850) 222-7500

Attorney for GULF POWER COMPANY

CERTIFICATE OF SERVICE

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by U.S. Mail on this 22nd day of June, 1998:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600



Attorney

One Energy Place
Pensacola, Florida 32520

850.444.6111



RECEIVED

July 27, 1998

JUL 28 1998

BUREAU OF
AIR REGULATION

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Dear Mr. Sheplak:

RE: Plant Lansing Smith Title IV Phase II NOx Compliance Plan
ORIS Code: 643
FDEP Draft Permit No: 005014-001-AV

Attached, please find Gulf Power's revised Phase II NOx Compliance Plan and associated NOx Averaging Plan for the Lansing Smith Electric Generating Plant (ORIS Code 643). Please note that the new original signed copy of the averaging plan is attached to Gulf Power's Crist Title IV NOx Compliance Plan submission dated July 27, 1998. ***This revised submission changes the System NOx Averaging Plan to two decimal points instead of four as originally submitted on December 18, 1997.***

The NOx compliance plan for this unit utilizes a NOx averaging plan that includes other affected units in the Southern Company. Title V permitting authorities with jurisdiction over the units in the plan include the States of Alabama, Georgia and Mississippi, as well as the Jefferson County Department of Health in Alabama. Our sister operating companies within the Southern Company are providing their respective state environmental regulatory agencies a copy of this NOx averaging plan with their Phase II NOx permit compliance plans, thereby fulfilling the requirement of the General Instructions (Item 4a) to provide a copy of the plan to other Title V permitting authorities with jurisdiction over any units in the plan.

If you have any questions or need further information regarding the Lansing Smith Title IV Phase II Compliance and Averaging Plan, please call me at (850) 444.6527.

Sincerely,

*214-330(3)(a)2
satisfied*

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

Page 2

Mr. Scott Sheplack

July 27, 1998

cc: Robert G. Moore, Gulf Power Company
James O Vick, Gulf Power Company
L. A. Jeffers, Gulf Power Company
Stan H. Houston, Gulf Power Company
Danny Herrin, Southern Company Services
Brian L. Beals EPA Region IV

Florida Department of Environmental Protection

Phase II NO_x Compliance Plan

For more information, see instructions and refer to 40 CFR 76.9

This submission is: New Revised Page of

STEP 1 Indicate plant name, state, and ORIS code from NADB, if applicable.	Lansing Smith Electric Generating Plant Plant Name	FL State	643 ORIS Code
STEP 2	Identify each affected Group 1 and Group 2 boiler using the boiler ID# from NADB, if applicable. Indicate boiler type: "CB" for cell burner, "CY" for cyclone, "DBW" for dry bottom wall-fired, "T" for tangentially fired, "V" for vertically fired, and "WB" for wet bottom. Indicate the compliance option selected for each unit.		

ID#	ID#	ID#	ID#	ID#	ID#
1	2				
Type	Type	Type	Type	Type	Type
T	T				

(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for Phase I dry bottom wall-fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) EPA-approved early election plan under 40 CFR 76.8 through 12/31/07 (also indicate above emission limit specified in plan)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) Standard annual average emission limitation of 0.46 lb/mmBtu (for Phase II dry bottom wall-fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(f) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(g) Standard annual average emission limitation of 0.86 lb/mmBtu (for cyclone boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(h) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(i) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(j) NO _x Averaging Plan (include NO _x Averaging form)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(k) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(A) (check the standard emission limitation box above for most stringent limitation applicable to any unit utilizing stack)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

LANSING SMITH ELECTRIC GENERATING PLANT Plant Name (from Step 1)
--

STEP 2, cont'd.

ID#	ID#	ID#	ID#	ID#	ID#
Type	Type	Type	Type	Type	Type

(l) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(B) with NO_x Averaging (check the NO_x Averaging Plan box and include NO_x Averaging Form)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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(m) EPA-approved common stack apportionment method pursuant to 40 CFR 75.17 (a)(2)(i)(C), (a)(2)(iii)(B), or (b)(2)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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(n) AEL (include Phase II AEL Demonstration Period, Final AEL Petition, or AEL Renewal form as appropriate)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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(p) Repowering extension plan approved or under review

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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STEP 3

Read the standard requirements and certification, enter the name of the designated representative, sign and date.

Standard Requirements

General. This source is subject to the standard requirements in 40 CFR 72.9 (consistent with 40 CFR 76.8(e)(1)(i)). These requirements are listed in this source's Acid Rain Part of its Title V permit.

Special Provisions for Early Election Units

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO_x as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii).

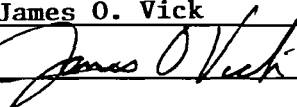
Liability. The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77.

Termination. An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7.

STEP 3, cont'd.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name James O. Vick	
Signature 	Date 7/27/98



Phase II NO_x Averaging Plan

For more information, see instructions and refer to 40 CFR 76.11

Page 1

This submission is: New Revised

Page of

STEP 1

Identify the units participating in this averaging plan by plant name, State, and boiler ID# from NADB. In column (a), fill in each unit's applicable emission limitation from 40 CFR 76.5, 76.6, or 76.7. In column (b), assign an alternative contemporaneous annual emissions limitation in lb/mmBtu to each unit. In column (c), assign an annual heat input limitation in mmBtu to each unit. Continue to page 3 if necessary.

Plant Name	State	ID#	(a) Emission Limitation	(b) Alt. Contemp. Emission Limitation	(c) Annual Heat Input Limit
See Page 3					

STEP 2

Use the formula to enter the Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan and the Btu-weighted annual average emission rate for the same units if they are operated in compliance with 40 CFR 76.5, 76.6, or 76.7. The former must be less than or equal to the latter.

Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan

Btu-weighted annual average emission rate for same units operated in compliance with 40 CFR 76.5, 76.6 or 76.7

$$\boxed{0.46} \leq \boxed{0.46}$$

$$\frac{\sum_{i=1}^n (R_{Li} \times HI_i)}{\sum_{i=1}^n HI_i}$$

$$\frac{\sum_{i=1}^n [R_{ii} \times HI_i]}{\sum_{i=1}^n HI_i}$$

Where,

- R_{Li} = Alternative contemporaneous annual emission limitation for unit i, in lb/mmBtu, as specified in column (b) of Step 1;
- R_{ii} = Applicable emission limitation for unit i, in lb/mmBtu, as specified in column (a) of Step 1;
- HI_i = Annual heat input for unit i, in mmBtu, as specified in column (c) of Step 1;
- n = Number of units in the averaging plan

Plant Name (from Step 1)

STEP 3

Mark one of the two options and enter dates.

This plan is effective for calendar year _____ through calendar year _____ unless notification to terminate the plan is given.

Treat this plan as identical plans, each effective for one calendar year for the following calendar years: 2000, 2001, 2002, 2003 and 2004 unless notification to terminate one or more of these plans is given.

STEP 4

Read the special provisions and certification, enter the name of the designated representative, and sign and date.

Special Provisions

Emission Limitations

Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitation for NO_x under the plan only if the following requirements are met:

- (i) For each unit, the unit's actual annual average emission rate for the calendar year, in lb/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and
 - (a) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,
 - (b) For each unit with an alternative contemporaneous emission limitation more stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, or
- (ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with 40 CFR 76.11(d)(1)(ii)(A) and (B), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7.
- (iii) If there is a successful group showing of compliance under 40 CFR 76.11(d)(1)(ii)(A) and (B) for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under (i).

Liability

The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.

Termination

The designated representative may submit a notification to terminate an approved averaging plan, in accordance with 40 CFR 72.40(d), no later than October 1 of the calendar year for which the plan is to be terminated.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Charles D. McCrary	
Signature <i>Charles D. McCrary</i>	Date 7/20/98

Southern Company Averaging Plan Participating Plants

Plant Name (from Step 1)

as Listed in Step 1.

NO_x Averaging - Page 3

STEP 1
Continue the
identification of
units from Step 1,
page 1, here.

Plant Name	State	ID #	(a)	(b)	(c)
			Emission Limitation	Alt. Contemp. Emission Limitation	Annual Heat Input Limit
Barry	AL	1	0.40	0.49	10,805,761
Barry	AL	2	0.40	0.49	10,643,159
Barry	AL	3	0.40	0.49	17,148,763
Barry	AL	4	0.40	0.37	25,471,720
Barry	AL	5	0.40	0.45	50,897,853
Bowen	GA	1	0.45	0.42	45,395,755
Bowen	GA	2	0.45	0.43	46,911,826
Bowen	GA	3	0.45	0.43	59,796,338
Bowen	GA	4	0.45	0.43	62,106,898
Branch	GA	1	0.68	0.99	14,906,580
Branch	GA	2	0.50	0.72	16,571,123
Branch	GA	3	0.68	0.84	27,015,768
Branch	GA	4	0.68	0.84	28,967,878
Crist	FL	4	0.45	0.52	3,062,929
Crist	FL	5	0.45	0.60	4,850,348
Crist	FL	6	0.50	0.45	17,603,755
Crist	FL	7	0.50	0.45	32,267,381
Daniel	MS	1	0.45	0.28	28,010,957
Daniel	MS	2	0.45	0.26	29,025,313
Gadsden	AL	1	0.45	0.65	2,473,380
Gadsden	AL	2	0.45	0.68	2,333,659
Gaston	AL	1	0.50	0.43	15,666,430
Gaston	AL	2	0.50	0.43	15,642,121
Gaston	AL	3	0.50	0.43	16,016,613
Gaston	AL	4	0.50	0.43	15,780,983
Gaston	AL	5	0.45	0.42	43,137,116
Gorgas	AL	6	0.46	0.86	5,058,595
Gorgas	AL	7	0.46	0.86	5,052,447
Gorgas	AL	8	0.40	0.49	11,173,785
Gorgas	AL	9	0.40	0.30	10,939,664
Gorgas	AL	10	0.40	0.76	46,251,622
Greene Co	AL	1	0.68	0.98	19,524,675
Greene Co	AL	2	0.46	0.43	18,839,670

Southern Company Averaging Plan Participating Plants

Plant Name (from Step 1)

as Listed in Step 1.

NO_x Averaging - Page 4

STEP 1
Continue the
identification of
units from Step 1,
page 1, here.

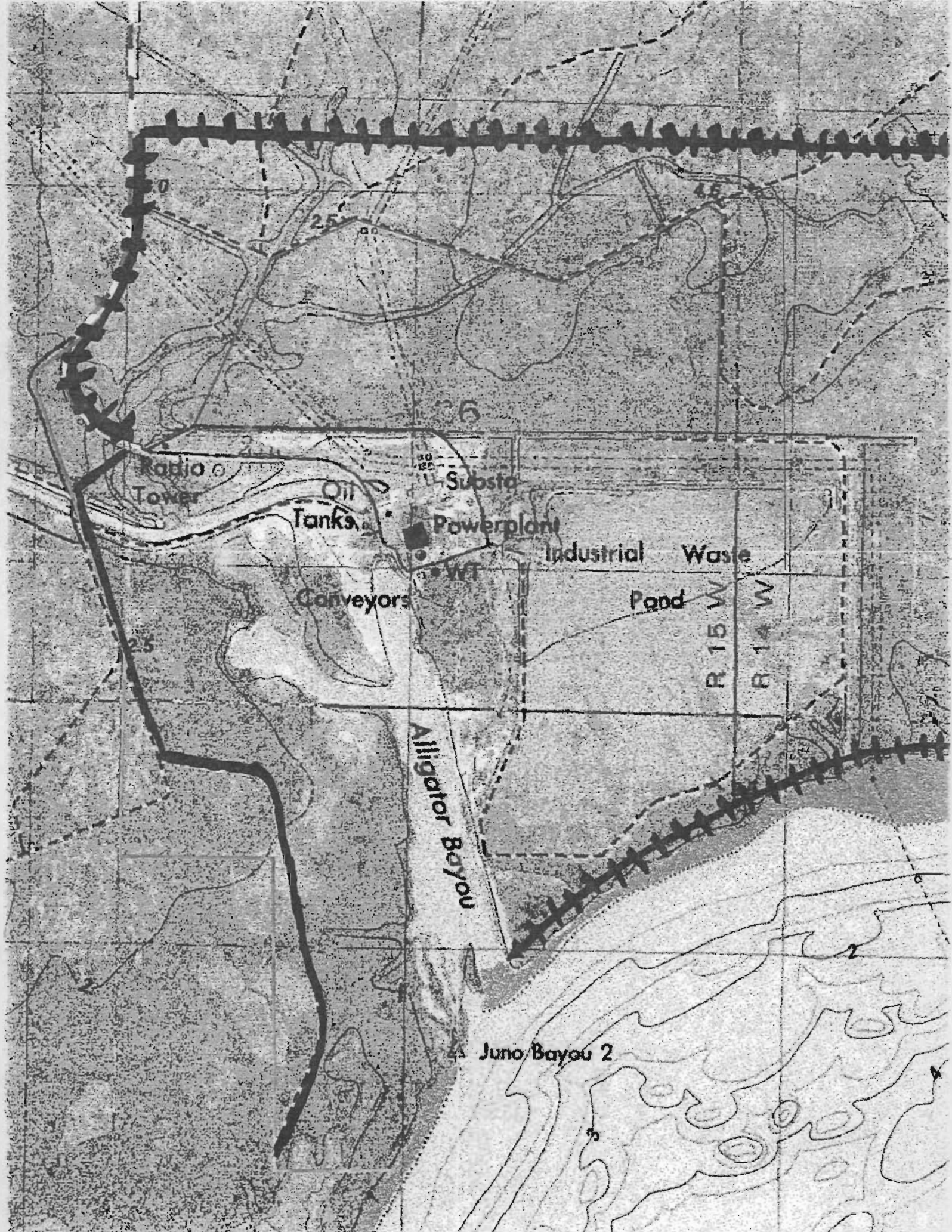
Plant Name	State	ID #	(a)	(b)	(c)
			Emission Limitation	Alt. Contemp. Emission Limitation	Annual Heat Input Limit
Hammond	GA	1	0.50	0.83	4,539,663
Hammond	GA	2	0.50	0.83	6,333,156
Hammond	GA	3	0.50	0.83	6,439,818
Hammond	GA	4	0.50	0.45	26,126,591
Kraft	GA	1	0.45	0.58	2,974,849
Kraft	GA	2	0.45	0.58	2,238,703
Kraft	GA	3	0.45	0.58	3,971,009
L. Smith	FL	1	0.40	0.62	9,199,644
L. Smith	FL	2	0.40	0.44	10,154,723
McDonough	GA	1	0.45	0.42	18,934,013
McDonough	GA	2	0.45	0.42	17,338,565
McIntosh	GA	1	0.50	0.86	8,568,975
Miller	AL	1	0.46	0.29	53,814,591
Miller	AL	2	0.46	0.29	52,772,559
Miller	AL	3	0.46	0.29	49,093,163
Miller	AL	4	0.46	0.29	55,722,252
Mitchell	GA	3	0.45	0.62	5,322,072
Scherer	GA	1	0.40	0.50	52,573,864
Scherer	GA	2	0.40	0.50	55,563,600
Scherer	GA	3	0.45	0.29	37,912,770
Scherer	GA	4	0.40	0.30	70,093,731
Scholz	FL	1	0.50	0.68	1,855,434
Scholz	FL	2	0.50	0.77	1,864,795
Wansley	GA	1	0.45	0.41	53,141,279
Wansley	GA	2	0.45	0.42	49,741,786
Watson	MS	4	0.50	0.50	17,100,575
Watson	MS	5	0.50	0.65	33,455,317
Yates	GA	1	0.45	0.48	3,853,527
Yates	GA	2	0.45	0.48	4,687,321
Yates	GA	3	0.45	0.48	3,981,916
Yates	GA	4	0.45	0.40	7,087,706
Yates	GA	5	0.45	0.40	5,186,897
Yates	GA	6	0.45	0.33	13,373,298
Yates	GA	7	0.45	0.30	14,601,869

Date: 7/13/98 10:57:10 AM
From: Scott Woolam TAL
Subject: Alligator Bayou
To: Jonathan Holtom TAL
CC: Rod Maddox TAL
CC: Richard Malloy TAL
CC: Melanie Knapp TAL 486-8123

Clay Hall 8-2427
Bureau of Survey & Mapping

UPDATE:

WE ARE DIGITIZING HISTORIC MHW LINE FROM AERIALS...WE WILL TAKE THIS INFO WITH US TO THE FIELD. WE HAVE TO BE IN THIS AREA IN 2 WEEKS AND WE HAD HOPE TO LOOK AT IT THEN..PLEASE ROUTE US A QUAD MAP ON HOW TO GET TO THE NORTHERN MOST SPOT THAT WE HAD REVIEWED....CONTACT US IF ANY OTHER QUESTIONS...THANKS



Radio Tower

Oil Tanks

Substa

Powerplant

Industrial Waste Pond

Conveyors

WT

R 15 W

R 14 W

Alligator Bayou

Juno Bayou 2

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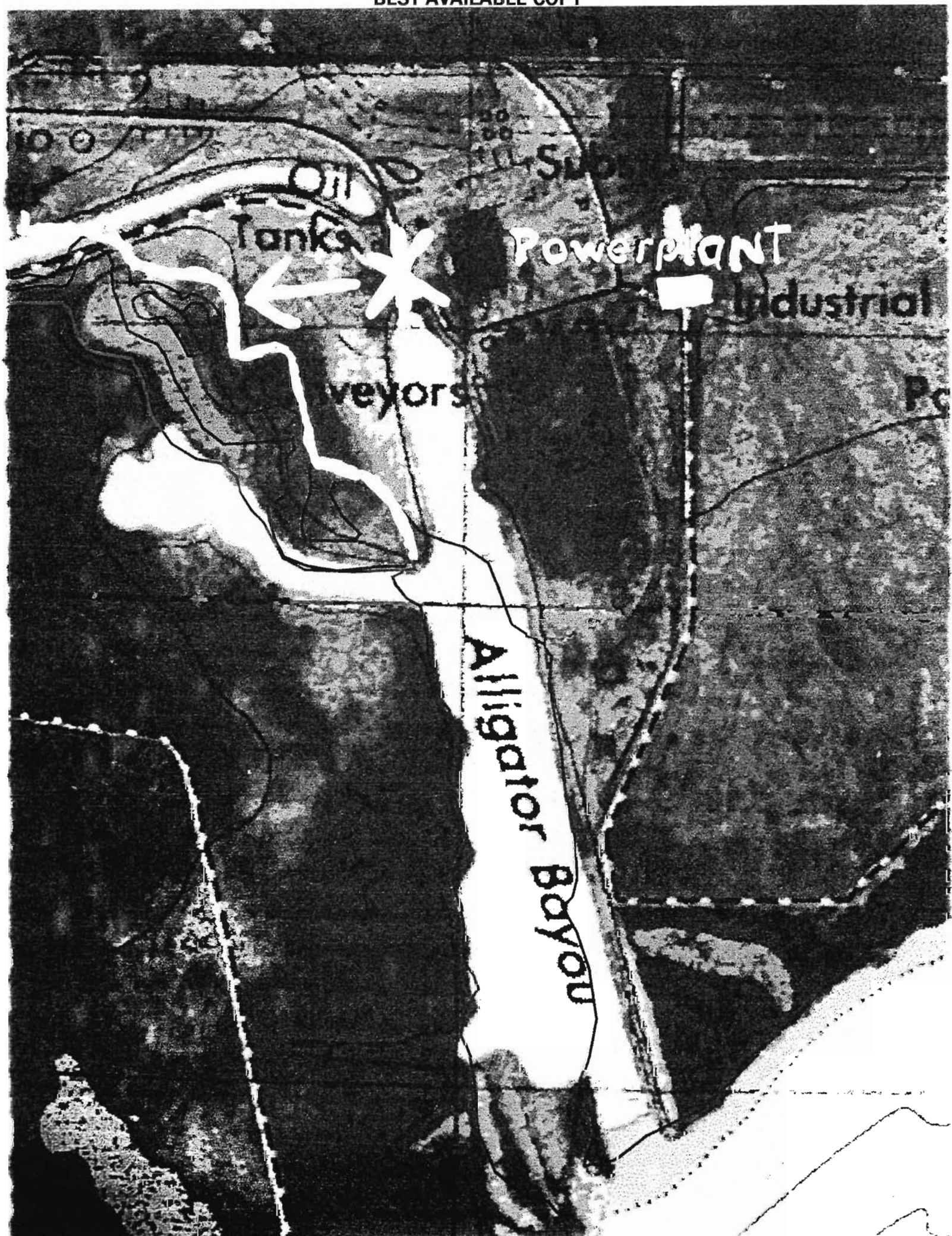
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Oil
Tanks

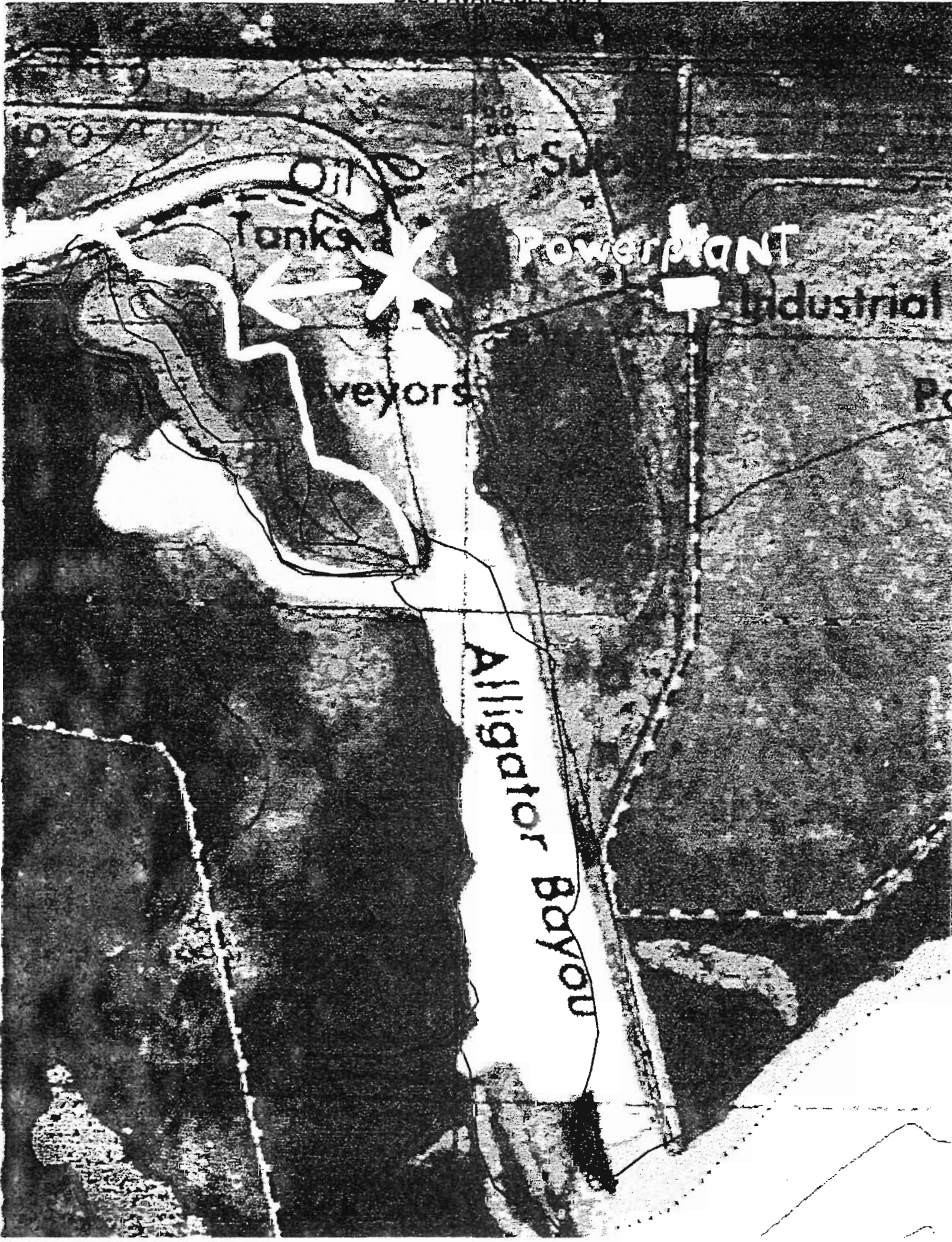
Powerplant

Industrial

Conveyors

Alligator Bayou





Oil
Tanks

Powerplant

Industrial

Conveyors

Alligator Bayou

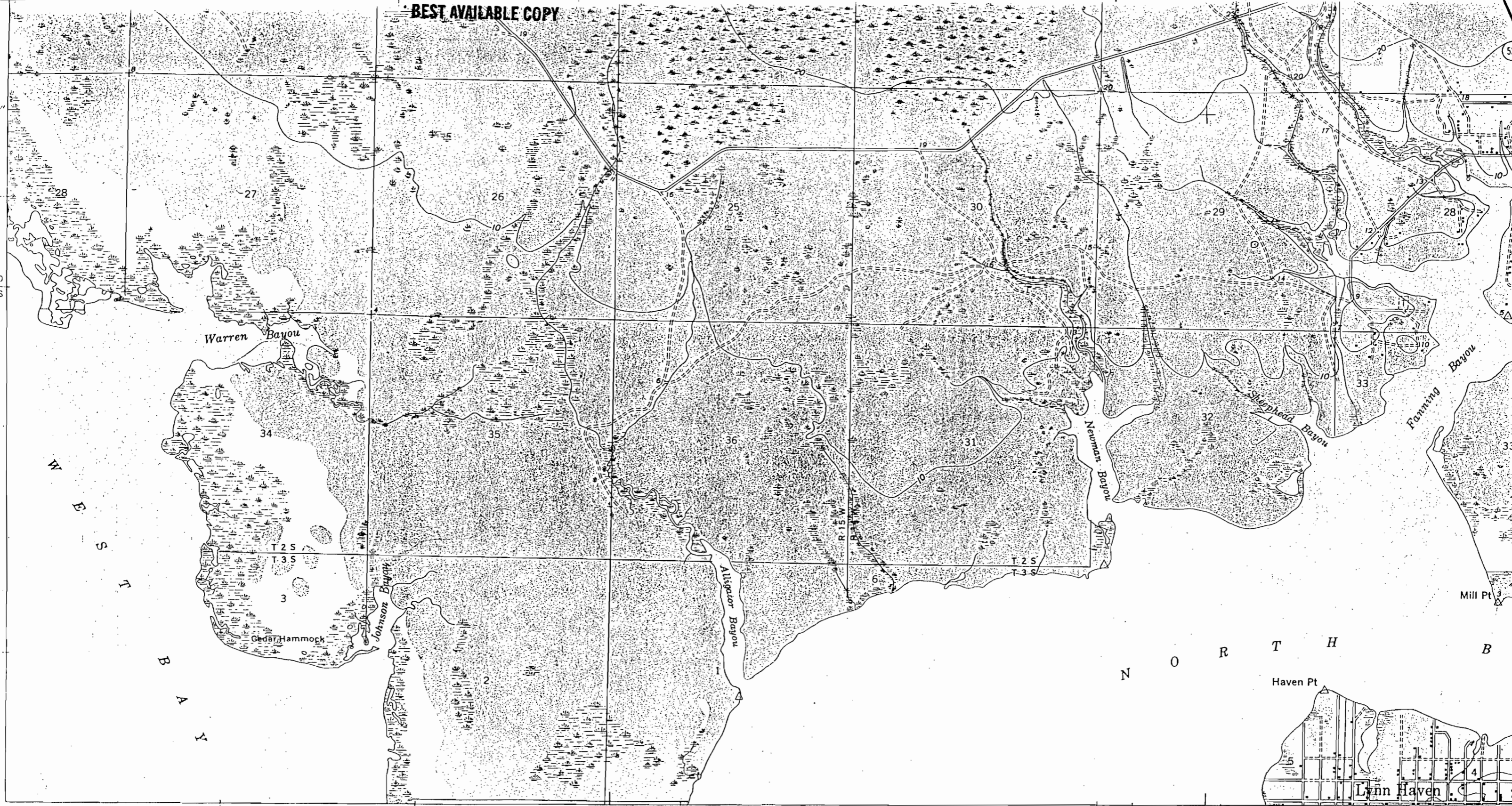


SCOTT E. WOOLAM
PROFESSIONAL LAND SURVEYOR MANAGER
BUREAU OF SURVEY AND MAPPING
DIVISION OF STATE LANDS

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
3900 COMMONWEALTH BOULEVARD
MAIL STATION #105
TALLAHASSEE, FLORIDA 32399-3000

TELEPHONE:
(904) 488-2427
SUNCOM: 278-2427
FAX: (904) 922-4250

BEST AVAILABLE COPY



Topography by F. H. Sargent, B. O. Fridge,
and R. J. Bavy
Surveyed in 1943

SOUTHPORT
1944 ed.

1345 000 YARDS 42'30"

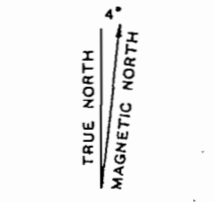
(Panama City)

40'

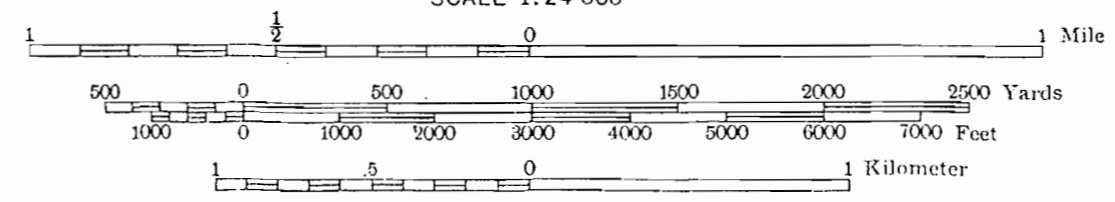
PANAMA CITY (JUNC. U. S. 98) & WEAHITCHKA 3

MR 1908

INTERIOR—GEOLOGICAL SURVEY, WASHINGTON, D. C.—1960



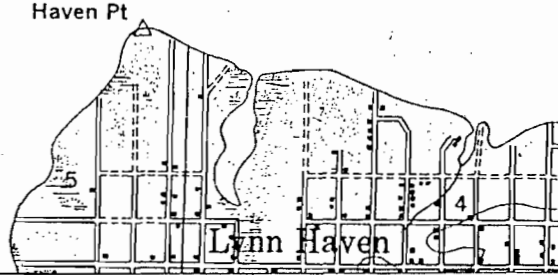
APPROXIMATE MEAN DECLINATION, 1943

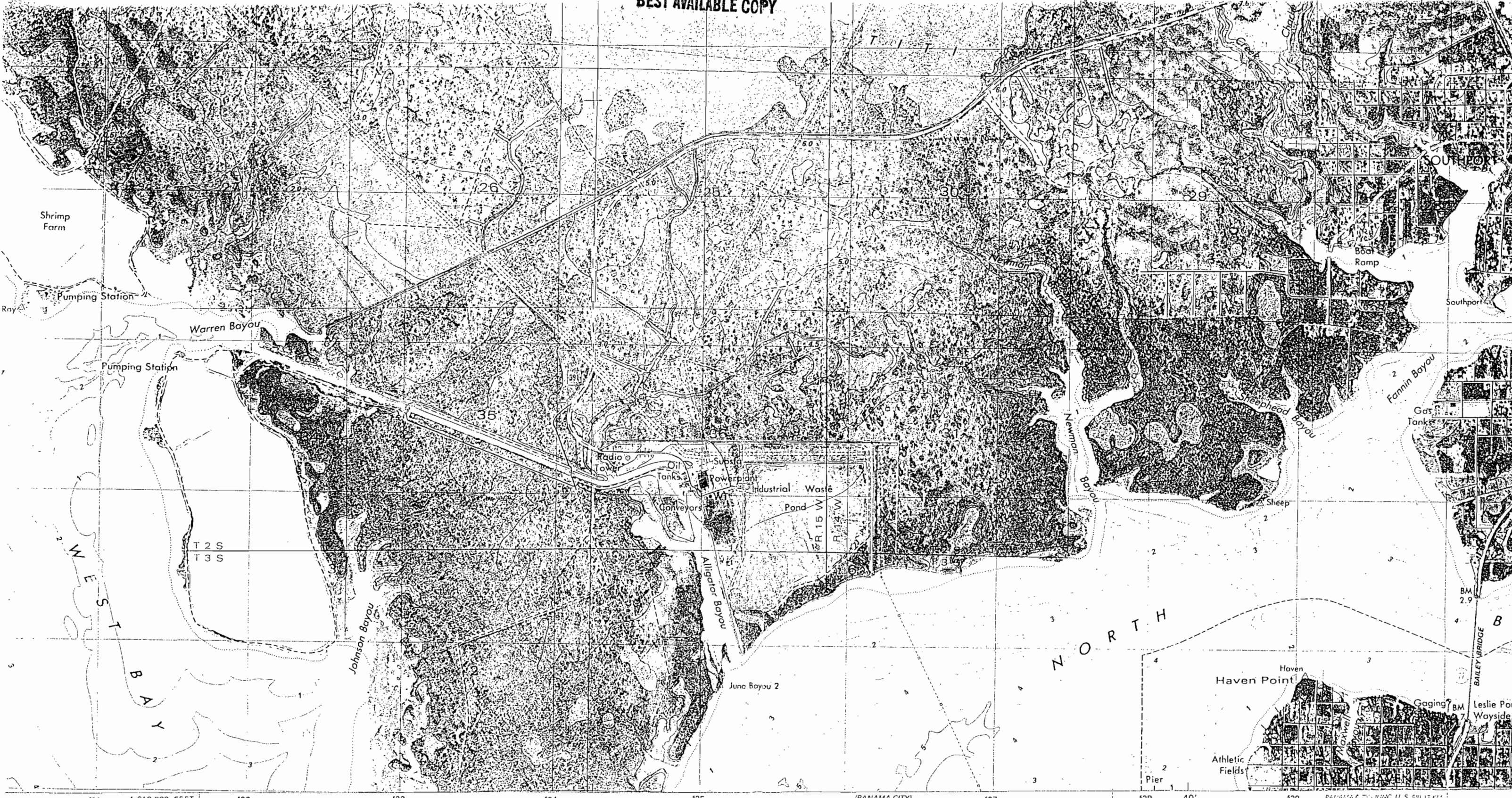


Contour interval 10 feet
Datum is mean sea level

ROAD CLASSIFICATION 1943		
Dependable hard surface	Loose surface, graded	U. S. Road
heavy-duty road	Unsurfaced, graded	
Secondary hard surface	dry weather roads	
all weather road	Dirt road	Slate Road

More than two lanes indicated along road with tick at point of change



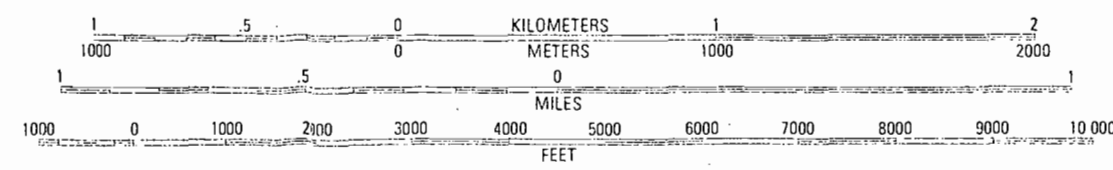


Produced by the United States Geological Survey
National Ocean Survey
Control by USGS and NOS/NOAA
Photomaps prepared from aerial photograph taken
January 18, 1976. Compiled by photogrammetric methods
from aerial photographs taken January 1975 and planetable
photographs 1978. Field checked 1977. Map edited 1982
Replaces topographic map dated 1943
Symmetry compiled by the National Ocean Survey from
coordinated hydrographic surveys
Information is not intended for navigational purposes
Low water (dotted) line and mean high water (solid) line
Compiled by NOS from tide-coordinated aerial photographs
Tentative shoreline (outer edge of vegetation) shown
by photomaps

UTM GRID AND 1982 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET



QUADRANGLE LOCATION



SCALE 1:24 000
CONTOUR INTERVAL 2 METERS
SUPPLEMENTARY CONTOUR INTERVAL 1 METER
DASHED SUPPLEMENTARY CONTOURS ARE APPROXIMATE
NATIONAL GEODETIC VERTICAL DATUM OF 1929
CONTROL ELEVATIONS SHOWN TO THE NEAREST 0.1 METER
OTHER ELEVATIONS SHOWN TO THE NEAREST 0.5 METER

NATIONAL OCEAN SURVEY
HYDROGRAPHIC SURVEY INDEX
SOUTHPORT
1982

Primary high
hard surface
Secondary
hard surface
Inte

Melanie
Kuypp 8-8/23

May 11, 1998

RECEIVED

MAY 26 1998

BUREAU OF
AIR REGULATION

To: Clair H. Fancy, Chief
Bureau of Air Regulation

From: Terry Wilkinson, Chief *SW for TEW*
Bureau of Survey and Mapping

Re: State Interest in Alligator Bayou, Located in Section 1,
Township 3 South Range 15 West, and Sections 35 and 36,
Township 2 South, Range 15 West, Bay County

This is in response to your request for a determination of state interest in Alligator Bayou, located in Section 1, Township 3 South, Range 15 West, and Sections 35 and 36, Township 2 South, Range 15 West, Bay County. Our records indicate that the bayou existed at the time of the original U.S. Government Land Office survey by Benjamin and J.B. Clements in 1833. Based on these survey records, it appears that the portion of the bayou lying below the mean high water line (MHWL), and waterward of the west line of Section 36, Township 2 South, Range 15 West, prior to the alteration of the original shoreline belongs to the Board of Trustees of the Internal Improvement Trust Fund by virtue of sovereignty.

Portions of this area were altered at the time of the construction of a power generating facility in the early 1960's. Any submerged lands which were dredged from uplands would not be claimed by the state, and any filled formerly sovereign submerged lands might not be state owned pursuant to Section 253.12, subsections (9) and (10), Florida Statutes. All of the remaining sovereign submerged lands are still state owned. A portion of the state owned submerged land located at the mouth of the bayou is subject to Board of Trustees' Easement No. 29350(4505), which was issued to Gulf Power Company on March 2, 1995. A copy of this easement is enclosed for your information.

Our records currently have insufficient information and documentation to determine whether those tributaries of the bayou located upstream from the intersection of the bayou with the west line of Section 36 are state-owned. Therefore, enforcement of proprietary interest in this area is not recommended at this time. However, environmental resource permitting requirements may still apply. If, based on additional information, these tributaries are determined to be state-owned, proprietary requirements of the Board of Trustees would apply. We will notify your office if that is the case.

If you have concerns as to the exact location of those portions of the subject area which are sovereign, this determination can only be provided through a survey of the subject area. You may wish to contact Mr. Scott Woolam, Professional Land Surveyor Manager, Bureau of Survey and Mapping at 488-2427 for further information.

TEW/mjk

cc: Scott Woolam

This Instrument Prepared By:
Ruby D. Clary
Submerged Lands Section
Bureau of Land Management Services
3900 Commonwealth Boulevard
Mail Station No. 125
Tallahassee, Florida 32399

** OFFICIAL RECORDS **
BOOK: 1574 PAGE: 810
FILE# 95-028314
BAY COUNTY, FLORIDA

BOARD OF TRUSTEES OF THE INTERNAL IMPROVEMENT TRUST FUND
OF THE STATE OF FLORIDA

SOVEREIGN SUBMERGED LANDS EASEMENT

Easement No. 29350
BOT FILE NO. 032610821

(4505-03)

THIS EASEMENT is hereby granted by the Board of Trustees of the Internal Improvement Trust Fund of the State of Florida, hereinafter referred to as the Grantor.

WITNESSETH: That for the faithful and timely performance of and compliance with the terms and conditions stated herein, the Grantor does hereby grant to Gulf Power Company, a Maine corporation, hereinafter referred to as the Grantee, a nonexclusive easement on, under and across the sovereign lands described as follows:

A parcel of sovereign submerged land in Section 01, Township 03 South, Range 15 West, within Alligator Bayou, Bay County, as is more particularly described and shown on Attachment A, dated January 27, 1995.

TO HAVE THE USE OF the hereinabove described premises for a period of 30 years from March 2, 1995, the effective date of this easement. The terms and conditions of and for which this easement is granted are as follows:

1. The above described parcel of land shall be used solely for an access channel and Grantee shall not engage in any activity except as described in the Division of Environmental Resource Permitting, Exemption No. DF03-2610821 dated November 29, 1994, attached hereto as Attachment B, and made a part hereof.
2. The rights hereby granted shall be subject to any and all prior rights of the United States and any and all prior grants by the Grantor in and to the submerged lands situated within the limits of this easement.
3. Grantee shall not damage the easement lands or unduly interfere with public or private rights therein.
4. This easement is nonexclusive, and the Grantor, or its duly authorized agent, shall retain the right to enter the property or to engage in management activities not inconsistent with the use herein provided for and shall retain the right to grant compatible uses of the property to third parties during the term of this easement.
5. Grantor, or its duly authorized agent, shall have the right at any time to inspect the works and operations of the Grantee in any matter pertaining to this easement.
6. The Grantee shall investigate all claims of every nature at its expense, and shall indemnify, defend and save and hold harmless the Grantor and the State of Florida from all claims, actions, lawsuits and demands arising out of this easement.

7. Grantee waives venue as to any litigation arising from matters relating to this easement and any such litigation between Grantor and Grantee shall be initiated and maintained only in Leon County, Florida.

8. This easement shall not be assigned or otherwise transferred without prior written consent of the Grantor or its duly authorized agent. Any assignment or other transfer without prior written consent of the Grantor shall be null and void and without legal effect.

9. The Grantee, by acceptance of this easement, binds itself, its successors and assigns, to abide by the provisions and conditions herein set forth, and said provisions and conditions shall be deemed covenants of the Grantee, its successors and assigns. In the event the Grantee fails or refuses to comply with the provisions and conditions herein set forth or in the event the Grantee violates any of the provisions and conditions herein, this easement may be terminated by the Grantor upon 30 days written notice to Grantee. If terminated, all of the above-described parcel of land shall revert to the Grantor. All costs, including attorneys' fees, incurred by the Grantor to enforce the provisions of this easement shall be paid by the Grantee. All notices required to be given to Grantee by this easement or applicable law or administrative rules shall be sufficient if sent by U.S. Mail to the following address:

Gulf Power Company
Post Office Box 1151
Pensacola, Florida 32520-0328

The Grantee agrees to notify the Grantor by certified mail of any changes to this address at least ten (10) days before the change is effective.

10. The Grantee shall assume all responsibility for liabilities that accrue to the subject property or to the improvements thereon, including any and all drainage or special assessments or taxes of every kind and description which are now or may be hereafter lawfully assessed and levied against the subject property during the effective period of this easement which result from the grant of this easement or the activities of Grantee hereunder.

11. Renewal of this easement is at the sole option of the Grantor. Such renewal shall be subject to the terms, conditions and provisions of current management standards and applicable laws, rules and regulations in effect at that time. In the event that Grantee is in full compliance with the terms of this easement, the Grantee shall be allowed a 30-day grace period after expiration of this easement to apply in writing for a renewal. If the Grantee fails to apply for a renewal within the grace period, or in the event the Grantor does not grant a renewal, the Grantee shall vacate the premises and remove all structures and equipment occupying and erected thereon at its expense.

12. If the Grantee does not remove said structures and equipment occupying and erected upon the premises after expiration or cancellation of this easement, such structures and equipment will be deemed forfeited to the Grantor, and the Grantor may authorize removal and may sell such forfeited structures and equipment after ten (10) days written notice by certified mail addressed to the Grantee at the address specified in Item 10 or at such address on record as provided to the Grantor by the Grantee. However, such remedy shall be in addition to all other remedies available to Grantor under applicable laws, rules and regulations including the right to compel removal of all structures and the right to impose administrative fines.

13. No failure, or successive failures, on the part of the Grantor to enforce any provision, nor any waiver or successive waivers on its part of any provision herein, shall operate as a discharge thereof or render the same inoperative or impair the right of the Grantor to enforce the same upon any renewal thereof or in the event of subsequent breach or breaches.

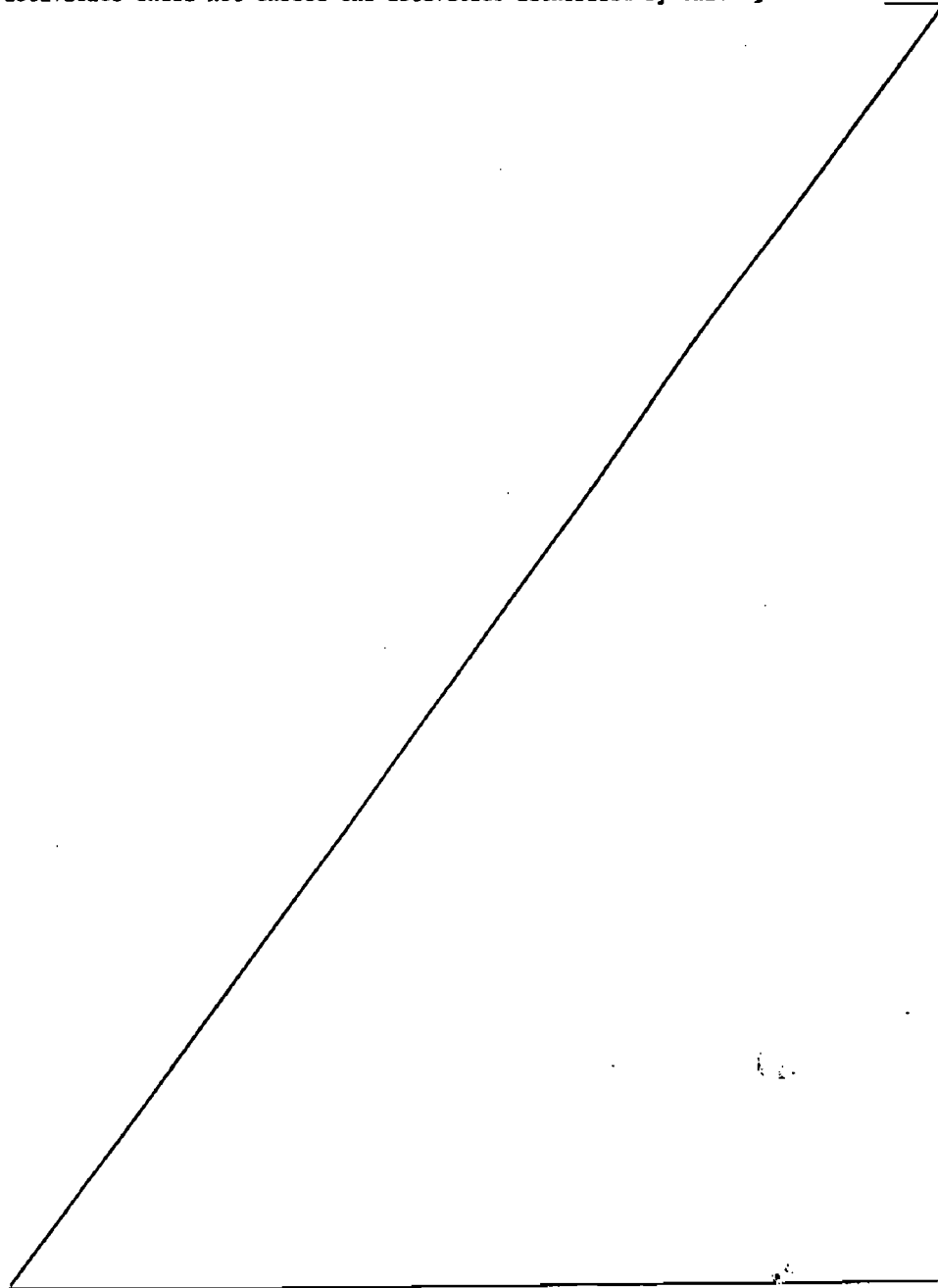
14. The Grantee, at its own expense, shall record this easement and any subsequent approved renewal and/or modified easements in the official records of the county within which the easement site is located within fourteen (14) days after receipt of a fully executed copy of this easement, and shall provide the Grantor with a copy of the recorded easement indicating the book and page at which the easement is recorded.

15. This easement is the entire and only agreement between the parties. Its provisions are not severable. Any amendment or modification to this easement must be in writing and must be accepted, acknowledged and executed by the Grantee and Grantor.

(4505-03)

16. Prior to commencement of construction and/or activities authorized herein, the Grantee shall obtain the U.S. Army Corps of Engineers (COE) permit if it is required by the COE. Any modifications to the construction and/or activities authorized herein that may be required by the COE shall require consideration by and the prior written approval of the Grantor prior to the commencement of construction and/or any activities on sovereign, submerged lands.

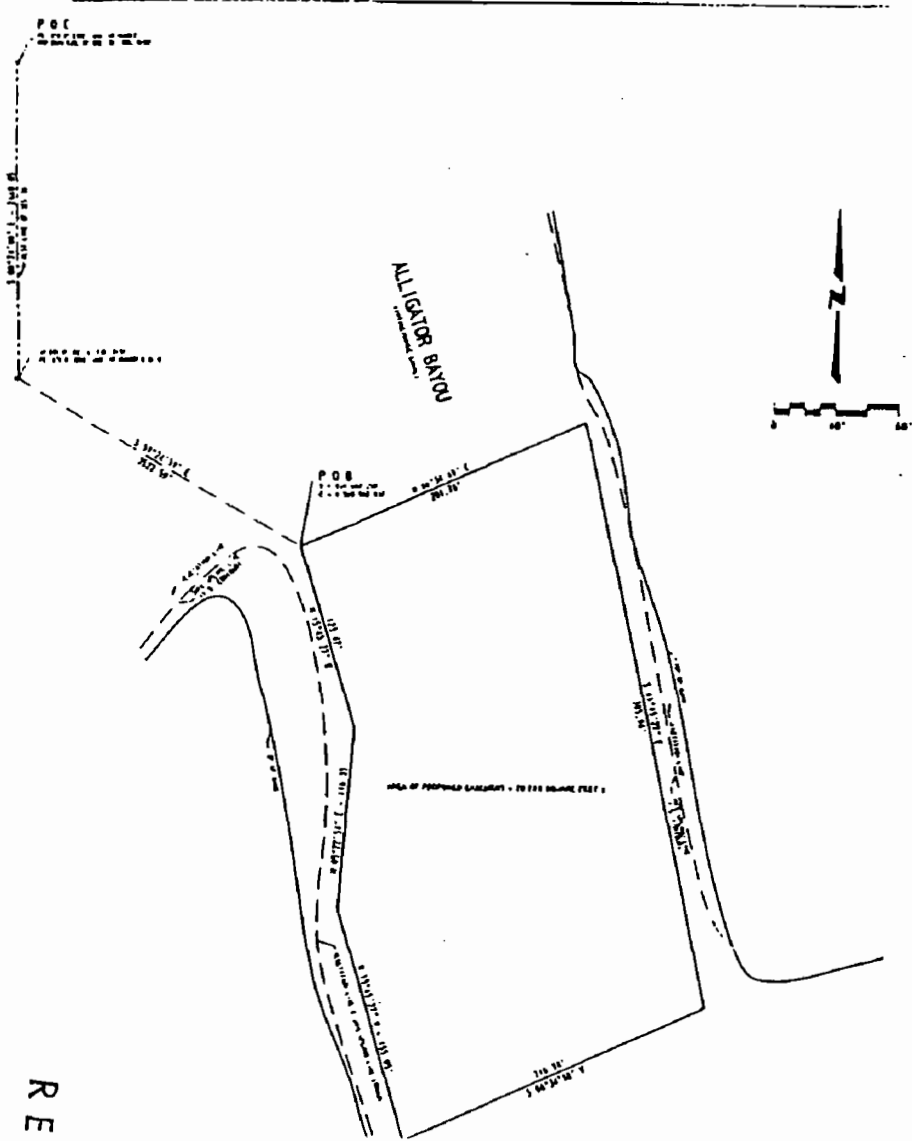
17. No additional structures and/or activities including dredging, relocation/realignment or major repairs or renovations to authorized structures, shall be erected or conducted on or over sovereignty, submerged lands without prior written consent from the Grantor, with the exception of emergency repairs. Unless specifically authorized in writing by the Grantor, such activities or structures shall be considered unauthorized and a violation of Chapter 253, Florida Statutes, and shall subject the Grantee to administrative fines under Chapter 18-14, Florida Administrative Code. If emergency repairs should have to be undertaken in the interests of public health, safety or welfare, the Grantee shall notify the Grantor of such repairs as quickly as is practicable; provided, however, that such emergency activities shall not exceed the activities authorized by this agreement.



FOR: GOLF POWER CO
DESCRIPTION OF PROPOSED
ALLIGATOR BAYOU
SECTION 26, TOWNSHIP
FLORIDA. THENCE SO
SAID SECTION 26 FOR:
SECTION 1, TOWNSHIP
FLORIDA. THENCE SO
POINT OF BEGINNING
THENCE SOUTH 17° 15'
80° 34' 47" WEST FOR 21
115 IN FEET, THENCE
NORTH: 18° 45' 37" WEST
CONTAINING 76.95 AC.
OF

OFFICIAL RECORDS
BOOK: 1574 PAGE: 815

THIS PLAN AND CONTAINED
HEREIN AND THEREON
AND THE RECORDING
OFFICE



RE
IFE
Not

Attachment A
Page 6 of 8 Pages
Easement No. 29350
(4505-03)

DESCRIPTION OF PROPOSED EASEMENT OF SUBMERGED LAND WITHIN ALLIGATOR BAYOU: COMMENCE AT THE WEST QUARTER CORNER OF SECTION 36, TOWNSHIP 2 SOUTH, RANGE 15 WEST, BAY COUNTY, FLORIDA. THENCE SOUTH 00°24'00" EAST ALONG THE WEST LINE OF SAID SECTION 36 FOR 2640.05 FEET TO THE NORTHWEST CORNER OF SECTION 1, TOWNSHIP 3 SOUTH, RANGE 15 WEST, BAY COUNTY, FLORIDA. THENCE SOUTH 59°24'59" EAST FOR 3522.59 FEET TO THE POINT OF BEGINNING. THENCE NORTH 66°34'48" EAST FOR 201.76 FEET; THENCE SOUTH 11°45'27" EAST FOR 385.96 FEET; THENCE SOUTH 66°34'48" WEST FOR 216.94 FEET; THENCE NORTH 15°45'27" WEST FOR 155.05 FEET; THENCE NORTH 05°22'54" EAST FOR 116.35 FEET; THENCE NORTH 15°45'27" WEST FOR 123.47 FEET TO THE POINT OF BEGINNING, CONTAINING 79,795 SQUARE FEET, MORE OR LESS. BEING A PORTION OF SECTION 1, TOWNSHIP 3 SOUTH, RANGE 15 WEST.

SYMBOLS AND ABBREVIATIONS

N.	NORTH
E.	EAST
S.	SOUTH
W.	WEST
SEC.	SECTION
T	TOWNSHIP
R	RANGE
°	DEGREES
'	MINUTES OR FEET
"	SECONDS OR INCHES
FD.	FOUND
COR.	CORNER
CONC.	CONCRETE
MON.	MONUMENT
NGVD	NATIONAL GEODETIC VERTICAL DATUM
NGS	NATIONAL GEODETIC SURVEY
EL.	ELEVATION
±	MORE OR LESS



Department of Environmental Protection

OFFICIAL RECORDS
BOOK: 1574 PAGE: 817

Lawton Chiles
Governor

Panama City Branch Office
2363 Jenke Avenue
Panama City, FL 32405

Virginia B. Wetherall
Secretary

November 29, 1994

Gulf Power Company
c/o M.L. Gilchrist
P.O. Box 1161
Pensacola, FL 32520

RE: DREDGE & FILL EXEMPTION
File#: DF03-2610821

County: Bay

Dear Mr. Gilchrist:

This is to acknowledge receipt of your application, file number DF03-2610821, for a permit to conduct maintenance dredging of the intake/barge canal at Gulf Power's Lansing Smith Electric Generating Plant, in accordance with Chapter 403, Florida Statutes as shown on the attached drawings. The maintenance dredging which you have proposed appears to qualify for the permit exemption described in Florida Administrative Code Rule 62-312.050(1)(e) (copy enclosed).

Any modifications in your plans should be submitted for review, as changes may result in permits being required. This letter does not relieve you from the need to obtain any other permits (local, state or federal) which may be required. A copy of your application has also been sent to the U.S. Army Corps of Engineers and to this Department's Division of State Lands for review. Consent for use of State-owned lands may be required from this Department's Division of State Lands prior to construction. For further information, you may contact Ms. Susan Radford at (904) 444-8608.

If you have any questions, please contact Brian Underwood of this office at (904) 872-4375. When referring to this project, please use the file number indicated.

Sincerely,

Gary L. Shaffer
Branch Manager

GLS:bu
Encl.: FAC 62-312.050(1)(e)
cc: DEP/Susan Radford
CDE/Doug Gilmore
Gulf Power Company/Rachell Allen

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

RCD Jul 12 1995 10:26am
HAROLD BAZZEL, CLERK

*** ENCL ***

Attachment B
Page 8 of 8 Pages
Easement No. 29350

(4505-03)

FOR Bob
 DATE 3-5-98 TIME 3:15 P.M.
 FROM Bruce Mitchell
 FIRM Air Dept. / DEP-Talla.
 PHONE 850 921-9506
 FAX AREA CODE NUMBER EXTENSION
 MOBILE AREA CODE NUMBER TIME TO CALL

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
RETURNED YOUR CALL	WILL CALL AGAIN	<input type="checkbox"/>
CAME TO SEE YOU	RUSH	<input type="checkbox"/>
WANTS TO SEE YOU	SPECIAL ATTENTION	<input type="checkbox"/>
WAITING TO SEE YOU	HOLDING LINE	<input type="checkbox"/>

MESSAGE _____

BB work 1968 aerial
 houses and
 Power Plant
 Magnolia
 4515
 4515
 4515

SIGNED Power Plant FORM 4007 MADE IN U.S.A.

Allyson Carol
 MESSAGE

mean-high water line

Surveying & Mapping office

Title determination

Jax Dist
8-4:30

- 1- Jobs
- 2- News media
- 3- Reg's Permits
- 4- Bid
- 5- Navigation
- 6-
- 7-

Pat Hanson
ext. 1640

Bill McDonald
561-220-5280
Northrup

~~DPD~~



3/9/98
6/1/98

Mobile, Ala.
334/957-6019

Bethanie Barnett
residence -
sent me aerial photos
- 1964 (mid)

Panama City Branch
950/785-5881
763-2081

Robert
Bob
850/872-4375

Taylor
72-4375

Kevin Okame - lady?
Bill

27
29
26

Civil works projects -

recommended
that I ✓
Melanie
O'Daylas Bly
278-8120
Title research

State lands

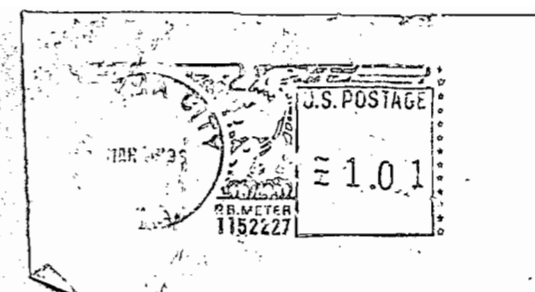
This is an open water body.

Public access - state waters bottom land

on fee simple state land (bylaws)



DEPARTMENT OF ENVIRONMENTAL PROTECTION
PANAMA CITY BRANCH OFFICE
SOUTHWOOD CENTER
2353 JENKS AVENUE
PANAMA CITY FL 32405



1st Floor

Department of Environmental Protection
111 South Magnolia
Tallahassee FL 32399

Attn: Bruce Mitchell
ms# 5505

Florida Department of
Environmental Protection

Memorandum

TO: Ms. Melanie J. Knapp
Division of State Lands
Title and Land Records
Douglas Building

FROM: Clair H. Fancy, Chief
Bureau of Air Regulation



DATE: March 7, 1998

SUBJECT: Request for Title Determination

The Title V Section is currently evaluating Gulf Power Company's Lansing Smith Utility, which is located in Bay County and just inland from North Bay and Alligator Bayou. Therefore, I am requesting that a "title determination" be made for the area outlined on the attached map. In addition, if there is any information of any surveys that have been done for this specific area by the Bureau of Survey and Mapping office, I would appreciate any information that is available.

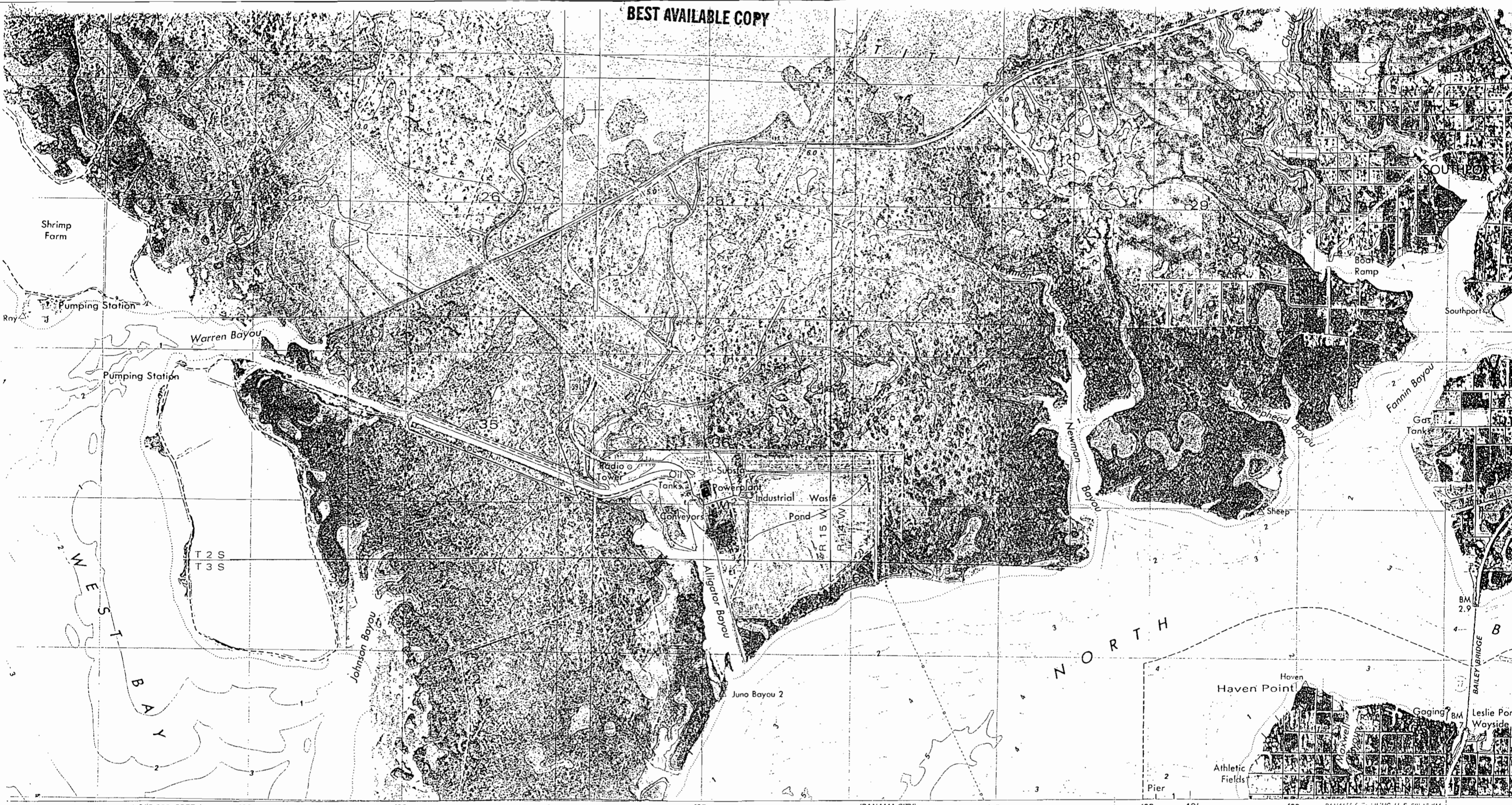
If there are any questions, please call Bruce Mitchell at 921-9506. Your assistance in this matter is very much appreciated.

CHF/bm

Attachment

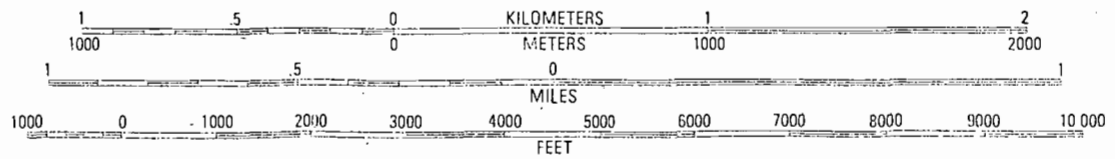
cc: S. Sheplak
P. Comer, Esq.

BEST AVAILABLE COPY



Produced by the United States Geological Survey
National Ocean Survey
Control by USGS and NOS/NOAA
Photomaps prepared from aerial photograph taken
January 18, 1976. Compiled by photogrammetric methods
from aerial photographs taken January 1975 and planimetric
photographs 1978. Field checked 1977. Map edited 1982
Replaces topographic map dated 1943
Symmetry compiled by the National Ocean Survey from
coordinated hydrographic surveys
Information is not intended for navigational purposes
Low water (dotted) line and mean high water (solid) line
Compiled by NOS from tide-coordinated aerial photographs
Present shoreline (outer edge of vegetation) shown
from photomaps

UTM GRID AND 1982 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET



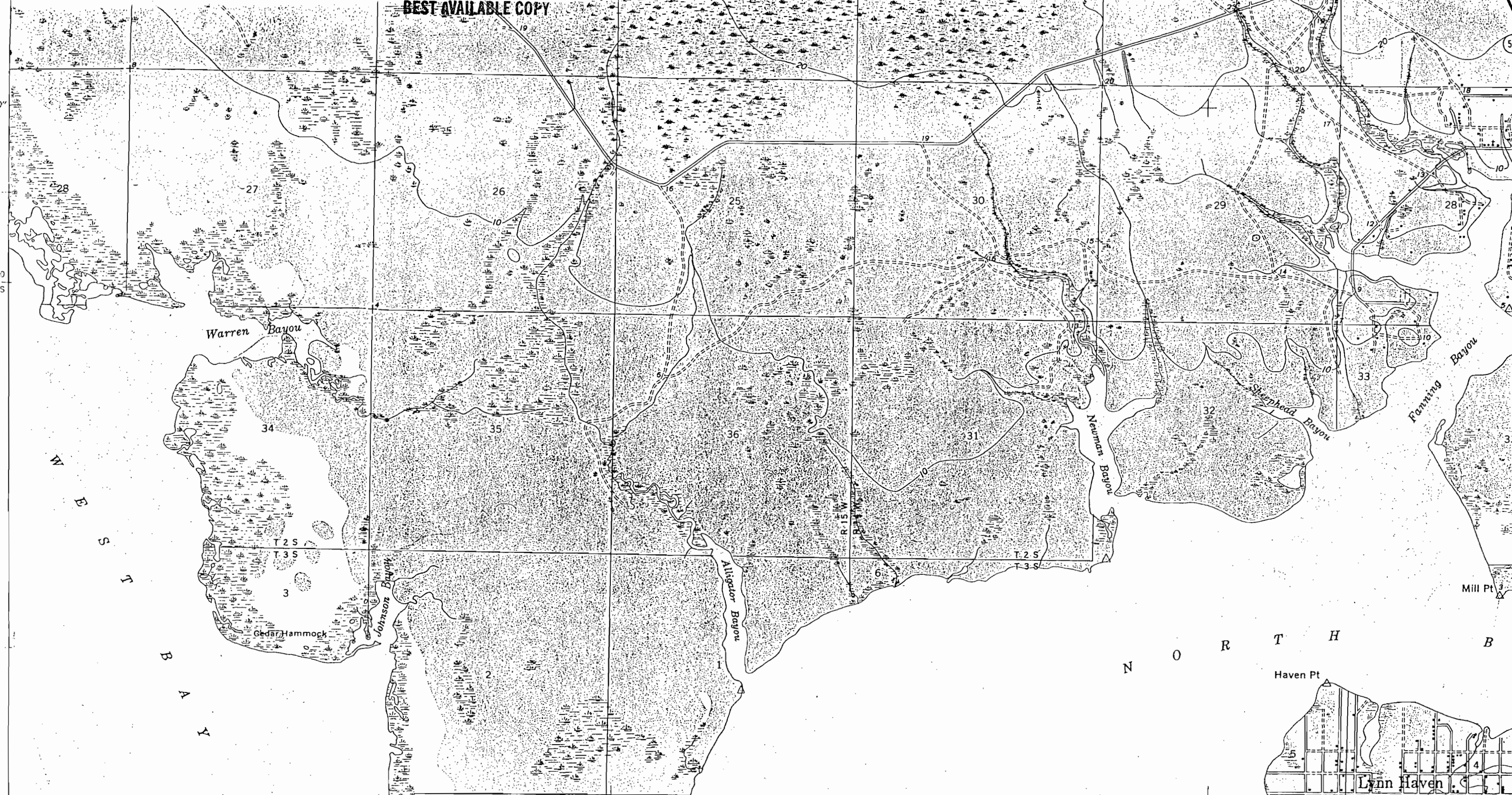
CONTOUR INTERVAL 2 METERS
SUPPLEMENTARY CONTOUR INTERVAL 1 METER
DASHED SUPPLEMENTARY CONTOURS ARE APPROXIMATE
NATIONAL GEODETIC VERTICAL DATUM OF 1929
CONTROL ELEVATIONS SHOWN TO THE NEAREST 0.1 METER
OTHER ELEVATIONS SHOWN TO THE NEAREST 0.5 METER

NATIONAL OCEAN SURVEY
HYDROGRAPHIC SURVEY INDEX

SOUTHPORT 1982

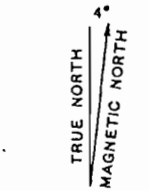
Primary high water surface
Secondary high water surface
Intertidal

BEST AVAILABLE COPY

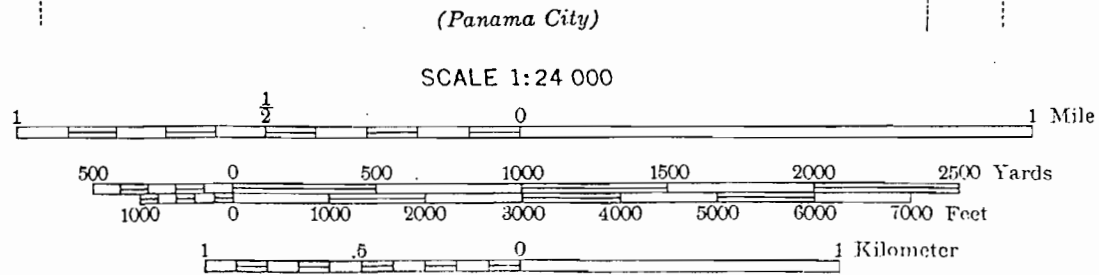


Topography by F. H. Sargent, B. O. Fridge,
and R. J. Bavy
Surveyed in 1943

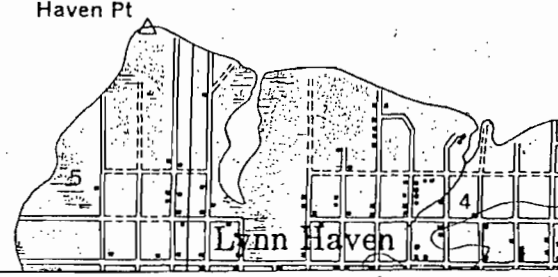
SOUTHPORT
1944 ed.



APPROXIMATE MEAN
DECLINATION, 1943



Contour interval 10 feet
Datum is mean sea level



PANAMA CITY (JUNC. U. S. 98) &
WEWAHITCHKA 3

MR 1908
INTERIOR—GEOLOGICAL SURVEY, WASHINGTON, D. C.—1960

ROAD CLASSIFICATION 1943

Dependable hard-surface heavy-duty road	Loose surface, graded	U. S. Ro
Secondary hard-surface all weather road	Unsurfaced, graded dry weather roads	State Ro
	Dirt road	

More than two lanes indicated along road with tick at point of change

3 LANE 1 4 LANE

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6000



November 12, 1997

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Dear Mr. Sheplak:

RE: PLANT SMITH TITLE V RESPONSIBLE OFFICIAL CHANGE:
DRAFT PERMIT No: 0050014-001-AV

Attached, please find Gulf Power's request change for "Responsible Official" regarding the Draft Title V Permit (0050014-001-AV) issued on October 6, 1997 for the Lansing Smith Electric Generating Plant.

If you have any questions or need further information regarding this request, please call me at (850) 444.6527.

Sincerely,

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

G. Dwain Waters, QEP
Air Quality Programs Coordinator,

cc: Robert G. Moore., Gulf Power Company
James O Vick, Gulf Power Company
L. A. Jeffers, Gulf Power Company
Stan Houston, Gulf Power Company
Danny Herrin, Southern Company Services

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official :

Name : Robert G. Moore.
Title : V.P. Power Generation/Transmission

2. Owner or Authorized Representative or Responsible Official Mailing Address :

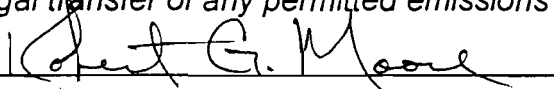
Organization/Firm : Gulf Power Company
Street Address : One Energy Place
City : Pensacola
State : FL Zip Code : 32520-0100

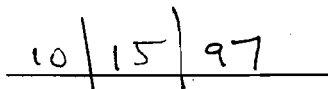
3. Owner/Authorized Representative or Responsible Official Telephone Numbers :

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

4. Owner/Authorized Representative or Responsible Official Statement :

I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. 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. 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 any permitted emissions units.*


Signature


Date

* Attach letter of authorization if not currently on file.

Jonathan Holton

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

OGC No. _____

Gulf Power Company
One Energy Place
Pensacola, FL 32520

DRAFT Permit No.: 0050014-001-AV
Smith Plant
Bay County

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 28-106.111(3) and 62-103.050(1), an extension of time, to and including December 31, 1997, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, Gulf states the following:

1. On or about October 13, 1997, Gulf received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0050014-001-AV) for the Smith Plant located in Bay County, Florida. Along with the Intent to Issue, Gulf received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."

2. Based on Gulf's review, the draft permit and associated documents contain several provisions that warrant clarification or correction.

3. Gulf is in the process of conducting studies in an effort to respond to concerns raised by the Department in the draft permit.

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OCT 20 1997
BUREAU OF
AIR REGULATION

4. Representatives of Gulf intend to correspond with staff of the Department's Bureau of Air Regulation in the near future in an effort to resolve all issues.

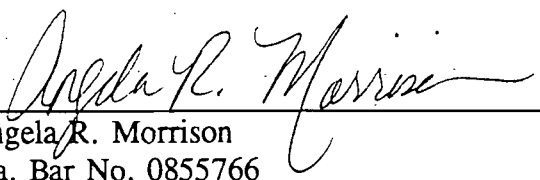
5. This request is filed simply as a protective measure to avoid waiver of Gulf's right to challenge certain conditions contained in the draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing.

6. Jonathan Holtom with the Bureau of Air Regulation has agreed to an extension until December 31, 1997, on behalf of the Department. Counsel for Gulf has contacted Jeffrey Brown with the Department's Office of General Counsel regarding this request, and he has no objection.

WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0050014-001-AV be formally extended to and including December 31, 1997.

Respectfully submitted this 17th day of October, 1997.

HOPPING GREEN SAMS & SMITH, P.A.



Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(904) 222-7500

Attorney for GULF POWER COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following
by U.S. Mail on this 17th day of October, 1997:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600



100333

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6000

Jonathan Walton

October 3, 1997



Mr. Scott M. Sheplak
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Sheplak:

Re: GULF POWER COMPANY ACID RAIN PHASE II APPLICATION REVISION
PLANT CRIST, PLANT SCHOLZ, PLANT LANSING SMITH

Gulf Power Company hereby requests a revision of our active Acid Rain Phase II and Title V permit applications on file with the Florida Department of Environmental Protection. Our request is pursuant to a change of the "Designated Representative" for Gulf Power under the Acid Rain Program. These revisions (3) were submitted to the Environmental Protection Agency on April 3, 1997 as required under 40 CFR 72.24 of the Clean Air Act Amendments of 1990. Copies are attached for your review. Please update Gulf Power's active Acid Rain Phase II and Title V permit applications for Plant Crist, Plant Scholz and Plant Lansing Smith regarding this change.

If you have questions or need further information regarding the Designated Representative under the Acid Rain Program, please call me at (904) 444-6527.

Sincerely,

G. Dwain Waters
Air Quality Programs Coordinator, QEP

Attachments (3)
See Distribution Sheet

RECEIVED

OCT 06 1997

BUREAU OF
AIR REGULATION

Mr. Scott M. Sheplak
April 7, 1997
Page 2

DISTRIBUTION SHEET

cc w/oatt: J. O. Vick, Gulf Power Company
J. M. Dominey, Gulf Power Company
S. H. Houston, Gulf Power Company
K. Peacock, Gulf Power Company



Certificate of Representation

For more information, see instructions and refer to 40 CFR 72.24

This submission is: New Revised

This submission includes combustion or process sources under 40 CFR part 74

STEP 1
Identify the source by plant name, State, and, if applicable, ORIS code from NADB.

Lansing Smith Electric Generating Plant Plant Name	FL State	643 Oris Code
--	--------------------	-------------------------

STEP 2
Enter requested information for the designated representative.

Name Robert G. Moore	
Address One Energy Place Pensacola, Florida 32520-0100	
Phone Number (850) 444-6383	Fax Number (850) 444-6744

STEP 3
Enter requested information for the alternate designated representative, if applicable.

Name	
Address	
Phone Number	Fax Number

STEP 4
Complete Step 5, read the certifications, and sign and date. For a designated representative of a combustion or process source under 40 CFR part 74, the references in the certifications to "affected unit" or "affected units" also apply to the combustion or process source under 40 CFR part 74 and the references to "affected source" also apply to the source at which the combustion or process source is located.

I certify that I was selected as the designated representative or alternate designated representative, as applicable, by an agreement binding on the owners and operators of the affected source and each affected unit at the source.

I certify that I have given notice of the agreement, selecting me as the designated representative or alternate designated representative, as applicable, for the affected source and each affected unit at the source identified in this certificate of representation, daily for a period of one week in a newspaper of general circulation in the area where the source is located or in a State publication designed to give general public notice.

I certify that I have all necessary authority to carry out my duties and responsibilities under the Acid Rain Program on behalf of the owners and operators of the affected source and of each affected unit at the source and that each such owner and operator shall be fully bound by my actions, inactions, or submissions.

I certify that I shall abide by any fiduciary responsibilities imposed by the agreement by which I was selected as designated representative or alternate designated representative, as applicable.

I certify that the owners and operators of the affected source and of each affected unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, an affected unit, or where a utility or industrial customer purchases power from an affected unit under life-of-the-unit, firm power contractual arrangements, I certify that:

I have given a written notice of my selection as the designated representative or alternate designated representative, as applicable, and of the agreement by which I was selected to each owner and operator of the affected source and of each affected unit at the source; and

Allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement or, if such multiple holders have expressly provided for a different distribution of allowances by contract, that allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in accordance with the contract.

Lansing Smith Electric Generating Plant

Plant Name (from Step 1)

The agreement by which I was selected as the alternate designated representative, if applicable, includes a procedure for the owners and operators of the source and affected units at the source to authorize the alternate designated representative to act in lieu of the designated representative.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Signature (designated representative) <i>Robert G. Moore</i>	Date 10/1/97
Signature (alternate designated representative)	Date

STEP 5
Provide the name of every owner and operator of the source and each affected unit (or combustion or process source) at the source. Identify the units they own and/or operate by boiler ID# from NADB, if applicable. For owners only, identify each state or local utility regulatory authority with ratemaking jurisdiction over each owner, if applicable.

Name Lansing Smith Electric Generating Plant					<input type="checkbox"/> Owner	<input checked="" type="checkbox"/> Operator
ID# 1	ID# 2	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities Florida Public Service Commission						

Name					<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities						

Name					<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities						

Name					<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities						

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

1. ~~John~~ Jonathan Holton

2. MS 5505

3.

4.

Remarks:

RE: Gulf Power Boiler Plate
Ratings.

I looked through the compliance
files. All I could find is the attached
1991 Letter. It is a 1990 inventory
that lists Btu/unit.

RECEIVED

SEP 26 1997

BUREAU OF
AIR REGULATION

From:

Carol Meltz

Date

9/24/97

Phone

SC 693-8364

Gulf Power Company
500 Bayfront Parkway
Post Office Box 1151
Pensacola, FL 32520-1151
Telephone 904 444-6111

S₀₂ Inventory



Gulf Power

the southern electric system

September 27, 1991

Ed w
9/27

Mr. Ed K. Middleswart
Florida Department of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Dear Mr. Middleswart:

1990 EMISSIONS INVENTORY

As per your request during our meeting on September 9, 1991, please find enclosed the 1990 emissions inventory for sulfur dioxide and particulate matter at Gulf Power's generating facilities. A realistic estimate for nitrogen oxide emissions is not currently available because we feel the AP-42 calculation under estimates emissions for the type of boilers operated by Gulf Power. I have included however, several background papers regarding NO_x formation and control strategies.

Should you have any questions, please feel free to call me at 444-6527.

Sincerely,

G. Dwain Waters
Senior Environmental Affairs Specialist

rc/0013GDW

Enclosures

cc: M. L. Gilchrist
J. O. Vick

RECEIVED

SEP 27 1991

Northwest Florida
DER

GULF POWER COMPANY EMISSIONS INVENTORY

1990

PLANT	FUEL TYPE	FUEL QUANTITY	BTU/UNIT	BTU CONSUMED (MILLION)	PARTICULATE (TONS)	SULFUR DIOXIDE (TONS)
CRIST 1	GAS	196788	1000	196788	0.30	0.06
	NO.6 OIL	215544	148055	31912	1.94	25.38
2	GAS	219126	1000	219126	0.33	0.07
	NO.6 OIL	164724	147959	24372	1.48	19.40
3	GAS	402228	1000	402228	0.60	0.12
	NO.6 OIL	133600	148000	19773	1.20	15.73
4	GAS	76750	1000	76750	0.12	0.02
	NO.2 OIL	32359	137002	4433	0.03	1.15
	COAL	176870	11956	4229315	27.27	9691.59
5	GAS	76708	1000	76708	0.12	0.02
	NO.2 OIL	33205	136942	4547	0.03	1.78
	COAL	170858	11976	4092388	72.97	9362.16
6	GAS	23990	1000	23990	0.04	0.01
	NO.2 OIL	100672	136979	13790	0.10	3.57
	COAL	528149	11960	12633329	225.29	28939.93
7	GAS	41055	1000	41055	0.06	0.01
	NO.2 OIL	185342	136992	25390	0.19	6.58
	COAL	914760	11965	21890208	1075.50	50124.27
SUBTOTAL	GAS	1036645		1036645	1.56	0.31
	NO.6 OIL	513868		76058	4.62	60.506
	NO.2 OIL	351578		48161	0.35	13.08
	COAL	1790637		42845240	1401.03	98117.95
CRIST TOTAL			44006104	1407.56	98191.85	
(4.461b/MBTU)						
SMITH 1	NO.2 OIL	107067	136998	14668	0.11	3.80
	COAL	300284	12050	7236844	77.33	15927.08
2	NO.2 OIL	174148	136996	23858	0.17	6.18
	COAL	337560	12069	8148016	109.67	17904.17
CT	NO.2 OIL	196289	137001	26892	0.49	6.87
SUBTOTAL	NO.2 OIL	477504		65417	0.77	16.85
	COAL	637844		15384860	187.00	33831.25
SMITH TOTAL				15450278	187.77	33848.10
(4.381b/MBTU)						
SCHOLZ 1	NO.2 OIL	12819	137000	1756	0.01	0.46
	COAL	131745	12348	3253581	17.76	7218.96
2	NO.2 OIL	11972	137213	1643	0.01	0.43
	COAL	117887	12348	2911335	15.95	6459.60
SUBTOTAL	NO.2 OIL	24791		3399	0.03	0.88
	COAL	249632		6164916	33.71	13678.56
SCHOLZ TOTAL				6168315	33.74	13679.44
(4.441b/MBTU)						
SUBTOTALS	GAS	1036645		1036645	1.56	0.31
	NO.6 OIL	513868		76058	4.62	60.506
	NO.2 OIL	853873		116977	1.15	30.81
	COAL	2678113		64395017	1621.74	145627.76
	TOTAL			65624696	1629.06	145719.39
(4.441b/MBTU)						

Handwritten notes:
 CRIST TOTAL: (98118) 2000 = 4.58
 42845240
 98117.95 4.58
 98191.85 4.46
 (4.461b/MBTU)

**AMBIENT AIR QUALITY STANDARDS
SULFUR DIOXIDE**

State of Florida - Rule 62-204.240(1), F.A.C.

3 - Hour Maximum	1/year	1,300 ug/m ³	(0.5 ppm)
24 - Hour Maximum	1/year	260 ug/m ³	(0.1 ppm)
Annual Arithmetic Mean		60 ug/m ³	(0.02 ppm)

United States Environmental Protection Agency - 40 CFR 50

3 - Hour Maximum	1/year	1,300 ug/m ³
24 - Hour Maximum	1/year	365 ug/m ³
Annual Arithmetic Mean		80 ug/m ³

Rule 62-204.240(1), F.A.C.
Florida's SO₂ standards.

Rule 62-296.405(1)(c)3, F.A.C.
Ambient SO₂ & boilers.

Dunham,

rule cites for
Gulf Power emissions
limit restrictions on
SO₂.
SMA
4/24

FAX TRANSMITTAL

TO: Dwain Waters
FAX NUMBER: 850-448-6217
FROM: Jonathan Holtom
DATE: July 24, 1997
RE: Smith Plant Title V application information questions

Number of pages (including this cover page): 1.

Do Units 1 and 2 have flue gas desulfurization (FGD) devices?

Is there an auxiliary boiler on site? Used for soil remediation?

Please provide answers by either calling me at (850) 488-1344 or by faxing me at (850) 922-6979.

Thank you for your help.

500 Bayfront Parkway
Pensacola, FL 32520

Tel 904.444.6000



April 7, 1997

Mr. Scott M. Sheplak
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
APR 10 1997
BUREAU OF
AIR REGULATION

Dear Mr. Sheplak:

Re: GULF POWER COMPANY TITLE V APPLICATION REVISION
GULF POWER COMPANY ACID RAIN PHASE II APPLICATION REVISION
PLANT CRIST, PLANT SCHOLZ, PLANT LANSING SMITH

Gulf Power Company hereby requests a revision of our active Acid Rain Phase II and Title V permit applications on file with the Florida Department of Environmental Protection. Our request is pursuant to a change of the "Designated Representative" for Gulf Power under the Acid Rain Program. These revisions (3) were submitted to the Environmental Protection Agency on April 3, 1997 as required under 40 CFR 72.24 of the Clean Air Act Amendments of 1990. Copies are attached for your review. Please update Gulf Power's active Acid Rain Phase II and Title V permit applications for Plant Crist, Plant Scholz and Plant Lansing Smith regarding this change.

If you have questions or need further information regarding the Designated Representative under the Acid Rain Program, please call me at (904) 444-6527.

Sincerely,

A handwritten signature in cursive script that reads "Dwain Waters".

G. Dwain Waters
Air Quality Programs Coordinator, QEP

Attachments (3)
See Distribution Sheet

DISTRIBUTION SHEET

cc w/oatt: G. Edison Holland, Jr, Gulf Power Company
J. O. Vick, Gulf Power Company
J. M. Dominey, Gulf Power Company
S. H. Houston, Gulf Power Company
K. Peacock, Gulf Power Company
C. R. Lee, Gulf Power Company
Joseph W. Martin, Gulf Power Company
Lewis A. Jeffers, Gulf Power Company

cc: w/att: K. F. Kosky, KBN Engineering
Angela Morrison, Hopping, Green, Sams & Smith
Danny Herrin, Southern Company Services



Certificate of Representation

For more information, see instructions and refer to 40 CFR 72.24

This submission is: New Revised

This submission includes combustion or process sources under 40 CFR part 74

STEP 1
Identify the source by plant name, State, and, if applicable, ORIS code from NADB.

Lansing Smith Electric Generating Plant Plant Name	FL State	643 Oris Code
--	--------------------	-------------------------

STEP 2
Enter requested information for the designated representative.

Name G. Edison Holland, Jr.	
Address 500 Bayfront Parkway Pensacola, Florida 32520-0100	
Phone Number (904) 444-6393	Fax Number (904) 444-6744

STEP 3
Enter requested information for the alternate designated representative, if applicable.

Name	
Address	
Phone Number	Fax Number

STEP 4
Complete Step 5, read the certifications, and sign and date. For a designated representative of a combustion or process source under 40 CFR part 74, the references in the certifications to "affected unit" or "affected units" also apply to the combustion or process source under 40 CFR part 74 and the references to "affected source" also apply to the source at which the combustion or process source is located.

I certify that I was selected as the designated representative or alternate designated representative, as applicable, by an agreement binding on the owners and operators of the affected source and each affected unit at the source.

I certify that I have given notice of the agreement, selecting me as the designated representative or alternate designated representative, as applicable, for the affected source and each affected unit at the source identified in this certificate of representation, daily for a period of one week in a newspaper of general circulation in the area where the source is located or in a State publication designed to give general public notice.

I certify that I have all necessary authority to carry out my duties and responsibilities under the Acid Rain Program on behalf of the owners and operators of the affected source and of each affected unit at the source and that each such owner and operator shall be fully bound by my actions, inactions, or submissions.

I certify that I shall abide by any fiduciary responsibilities imposed by the agreement by which I was selected as designated representative or alternate designated representative, as applicable.

I certify that the owners and operators of the affected source and of each affected unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, an affected unit, or where a utility or industrial customer purchases power from an affected unit under life-of-the-unit, firm power contractual arrangements, I certify that:

I have given a written notice of my selection as the designated representative or alternate designated representative, as applicable, and of the agreement by which I was selected to each owner and operator of the affected source and of each affected unit at the source; and

Allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement or, if such multiple holders have expressly provided for a different distribution of allowances by contract, that allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in accordance with the contract.

Lansing Smith Electric Generating Plant
 Plant Name (from Step 1)

The agreement by which I was selected as the alternate designated representative, if applicable, includes a procedure for the owners and operators of the source and affected units at the source to authorize the alternate designated representative to act in lieu of the designated representative.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

<i>[Signature]</i> Signature (designated representative)	4/2/11 Date
 Signature (alternate designated representative)	 Date

STEP 5
 Provide the name of every owner and operator of the source and each affected unit (or combustion or process source) at the source. Identify the units they own and/or operate by boiler ID# from NAJB, if applicable. For owners only, identify each state or local utility regulatory authority with ratemaking jurisdiction over each owner, if applicable.

Name Lansing Smith Electric Generating Plant						<input type="checkbox"/> Owner	<input checked="" type="checkbox"/> Operator
ID# 1	ID# 2	ID#	ID#	ID#	ID#	ID#	
ID#	ID#	ID#	ID#	ID#	ID#	ID#	
Regulatory Authorities Florida Public Service Commission							

Name						<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#	
ID#	ID#	ID#	ID#	ID#	ID#	ID#	
Regulatory Authorities							

Name						<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#	
ID#	ID#	ID#	ID#	ID#	ID#	ID#	
Regulatory Authorities							

Name						<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#	
ID#	ID#	ID#	ID#	ID#	ID#	ID#	
Regulatory Authorities							

Phase II Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission is: New Revised

STEP 1
Identify the source by plant name, State, and ORIS code from NADB

Lansing Smith <small>Plant Name</small>	FL <small>State</small>	643 <small>ORIS Code</small>
--	----------------------------	---------------------------------

STEP 2
Enter the boiler ID# from NADB for each affected unit, and indicate whether a repowering plan is being submitted for the unit by entering "yes" or "no" at column c. For new units, enter the requested information in columns d and e

Compliance Plan				
a Boiler ID#	b Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	c Repowering Plan	d New Units Commence Operation Date	e New Units Monitor Certification Deadline
1	Yes	No		
2	Yes	No		
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			

STEP 3
Check the box if the response in column c of Step 2 is "Yes" for any unit

For each unit that will be repowered, the Repowering Extension Plan form is included and the Repowering Technology Petition form has been submitted or will be submitted by June 1, 1997.

Plant Name (from Step 1)

STEP 4

Read the standard requirements and certification, enter the name of the designated representative, and sign and date

Standard RequirementsPermit Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72, Rules 62-214.320 and 330, F.A.C. in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the permitting authority; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 72.6(a)(2)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(i) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

Plant Name (from Step 1)

Recordkeeping and Reporting Requirements (cont.)

(iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.


- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
- (6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 75, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities. No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regarding electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	M. L. Gilchrist	
Signature		Date 12/8/95

STEP 5 (optional)
Enter the source AIRS
and FINDS identification
numbers, if known

AIRS
FINDS

Section IV. This section is the Acid Rain Part.

Acid Rain Part, Phase II

Operated by: Gulf Power Company

ORIS code: 643

Effective:

The emissions units listed below are regulated under Acid Rain Part, Phase II.

E.U.

<u>ID No.</u>	<u>Description</u>
01	Boiler
02	Boiler

1. The Acid Rain Part application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

- a. DEP Form No. 62-210.900(1)(a), dated 07/01/95.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

2. Sulfur dioxide (SO₂) allowance allocations and nitrogen oxide (NO_x) requirements for each Acid Rain unit:

	Year	2000	2001	2002	2003
ID No. 01 1	SO ₂ allowances, under Table 2, 3, or 4 of 40 CFR 73	8424*	8424*		
	NO _x limit	**	**		
ID No. 02 2	SO ₂ allowances, under Table 2, 3, or 4 of 40 CFR 73	7539*	7539*		
	NO _x limit	**	**		

*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.

**By January 1, 1999, this Part will be reopened to add NO_x requirements in accordance with the regulations implementing section 407 of the Clean Air Act.

3. Comments, notes, and justifications: None.

Section V. Attachments and relevant documents.

Acid Rain Application/Compliance Plan received 12/18/95.

Phase II Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission is: New Revised

STEP 1
Identify the source by plant name, State, and ORIS code from NADB

Lansing Smith Plant Name	FL State	643 ORIS Code
-----------------------------	-------------	------------------

STEP 2
Enter the boiler ID# from NADB for each affected unit, and indicate whether a repowering plan is being submitted for the unit by entering "yes" or "no" at column c. For new units, enter the requested information in columns d and e

Compliance Plan				
a	b	c	d	e
Boiler ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	Repowering Plan	New Units Commence Operation Date	New Units Monitor Certification Deadline
1	Yes	No		
2	Yes	No		
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			

STEP 3
Check the box if the response in column c of Step 2 is "Yes" for any unit

For each unit that will be repowered, the Repowering Extension Plan form is included and the Repowering Technology Petition form has been submitted or will be submitted by June 1, 1997.

Plant Name (from Step 1)

STEP 4

Read the standard requirements and certification, enter the name of the designated representative, and sign and date

Standard RequirementsPermit Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72, Rules 62-214.320 and 330, F.A.C. in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the permitting authority; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(i) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

Plant Name (from Step 1)

Recordkeeping and Reporting Requirements (cont.)

(iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.


- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
- (6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 75, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities. No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	M. L. Gilchrist	
Signature		Date
		12/8/95

STEP 5 (optional)
Enter the source AIRS
and FINDS identification
numbers, if known

AIRS
FINDS

Memorandum

Florida Department of
Environmental Protection

TO: Ed Middleswart, NWD

FROM: Bruce Mitchell *for BM*

DATE: November 18, 1996

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
Gulf Power Company: 0050014-001-AV

The Title V operating permit application package for the referenced facility is being processed in Tallahassee. The application was previously forwarded to your office for your files and future reference. Please have someone review the package for completeness and respond in writing by December 15, 1996, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Jonathan Holtom, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bm

cc: Andy Allen

Barb,

I am starting to look at the Title V application for Gulf Power's Smith plant. Please prepare notice for NWD (Ed Middleswart) informing them of same. Please ask them to respond by December 15, 1996.

Thanks, Jonathan.

Date: 11/15/96 3:58:35 PM
From: Jonathan Holtom TAL
Subject: Review notice to NWD for Gulf Power - Smith Plant

(FOR INTERNAL USE ONLY)

State of Florida summary checklist for initial Title V permit applications for 'existing' Title V Sources

Facility Owner/Operator Name: Gulf Power Company
Facility ID No.: 0050014 Site Name: Wansing Smith Electric Generating Plant
County: Bay
application receipt date 6/14/96

I. Preliminary scanning of application submitted.

- a. Was application submitted to correct permitting authority? Y N
- b. Was an application filed? Y* N
- c. Was the application filed timely? Y* N
- d. Application format filed [check one].
Hard copy of official version of form? ELSA? 1.3(b)
A facsimile of official version of form? Some combination?
- e. 4 copies (paper/electronic) submitted? Y N
- f. Electronic diskettes protected/virus scanned/marked? Y N N/A
by _____ date ___/___/___
- g. Entire hard copy of Section I. provided (Pages 1-8 of form)? Y N
Facility identified (Page 1)? [if not complete a Page 1] Y* [Attached R.O. certification signed and dated (Page 2)? Y* N
P.E. certification signed and dated (Page 7)? Y* N
- h. Any confidential information submitted? Y N
If yes, R.O. provided hard copy to us and EPA? Y* N
If yes, hard copy locked up and note filed with application? Y* N
- i. Type of application filed.
TV application for 'existing' Title V Source only? Y N
Any units subject to acid rain? Y N

Note(s): [*] = mandatory.

Comment(s): use hard copy as the original submittal due to ELSA problems.

Reviewer's initials RAM date 6/17/96 Concurrence initials _____ date ___/___/___

State of Florida summary checklist for initial Title V permit applications for 'existing' Title V Sources (cont'd)

II. Application logging.

ARMS Permit Number assigned 0050014-001-AV
logged into ARMS by initials JH date 7/25/96

III. Initial distribution of application.

a. Disposition of 4 paper/electronic copies submitted:

- 1- Clean originals to file? Y___ N___
- 1- ___ District Y___ N___
- 1- _____ County [affected local program]? Y___ N___
- 1- Permit engineer(s) _____, _____

b. Disposition of electronic files submitted:

copy placed onto PC? Y___ N___

c. Disposition of ELSA submitted:

version used [circle]: 1.0 ___ 1.1 ___ 1.2.1 ___ 1.3 ___ 1.3a ___ 1.3b

Uploaded to EARS? Y N___

by JH date 8/27/96

d. Electronic information submitted previewed? Y___ N___ N/A___

Comment(s): _____

{this checklist was developed from Rule 62-213.420(1)(b)2., F.A.C. and DARM policy}



Jeb Bush
Governor

Jonathan Holtem

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Mr. Robert G. Moore
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0100

FINAL Permit No.: 0050014-001-AV
Smith Electric Generating Plant

Enclosed is FINAL Permit Number 0050014-001-AV for the operation of the Lansing Smith Electric Generating Plant located at 4300 County Road, Bay County, issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order (permit) has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by the filing of a Notice of Appeal pursuant to 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, 3900 Commonwealth Boulevard, Mail Station #35, 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 of Appeal must be filed within thirty days from the date this notice is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

C. H. Fancy, P.E.
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 permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 12/20/99 to the person(s) listed, or as otherwise noted:

- Mr. Robert G. Moore*
- Mr. Charles D. McCrary*
- Ms. Gail Kamaras, LEAF*
- Mr. Kennard Kosky, P.E., Golder Associates
- Mr. Dwain Waters, Gulf Power Company
- Mr. Ed K. Middleswart, DEP, Northwest District Office
- Mr. R. Douglas Neeley, USEPA, Region 4 (INTERNET E-mail Memorandum)
- Ms. Elizabeth Bartlett, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

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.

Barbara J. Portwell 12/20/99
(Clerk) (Date)

December 2, 1999

4APT-ARB

C.H. Fancy, P.E.
Chief, Bureau of Air Regulation
Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: EPA_s Objection to Proposed Title V Permit for
Gulf Power - Smith Plant, Permit Number 0050014-001-AV

Dear Mr. Fancy:

The purpose of this letter is to acknowledge the receipt of the State of Florida's proposed title V permit for the Gulf Power Company - Smith Plant, which was posted on DEP's web site on November 8, 1999. U.S. Environmental Protection Agency (EPA) Region 4 has completed its review of the proposed permit and believes that the State has sufficiently addressed each of the comments made by Region 4 on the draft permit. Therefore, EPA does not plan to object to this permit. Please note, however, that our opportunity for review and comment on this permit does not prevent EPA from taking enforcement action for issues that were not raised during permit review. After final issuance, this permit may be reopened if EPA or the permitting authority later determines that it must be revised or revoked to assure compliance with applicable requirements.

We commend the efforts of your staff for facilitating the resolution of the permit issues. If you have any questions about this letter, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141.

Sincerely,

/s/ Paul Wagner, for

R. Douglas Neeley, Chief
Air and Radiation Technology Branch
Air Pesticides and Toxics
Management Branch

cc: Mr. Robert G. Moore, Gulf Power Company



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

DEC 6 1999

Jonathan Holloway
RECEIVED

DEC 08 1999

BUREAU OF AIR REGULATION

4APT-ARB

C.H. Fancy, P.E.
Chief, Bureau of Air Regulation
Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: EPA's Objection to Proposed Title V Permit for
Gulf Power - Smith Plant, Permit Number 0050014-001-AV

Dear Mr. Fancy:

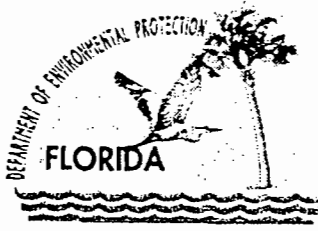
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We commend the efforts of your staff for facilitating the resolution of the permit issues. If you have any questions about this letter, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141.

Sincerely,

R. Douglas Neeley, Chief
Air and Radiation Technology Branch
Air Pesticides and Toxics
Management Branch

cc: Mr. Robert G. Moore, Gulf Power Company



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

PROPOSED Permit Electronic Posting Courtesy Notification

Gulf Power Company
Lansing Smith Electric Generating Plant
Facility ID No.: 0050014
Bay County

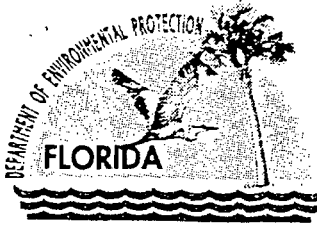
Initial Title V Air Operation Permit
PROPOSED Permit No.: 0050014-001-AV

The electronic version of the PROPOSED permit was posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review on November 8, 1999.

USEPA's review period ends on the 45th day after the permit posting date. Day 45 is December 22, 1999. If an objection (veto) is received from USEPA, the permitting authority will provide a copy of the objection to the applicant.

Provided an objection is not received from USEPA, the PROPOSED permit will become a FINAL permit by operation of law on the 55th day after the permit posting date. Day 55 is January 1, 2000.

The web site address is <http://www2.dep.state.fl.us/air>.



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

November 8, 1999

Mr. Robert G. Moore
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0100

Re: PROPOSED Title V Permit No.: 0050014-001-AV
Smith Electric Generating Plant

Dear Mr. Moore:


One copy of the "PROPOSED PERMIT DETERMINATION" for the Gulf Power Company's Smith Electric Generating Plant, located at 4300 County Road, Bay County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is <http://www.dep.state.fl.us/air>.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn. (Note: EPA provided comments on the Draft permit and has indicated that resolution of these comments should preclude an objection to the Proposed permit. This will enable the issuance of the Final permit prior to December 31, 1999.)

If you should have any questions, please contact Jonathan Holtom, P.E. at 850/921-9531.

Sincerely,


C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/h
Enclosures

copies furnished to:
Mr. James O. Vick, Gulf Power Company
Mr. Kennard Kosky, P.E., Golder Associates (E-mail Memorandum)
Mr. G. Dwain Waters, Gulf Power Company (E-mail Memorandum)
Ms. Gail Kamaras, Legal Environmental Assistance Foundation
Mr. Ed K. Middleswart, DEP, Northwest District Office (E-mail Memorandum)
Mr. Gregg Worley, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)
Ms. Elizabeth Bartlett, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 0050014-001-AV

I. Public Notice.

An "INTENT TO ISSUE REVISED TITLE V AIR OPERATION PERMIT" to Gulf Power Company for the Smith Electric Generating Plant, located at 4300 County Road, Bay County, was clerked on September 16, 1999. This revised DRAFT permit replaced the DRAFT permit that was issued on October 7, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE REVISED TITLE V AIR OPERATION PERMIT" was published in the Pensacola News Journal on September 20, 1999. The revised DRAFT Title V Air Operation Permit was available for public inspection at the Northwest District office in Pensacola and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on September 22, 1999.

II. Public Comment(s).

Comments were received from one respondent during the 30 (thirty)-day public comment period. The comments were not considered significant enough to reissue the revised DRAFT Title V Permit and require another Public Notice, therefore, the revised DRAFT Title V Operation Permit was changed. Listed below is each comment that was received and a corresponding response.

A. E-mail from Ms Elizabeth Bartlett, EPA Region 4, dated October 27, 1999.

1. Statement of Basis - The statement of basis contends that the Department and EPA have previously determined that sources without controls, whose emissions are less than half of the applicable standard, shall test annually. This statement is used as part of the justification for how the facility will address periodic monitoring for particulate matter in the permit. While the permit does adequately address periodic monitoring, the above mentioned statement should be removed from the permit because it is inaccurate. EPA has not made the general determination that sources without controls, whose emissions are less than half of the applicable standard, need only test annually to achieve adequate periodic monitoring for particulate matter. EPA's determination as to what constitutes adequate periodic monitoring will continue to be made on a case by case basis.

DEP Response 1:

Agreed. The statement in question has been deleted from the Statement of Basis.

2. Statement of Basis - The statement of basis indicates that periodic monitoring for particulate matter will be achieved through the use of COMs, where particulate matter stack tests will be required for any calendar quarter in which more than five percent of the COMs data show 20% or greater opacity. Please revise the statement of basis to provide a justification for choosing 20% opacity as the threshold at which particulate matter testing will be required.

DEP Response 2:

The 20% opacity benchmark was chosen by mutual agreement between DEP and EPA during a teleconference on September 10, 1999, since it is one-half of the opacity standard for these units. It was agreed to by Gulf Power since their typical operations are at much less than 20% opacity and because historical test results indicate PM emission rates much lower than the standard at operating levels near 20% opacity. The following sentence will be added to the periodic monitoring paragraph in the Statement of Basis:

“The 20% opacity benchmark was chosen as a reasonable level because it is one-half of the opacity standard and because past testing shows low PM emission rates at opacity levels near 20%.”

3. Section I. Subsection A - The facility description incorrectly describes the source as having “one combustion turbine (used to drive a single peaking generator).” This should be revised to be consistent with the statement of basis and section III.B which specify “two combustion turbines (used to drive two separate peaking generators) driven by a single jet engine.”

DEP Response 3:

Agreed. The requested change has been made.

4. Section II. Condition 13. - This condition should specifically reference the required components of Appendix TV-3, item 51, which lists the compliance certification requirements of 40 CFR 70.6(c)(5)(iii), to ensure that complete certification information is submitted to EPA. In addition, the telephone number for the Air Enforcement Section should be corrected to read (404)562-9155.

DEP Response 4:

This requirement is currently contained in condition A.8. of the Acid Rain section of the permit. Upon review of this section, it was discovered that condition A.5. is a duplicate of part of condition A.3., therefore, condition A.5. has been deleted and the remainder of the conditions have been renumbered.

5. Section III. Conditions A.11., A.12., A.13., B.7., B.8. - These conditions address the occurrence of excess emissions from the electric generating units. More specifically, excess emissions resulting from malfunctions are permitted provided that best operational practices to minimize emission are adhered to and the duration of excess emissions are minimized. EPA has recently addressed the issue of excess emissions in a September 20, 1999 policy memorandum from Steven A. Herman, Assistant Administrator for Enforcement and Compliance Assurance and Robert Perciasepe, Assistant Administrator for Air and Radiation. The September 20, 1999 memo reaffirms and supplements the EPA’s original policy regarding excess emissions during malfunction, startup, shutdown, and maintenance, which is contained in memoranda from Kathleen Bennett, formerly Assistant Administrator for Air, Noise and Radiation dated September 28, 1982 and February 15, 1983. Please ensure that the permit conditions which address excess emissions are consistent with EPA’s policy.

DEP Response 5:

The above referenced conditions are direct quotes of the Florida Administrative Code, which by definition, are applicable requirements for the Title V permit. Until the above referenced policy memo is promulgated into a federal rule and then adopted and incorporated into Florida’s SIP, the excess emissions conditions contained in this permit may not be changed. Because of this, no change can be made to these conditions as a result of this comment.

6. Section III. Condition A.3.b. - Condition A.3.b states that the sodium carbonate will be injected at a rate of 420 pounds as hour. Since this condition specifies the methods of operation for this source, the injection rate is an operational limit. In order for an operational limit to be enforceable as a practical matter there must be a method of establishing compliance with that limit. In this case the most appropriate method of establishing compliance is through record keeping. Therefore, we recommend that the permit require the source to keep records for the rate of sodium carbonate injection.

DEP Response 6:

As a result of this comment, it was determined that condition A.3.b. was not worded very clearly. The 420 pound per hour injection rate was intended to be for informational purposes only. There is no need to place an operational limit on something as innocuous as sodium carbonate, especially since the sole purpose of using it is to reduce particulate emissions from the ESP. Therefore, condition A.3.b. has been changed:

From:

- b. Other. Supplemental injection of “sodium carbonate” at a rate of 420 pounds per hour, as necessary to maintain visible emissions below the applicable standards.

To:

- b. Other. Supplemental injection of “sodium carbonate” (at a rate of up to 420 pounds per hour) as necessary to maintain visible emissions below the applicable standards.
7. Section III. Condition A.9 - This condition contains the sulfur dioxide emission limits for units 001 and 002. However, these limits do not take effect until April 1, 2000. Since the SIP requires emission limits for sulfur dioxide for fossil fuel fired steam generators, the permit must have emission limits in place for the time period between the issuance of the permit and April 1, 2000.

DEP Response 7:

The Department agrees. As a result of this comment, condition A.9. has been changed to the following:

A.9.a. Sulfur Dioxide. From the effective date of this permit until March 31, 2000, sulfur dioxide emissions shall not exceed 5.50 lbs/MMBtu, as measured by applicable compliance methods.
[Rule 62-213.440, F.A.C.; and, applicant request.]

A.9.b. Sulfur Dioxide. Starting April 1, 2000, sulfur dioxide emissions shall not exceed the following emissions limitations, as measured by applicable compliance methods:

<u>Unit No.</u>	<u>Emissions Limit</u>
-001, alone	2.10 lbs/MMBtu
-002, alone	2.70 lbs/MMBtu
-001 & -002, combined	4.50 lbs/MMBtu

[Rules 62-204.220(1) & 62-204.240(1), F.A.C.; and, applicant request.]

8. Section III. Condition A.17 - Condition A.3.b states that the supplemental injection of sodium carbonate will be used to maintain visible emissions below the applicable standards. Additionally, condition A.17 requires that all emissions tests be performed while injecting additives consistent with normal operating practices. However, since the sodium carbonate additive will be used to decrease visible emissions, testing while the additive is being injected will most likely not represent the operating conditions at which the highest emissions occur. The worst case conditions will most likely occur just prior to when the additive is needed.

Periodic testing of the source is required in order to evaluate the source’s continual compliance status with regard to the emission limits. Testing should therefore be performed while the emission unit is operating in a manner that is representative of the unit’s overall operation throughout the period of time since the last emission test. Region 4 was informed by FDEP that the facility has not previously used this method of sodium carbonate injection for control of emissions, and therefore, the facility does not know

what percentage of the time the supplemental injection of sodium carbonate will be necessary. Therefore, in order to assure that testing is performed during representative emission unit operation, Region 4 agrees that the following language should be included in the permit:

- A.17. Testing While Injecting Additives. If supplemental additives are used greater than 50% of the time that the unit(s) are operated, the owner or operator shall conduct all emissions tests while injecting additives, consistent with normal operating practices approved by the Department.
[Rule 62-213.440, F.A.C.]

DEP Response 8:

The Department agrees. Condition A.17. has been changed as suggested.

9. Section III. Conditions A.20 and A.30(b) - Condition A.20 states during the particulate matter emission test, there must be a minimum sample volume of 30 dry standard cubic feet. Condition A.30(b) states the minimum sample volume will be 25 dry standard cubic feet, unless otherwise specified. In order to clarify which condition is applicable, we recommend adding a permitting note to Condition A.30(b) to cross-reference the more stringent requirements of A.20.

DEP Response 9:

The Department agrees. The following permitting note will be added following condition A.30(b):

{Permitting Note: Specific Condition B.21. specifies a minimum sample volume of 30 dry standard cubic feet.}

10. Section III. Condition A.36(b) - Please clarify whether the used oil generated by Gulf Power is generated on-site at the Lansing Smith Plant, or off-site at other Gulf Power plants. Inclusion of this information may help inspectors in identify the type of records maintained to document compliance with PCB generator/marketer requirements. In addition, this condition should reference boilers 001 and 002, not 004 and 005.

DEP Response 10:

All three of the Gulf Power plants are only allowed to burn used oil that is generated by Gulf Power. Because all three are allowed to burn used oil that they generate, there is no need to transport used oil from other plants. Also, the Department believes that, since Gulf Power is only allowed to burn used oil that they generate and are not allowed to purchase used oil from a vendor, they do not meet the definition of a used oil marketer. This condition was purposefully written this way to allow Gulf Power to dispose of used oil from transformers, as well as that generated on-site. As a result, no changes to this condition have been made.

11. Section III. Condition A.38 - Please revise this condition to include the underlined language as follows:
“The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions and, where practicable, shall be performed while operating at conditions representative of those showing greater than 20% opacity.”

DEP Response 11:

The Department agrees. The requested language has been added to condition A.38.

12. Section III. Condition B.18 - This condition requires that periodic monitoring for visible emissions from the combustion turbines consist of performing a Method 9 test when the units operate for more than 400

hours in any calendar year, and additionally for every 150 hours of operation thereafter. Since the combustion turbines are used to drive peaking generators, the hours of operation will be limited. Potentially, several months or even years could pass between triggering a Method 9 performance test. Therefore, in order to provide a more adequate form of periodic monitoring and a basis for annual compliance certifications, we recommend that a qualitative observation of opacity be performed and recorded on a regular basis (e.g. weekly while operating), until the initial 400 hours has been reached. The qualitative observations shall take place while the combustion turbines are in operation. The records of these observations should indicate whether or not any abnormal visible emissions are detected and include color, duration, and density of the plume, as well as the cause and corrective action taken for any abnormal visible emissions. If an abnormal visible emission is detected, a Method 9 survey would be conducted.

DEP Response 12:

The average operation of these turbines is about 100 hours per year. By rule, a visible emissions test is required only after the unit has operated more than 400 hours on fuel oil in any given federal fiscal year. For periodic monitoring purposes, an additional test is required after every additional 150 hours in the same year. If the Department ever feels that the opacity standard is being exceeded, a special compliance test can be required (see condition A.15.). For such low historical levels of operation, the Department feels that any additional periodic monitoring beyond what is already required would be unnecessary. No changes have been made as a result of this comment.

13. Appendix CP-1. Section IV. Condition A.2. - The regulatory citation for the applicable NO_x emission limit should refer to 40 CFR 76.7 rather than 40 CFR 76.5(a)(1).

DEP Response 13:

Agreed. The change has been made.

B. Documents on file with the permitting authority:

-E-mail memo received October 27, 1999, from Ms. Elizabeth Bartlett.

III. Conclusion.

The enclosed PROPOSED Title V Air Operation Permit includes the aforementioned changes to the revised DRAFT Title V Air Operation Permit.

The permitting authority will issue the PROPOSED Permit No.: 0330045-001-AV, with the changes noted above.



Jeb Bush
Governor

Jonathan Holtom

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

September 16, 1999

Mr. Robert G. Moore
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0100

Re: Revised DRAFT Title V Permit No.: 0050014-001-AV
Lansing Smith Electric Generating Plant

Dear Mr. Moore:

One copy of the Revised DRAFT Title V Air Operation Permit for the Lansing Smith Electric Generating Plant located at 4300 County Road, Bay County, is enclosed. The previous DRAFT Title V Operation Permit dated October 7, 1997, is withdrawn. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" is also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" must be published as soon as possible. This issue is important in order for you to receive your revised Title IV Acid Rain permit by January 1, 2000, for the inclusion of the Phase I/II NO_x limitations pursuant to Rule 62-214.360(6), Florida Administrative Code. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak, P.E., at the above letterhead address. If you have any other questions, please contact Jonathan Holtom, P.E. at 850/921-9531.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/h

Enclosures

cc: Mr. Gregg Worley, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)
Ms. Elizabeth Bartlett, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

In the Matter of an
Application for Permit by:

Gulf Power Company
One Energy Place
Pensacola, FL 32520-0100

Revised DRAFT Permit No.: 0050014-001-AV
Lansing Smith Electric Generating Plant
Bay County

INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of revised DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Gulf Power Company, applied on June 14, 1996, to the permitting authority for a Title V air operation permit for the Lansing Smith Electric Generating Plant located at 4300 County Road, Bay County. The applicant submitted the Phase I/II NO_x Acid Rain Compliance Plan on December 22, 1997. This permit incorporates the Phase I/II NO_x standards into the Title IV Acid Rain Part pursuant to Rule 62-214.360(6), Florida Administrative Code (F.A.C.).

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." The 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. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-1344; Fax: 850/922-6979), within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106, F.A.C.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the attached Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

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 (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, 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 fourteen 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 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 how and when each petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action 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 notice of intent. 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 will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

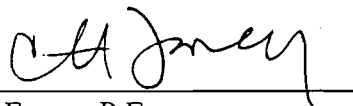
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) and all copies were sent by certified mail before the close of business on 9/17/99, to the person(s) listed:

Mr. Robert G. Moore, Gulf Power Company
Ms. Gail Kamaras, Legal Environmental Assistance Foundation

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the DRAFT permit) were sent by U.S. mail on the same date to the person(s) listed:

Mr. Kennard Kosky, P.E., Golder Associates
Mr. G. Dwain Waters, Gulf Power Company
Mr. Ed K. Middleswart, P.E., DEP, Northwest District Office

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.

Barbara J. Pantwell 9/17/99
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V Revised DRAFT Permit No.: 0050014-001-AV
Lansing Smith Electric Generating Plant
Bay County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Gulf Power Company for the Lansing Smith Electric Generating Plant located at 4300 County Road, Bay County. This permit incorporates the Phase I/II NO_x standards into the Title IV Acid Rain Part pursuant to Rule 62-214.360(6), Florida Administrative Code (F.A.C.). The applicant's name and address are: Gulf Power Company, One Energy Place, Pensacola, Florida 32520.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

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 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, 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 fourteen 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 applicable 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code (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; 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 petitioner's substantial rights will be affected by the agency determination;

(c) A statement of how and when the petitioner received notice of the agency action or proposed action;

(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, as well as the rules and statutes which entitle petitioner to relief; and

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action 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 notice of intent. 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 is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

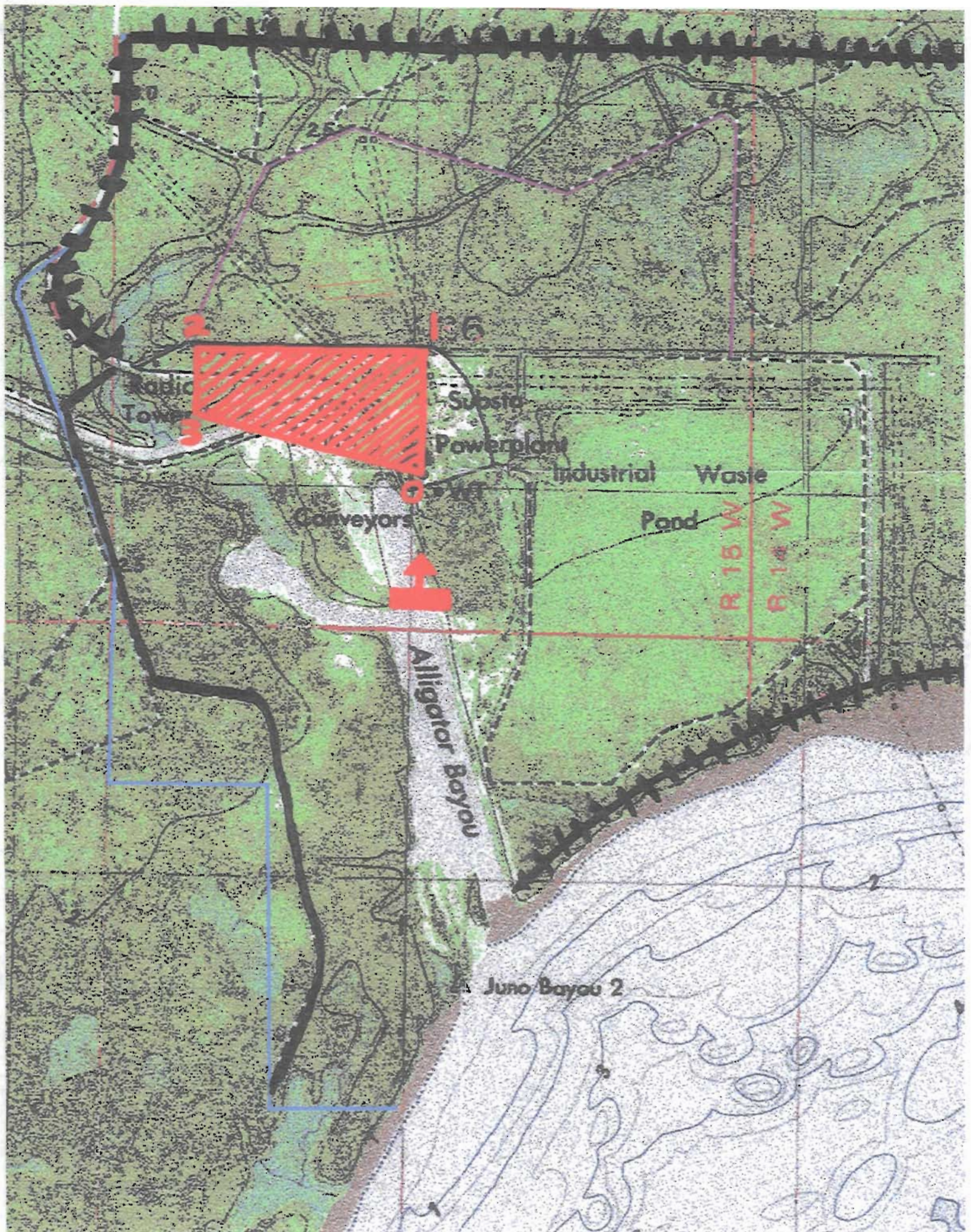
Permitting Authority:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Affected District/Local Program:

Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8300
Fax: 850/595-4417

The complete project file includes the revised DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.



Appendix H-1, Permit History/ID Number Changes

(For Tracking Purposes Only)

Gulf Power Company
Lansing Smith Plant

Permit No.: 0050014-001-AV
Facility ID No.: 0050014

E.U.								
<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>	<u>MW Output</u>	<u>Heat Input (MMBtu/hr)</u>
-001	Lansing Smith #1 - Stack	AO03-211310	04/17/92	04/01/97			175	(1,768) ^{1,2}
		AO03-134885	07/09/87	06/01/92			175	(1,768) ^{1,2}
		AO03-56886	07/15/82	07/01/87			175	(1,566) ^{1,3}
		Secretarial ORDER ⁴	10/18/85					
		Secretarial ORDER ⁵	12/07/82					
		AO03-2031	08/17/77	08/17/82			N/S	1,556
		AC03-2023	02/10/75	01/01/77	05/15/77		N/S	1,229
-002	Lansing Smith #2 - Stack	AO-3-1133	01/29/73	12/15/74			130	1,300
		AO03-211310	04/17/92	04/01/97			205	(2,042) ^{1,2}
		AO03-134887	07/09/87	06/01/92			205	(2,042) ^{1,2}
		AO03-56888	07/15/82	07/01/87			205	(1,974) ^{1,3}
		Secretarial ORDER ⁴	10/18/85					
		Secretarial ORDER ⁵	12/07/82					
		AO03-7636	03/22/78	03/22/83			N/S	1,924
AC03-2024	02/10/75	01/01/77	05/15/77		N/S	1,404		
AO-3-1132	01/29/73	12/15/74			140.75	1,406		
-003	Peaking Turbines	AO03-249657	05/19/94	01/15/96				

ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 10PCY030014

To: **Facility ID No.:** 0050014

¹ Number in parenthesis indicates number reported in application, not specified in the permit.

² "Maximum allowable heat input is that heat input necessary to maintain electrical load output at 110% of the level at which the most recent successful particulate matter compliance test was conducted."

³ "Maximum allowable heat input is that heat input necessary to maintain electrical load output at the level at which the most recent successful quarterly particulate matter test was conducted."

⁴ Secretarial ORDER issued to relax semi-annual PM testing requirement to annual.

⁵ Secretarial ORDER issued to relax quarterly PM testing requirement to semi-annual.

Gulf Power, Lansing Smith Plant

Facility ID #: 0050014

Permit History

This facility consists of two coal fired boilers (Units 1 & 2) and one combustion turbine. Units 1 & 2 were originally permitted through an operation permit in 1973. The capacities that were listed in the application and incorporated into the permit were 130 MW & 1300 MMBtu/hr for Unit 1 and 140.75 MW & 1,406 MMBtu/hr for Unit 2. The electrostatic precipitators that were included with the original design were unable to meet the PM limit. Because of this, AC permits were issued in 1975 to install two additional EPs in order to meet the PM limit. The permits did not specifically limit the capacities, but did incorporate the application data as enforceable conditions of the permit. The applications listed the capacities as 1,229 & 1,404 MMBtu/hr for Units 1 & 2, respectively. The electrical output was not mentioned in either the application or the permits.

Operation permits were issued following construction for Unit 1 in 1977 and for Unit 2 in 1978. The AO for Unit 1 limited heat input to 1,556 MMBtu/hr, the electrical output was not mentioned. The AO for Unit 2 limited heat input to 1,924 MMBtu/hr, the electrical output was not mentioned.

Renewal operating permits were issued in 1982 for Units 1 & 2, with the application for renewal listing the capacities as 1,556 and 1,974 MMBtu/hr, respectively. The electrical outputs were mentioned in the facility descriptions as 175 & 205 MW, respectively.

Renewal operating permits were issued in 1987 and 1992 for Units 1 & 2, with the application for renewal listing the capacities as 1,768 and 2,024 MMBtu/hr, respectively. The electrical outputs were mentioned in the permits as 175 & 205 MW, respectively. The permit states that the "Maximum allowable heat input is that heat input necessary to maintain electrical load output at 110% of the level at which the most recent successful particulate matter compliance test was conducted."

For compliance with the Title V requirements, the Title V DRAFT permit will be issued with the capacities listed at the levels allowed by the construction permits that were issued in 1975.

GULF POWER COMPANY

Plant	Unit No.	Primary Fuel	SO ₂ (lb/MMBtu)	AC Permit No.	Issue Date	Exp. Date	Heat Input Limit	Requested Rates	Stack Height	Exit Dia.	Exit Temp.	Flow Rate (acfm)	FPS	Year Built	
Smith	Boiler 1	Coal	6.17	AC03-2023	2/10/75		1,229	1,768	199 ft.	18 ft.	260 °F	984,400	64.5	5/12/65	
				AO03-2031	8/17/77		1,556				1,556				
	Boiler 2	Coal	6.17	AC03-2024	2/10/75		1,404	2,042	"	"	"	"	"	4/9/67	
				AO03-7636	3/22/78		1,924								
	CT	#2	0.5% S	N/A	N/A		542	542	33 ft.	13.7	1200 °F	1,069,740	120.9	5/18/71	
				AO03-24090	11/16/79	11/1/84	542								
				AO03-2015	12/20/74	12/20/79	429.7								
Scholz	Boiler 1	Coal	6.17	AC32-2004	1/10/74		340.2	587	150 ft	13.5 ft.	330 °F	346,900	40.4	2/24/53	
				AO32-4625	12/14/77	12/14/82	546								
	Boiler 2	Coal	6.17	AC32-2005	1/10/74		344.3	587	"	"	"	"	"	10/26/53	
				AO32-4624	12/14/77	12/14/82	546								
Crist	Boiler 1	Nat. Gas	2.75	N/A	N/A		320	320	450 ft.	18 ft.	290 °F	802,500	52.6	1/1/45	
				AO17-2073	1/8/75	1/8/80	249								
	Boiler 2	Nat. Gas	2.75	N/A	N/A		320	320	"	"	"	"	"	6/1/49	
				AO17-2074	1/8/75	1/8/80	232								
	Boiler 3	Nat. Gas	2.75	N/A	N/A		550	550	"	"	"	"	"	9/1/52	
				AO17-2075	1/8/75	1/8/80	310								
	Boiler 4	Coal	5.9	AC17-2126	10/15/75		491	977	"	"	"	"	"	7/1/59	
			AO17-2185	8/30/77		1,025									
Boiler 5	Coal	5.9	AC17-2127	10/15/75		422	977	"	"	"	"	"	6/1/61		
			AO17-2186	9/15/77		926									
Boiler 6	Coal	5.9	AC17-234016	10/7/93	***	3,368	3,368	450	23.2 ft.	320 °F	2,462,700	97.1	5/1/70		
			AO17-4623	12/23/77		3,219									
Boiler 7	Coal	5.9	N/A	N/A		5,824	5,824	"	"	"	"	"	8/1/73		
				AO17-4622	12/23/77		4854 *								

* Filed petition on 1/14/80, claiming that imposed heat limit was calc'ed by DEP inappropriatly.

** PM Limit for all = 0.1 lb/MMBtu.

*** AC17-234016 further limited PM and SO₂ to 1,475 and 87,035 tpy, respectively.

Radial ~~Dist~~ From Unit 1-2 Stack Center
Dist Due North is 0'

290°, 840 follow access road to
1 (WNW)

~~320°, 11~~ to northern property boundary

(approximately 320°, 1200m). Follow
NW

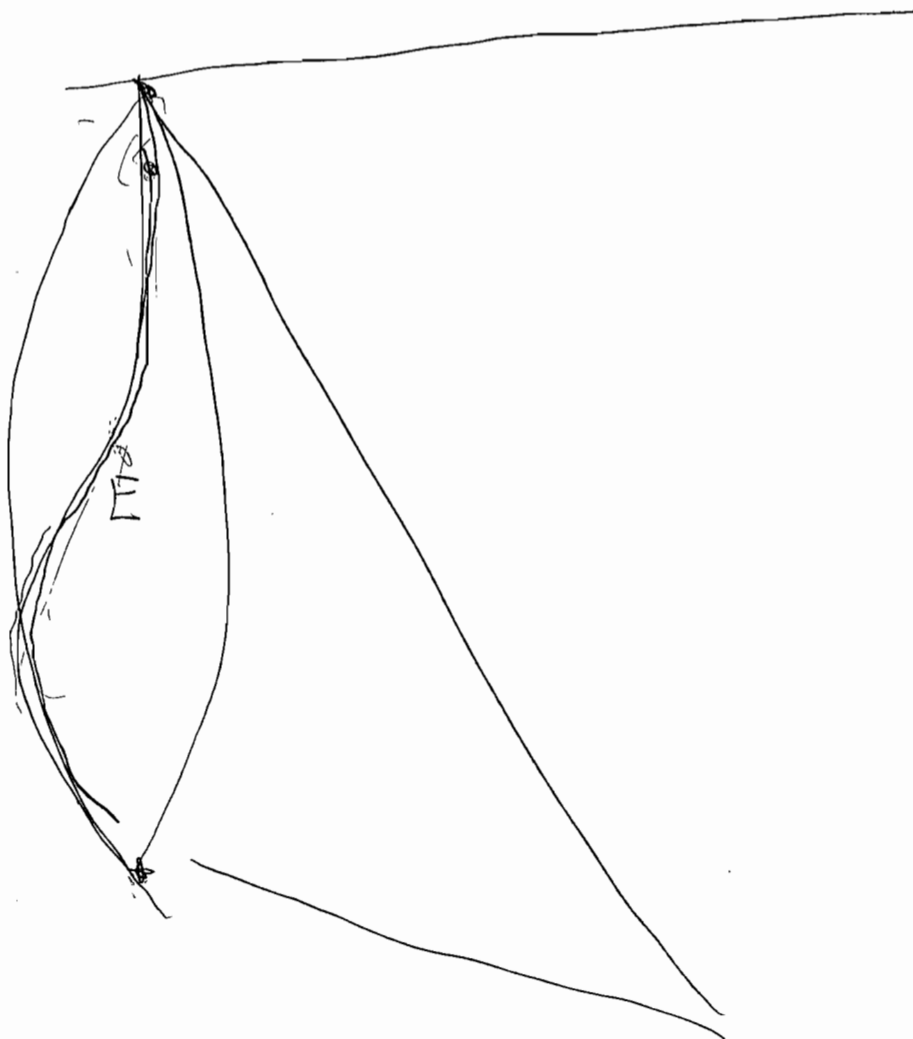
property boundary Eastward 1500m (approximately

36°, 1230) then ~~left~~ turn due south

and ~~left~~ fence ^{due south} to the Ash Pond fence and

connect with the ash Pond fence

(070°, 750m)





Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

P.E. Certification Statement

Permittee:
Gulf Power Company
Smith Plant

DRAFT Permit No.: 0050014-001-AV
Facility ID No.: 0050014

Project type: Initial Title V Air Operation Permit

I HEREBY CERTIFY that the 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, and geological features).

Scott M. Sheplak

Scott M. Sheplak, P.E.

Registration Number: 0048866

10/06/97

date

Permitting Authority:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-1344
Fax: 850/922-6979



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

October 6, 1997

Mr. G. Edison Holland, Jr.
Vice President Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520

Re: DRAFT Title V Permit No.: 0050014-001-AV
Lansing Smith Electric Generating Plant

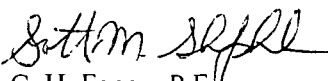
Dear Mr. Holland:

One copy of the DRAFT Title V Air Operation Permit for the Lansing Smith Electric Generating Plant located at 4300 County Road, Bay County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" must be published as soon as possible upon receipt of this letter. This issue is important in order for you to receive your Title IV Acid Rain permit by January 1, 1998, pursuant to the Clean Air Act and Section 403.0872, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak at the above letterhead address. If you have any other questions, please contact Jonathan Holtom at 850/488-1344.

Sincerely,

for 
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/h
Enclosures

cc: Ms. Carla E. Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)
Ms. Yolanda Adams, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

In the Matter of an
Application for Permit by:

Gulf Power Company
One Energy Place
Pensacola, Florida 32520

DRAFT Permit No.: 0050014-001-AV
Lansing Smith Electric Generating Plant
Bay County

INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Gulf Power Company, applied on June 14, 1996, to the permitting authority for a Title V air operation permit for the Lansing Smith Electric Generating Plant located at 4300 County Road, Bay County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required in order to commence or to continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." The 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. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 904/488-1344; Fax: 904/922-6979), within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the enclosed Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

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 (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. A petitioner must 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 (or a request for mediation, as discussed below) 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;

(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

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 notice of intent. 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.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.


Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental

Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 401 M. Street, SW, Washington, D.C. 20460.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

for 
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) and all copies were sent by certified mail before the close of business on 10/8/97 to the person(s) listed:

Mr. G.Edison Holland, Jr., Gulf Power Company

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) were sent by U.S. mail on the same date to the person(s) listed:

Mr. Kennard Kosky, P.E., Golder Associates
Mr. G. Dwain Waters, Gulf Power Company
Mr. Ed K. Middleswart, DEP, Northwest District Office
Mr. Gary Shaffer, DEP, Northwest District Branch Office

Clerk Stamp

FILED 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.

Barbara J. Boutwell 10/8/97
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V DRAFT Permit No.: 0050014-001-AV
Lansing Smith Electric Generating Plant
Bay County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Gulf Power Company for the Lansing Smith Electric Generating Plant located at 4300 County Road, Bay County. The applicant's name and address are: Gulf Power Company, One Energy Place, Pensacola, Florida 32520.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

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 (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must 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 (or a request for mediation, as discussed below) within the applicable 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;

- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

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 notice of intent. 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.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 410 M. Street, SW, Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-1344
Fax: 850/922-6979

Affected District/Local Program:

Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/444-8300
Fax: 850/444-8417

Department of Environmental Protection
Northwest District Branch Office
2353 Jenks Avenue
Panama City, Florida 32405
Telephone: 850/872-4375
Fax: 850/872-7790

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/488-1344, for additional information.

Gulf Power Company
Lansing Smith Electric Generating Plant
Facility ID No.: 0050014
Bay County

Initial Title V Air Operation Permit
DRAFT Permit No.: 0050014-001-AV

Permitting Authority

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344
Fax: 850/922-6979

Initial Title V Air Operation Permit

DRAFT Permit No.: 0050014-001-AV

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Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

Permittee:

Gulf Power Company
500 Bay Front Parkway
Pensacola, Florida 32520-0100

DRAFT Permit No.: 0050014-001-AV

Facility ID No.: 0050014

SIC Nos.: 49, 4911

Project: Initial Title V Air Operation Permit

This permit is for the operation of the Lansing Smith Electric Generating Plant. This facility is located at 4300 County Road, Bay County; UTM Coordinates: Zone 16, 625.03 km East and 3349.08 km North; Latitude: 30° 16' 08" North and Longitude: 85° 42' 01" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix E-1, List of Exempt Emissions Units and/or Activities
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Phase II Acid Rain Permit Application/Compliance Plan Received December 8, 1995
Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)
Appendix TV-1, Title V Conditions (version dated 8/11/97)

Effective Date: January 1, 1998

Renewal Application Due Date: July 5, 2002

Expiration Date: December 31, 2002

Howard L. Rhodes, Director,
Division of Air Resources Management

HLR/sms/jh

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of two coal fired steam generators (boilers) and one combustion turbine (used to drive a single peaking generator). The two boilers are Acid Rain Phase II 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. Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

The use of 'Permitting Notes' throughout this permit are for informational purposes, only, and are not permit conditions.

Subsection B. Summary of Emissions Unit ID Numbers and Brief Descriptions.

<u>E.U. ID</u>	
<u>No.</u>	<u>Brief Description</u>
-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)
-003	Combustion Turbine - 542 MMBtu/hour Peaking Unit
-aaa	Material Handling of Coal and Ash (See Appendix U-1)
-bbb	Fugitive PM Sources - On-site Vehicles (See Appendix U-1)
-ccc	General Purpose Internal Combustion Engines (See Appendix U-1)

Please reference the Permit Number, the Facility Identification Number, and the appropriate Emissions Unit(s) ID Number(s) on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The following documents are part of this permit:

- Appendix E-1, List of Exempt Emissions Units and/or Activities
- Appendix U-1, List of Unregulated Emissions Units and/or Activities
- Phase II Acid Rain Permit Application/Compliance Plan Received December 8, 1995
- Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)
- Appendix TV-1, Title V Conditions (version dated 8/11/97)

{Permitting Note: The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.}

These documents are provided to the permittee for information purposes only:

Appendix H-1, Permit History / ID Number Transfers

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers (version dated 2/5/97)

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendix TV-1, Title V Conditions, is a part of this permit.
{Permitting note: Appendix TV-1, Title V Conditions is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}
2. **Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited.** The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. **Prevention of Accidental Releases (Section 112(r) of CAA).** If required by 40 CFR 68 the permittee shall submit to the implementing agency:
 - a) a risk management plan (RMP) when, and if, such requirement becomes applicable, and
 - b) certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
4. **Exempt Emissions Units and/or Activities.** Appendix E-1, List of Exempt Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
5. **Unregulated Emissions Units and/or Activities.** Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]
6. **General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions.** The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
{Permitting Note: No vapor emission control devices or systems are deemed necessary nor ordered by the Department as of the issuance date of this permit.}
[Rule 62-296.320(1)(a), F.A.C.]
7. **General Particulate Emission Limiting Standards. General Visible Emissions Standard.** Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere, the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

8. Not federally enforceable. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a) Grassing over each section of the ash landfill as it reaches its capacity.
- b) Regular packing of the coal pile to reduce blowing dust and aid in the prevention of coal fires.
- c) Application of a dust suppressant to the coal on the conveyor belts as necessary.

[Rules 62-296.320(4)(c)2., F.A.C.; and, Proposed by applicant in initial Title V permit application received June 14, 1996]

9. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

10. The Department's Northwest District Branch Office (Panama City) telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 872-4375, day or night, and for emergencies involving a significant threat to human health or the environment is (850) 413-9911. The Department's Northwest District Office (Pensacola) telephone number for routine business, including compliance test notifications, is (850) 444-8364 during normal working hours.

11. The permittee shall submit all compliance related notifications and reports required of this permit (other than Acid Rain Program Information) to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/444-8364
Fax: 850/444-8417

Acid Rain Program Information shall be submitted, as necessary, to:

Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400
Telephone: 850/488-6140
Fax: 850/922-6979

12. Any reports, data, notifications, certifications, and requests (other than Acid Rain Program Information) required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency, Region 4
Air, Pesticides & Toxics Management Division
Operating Permits Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9099
Fax: 404/562-9095

Acid Rain Program Information should be sent to:

United States Environmental Protection Agency, Region 4
Air, Pesticides & Toxics Management Division
Acid Rain Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9102
Fax: 404/562-9095

13. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition No. 51., Appendix TV-1, Title V Conditions.}
[Rule 62-214.420(11), F.A.C.]

Miscellaneous Conditions

14. Ambient Air Quality Standards Assurance. As a result of modeling against the SO₂ Ambient Air Quality Standards established in Rule 62-204.240(1), F.A.C., a boundary restricting fence shall be installed prior to the effective date of this permit in the following locations:

Begin fencing¹ at a point located approximately 290° and 840 meters from the origin^{2,3} (approximate location of gate across company access road). Follow along the East side of the access road to the Northern property boundary (approximately 320° and 1200 meters from the origin). Continue fencing along the Northern property boundary Eastward for a distance of 1500 meters (approximately 36° and 1230 meters from the origin). Turn due South and continue fencing to the ash pond (approximately 70° and 750 meters from the origin).

¹ Fencing shall be of sufficient height and strength so as to preclude public access.

² Point of origin: center of the common stack for Units 1 and 2.

³ Set due North from the center of the stack as 0°.

[Rules 62-204.220(1) & 62-204.240(1), F.A.C.]

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Section III. Emissions Units and Conditions.

Subsection A. This section addresses the following emissions units.

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-001	Boiler Number 1 (Phase II Acid Rain Unit)
-002	Boiler Number 2 (Phase II Acid Rain Unit)

Emissions unit number -001 is a tangentially fired, dry bottom boiler designated as “Boiler Number 1”. It is rated at a maximum heat input of 1,944.8 million Btu per hour (MMBtu/hour) when firing pulverized coal or distillate fuel oil. Emissions unit number -002 is a tangentially fired, dry bottom boiler designated as “Boiler Number 2”. It is rated at a maximum heat input of 2,246.2 million Btu per hour (MMBtu/hour) when firing pulverized coal or distillate fuel oil. Both units are Phase II Acid Rain Units.

{Permitting notes: These emissions units are regulated under Acid Rain, Phase II. These emissions units pre-date PSD regulations, but are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Fired Steam Generators with more than 250 million Btu per Hour Heat Input. PM emissions from unit -001 are controlled by a hot side (Buell Model # BAL 2X34N333-4-3P) and a cold side (General Electric Model # BE1.2X21(12)30-1.5-1.5-4.2P) electrostatic precipitator. PM emissions from unit -002 are controlled by a hot side (Buell Model # BAL 2X34N333-4-3P) and a cold side (GE-ESI Model # BE2.1X(2-12’s)(12)-30-111-4.3P) electrostatic precipitator. Unit -001 began commercial operation on May 12, 1965. Unit -002 began commercial operation on April 9, 1967. Units -001 and -002 share a common stack. Stack height = 199 feet, exit diameter = 18.0 feet, exit temperature = 260 °F, actual volumetric flow rate = 984,400 acfm.}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
-001	1,944.8	Coal
	153	No. 2 Fuel Oil
	153	On-Specification Used Oil
-002	2,246.2	Coal
	76	No. 2 Fuel Oil
	76	On-Specification Used Oil

[Rules 62-4.160(2), 62-210.200(PTE) & 62-296.405, F.A.C.; permits AC03-2023 & AC03-2024; and, Applicant’s request in initial Title V permit application received June 14, 1996.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **A.28.**
[Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation - Fuels. The fuels that are allowed to be burned in these boilers are coal and/or new No. 2 fuel oil and/or on-specification used oil (see specific condition **A.36.**). Fuel oil is only used for periods of start-up and as needed for flame stabilization. Also, on-site generated "oil contaminated soil" is periodically combusted for energy recovery purposes.
[Rule 62-213.410, F.A.C.; and, Applicant's request in initial Title V permit application dated June 14, 1996.]

A.4. Hours of Operation. These emissions units may operate continuously, i.e. 8760 hours/year. For each emissions unit, the permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation, including a detailed account of the hours operated on each of the allowable fuels.
[Rules 62-213.440 & 62-210.200(PTE), F.A.C.; and, Applicant's request in initial Title V application received June 14, 1996.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. Visible Emissions. Visible emissions shall not exceed 40 percent opacity. Because units 1 and 2 share a common stack, visible emissions violations from the stack will be attributed to both units unless opacity meter results show the specific unit causing the violation.
[Rule 62-296.405(1)(a), F.A.C.; and, Secretarial ORDER(s) signed October 18, 1985, and December 1, 1982; and, AO03-211310, Specific Condition 10.]

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6)-minute periods, during the 3-hour period of excess emissions allowed for boiler cleaning and load changes, at units which have installed continuous opacity monitors.

[Rule 62-210.700(3), F.A.C.]

A.7. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.
[Rule 62-296.405(1)(b), F.A.C.]

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

[Rule 62-210.700(3), F.A.C.]

A.9. Sulfur Dioxide. Sulfur dioxide emissions shall not exceed 4.40 pounds per million Btu heat input, as measured by applicable compliance methods.

[Rules 62-204.220(1) & 62-204.240(1), F.A.C.]

A.10. Sulfur Dioxide - Sulfur Content. The No. 2 fuel oil sulfur content shall not exceed 0.5 percent, by weight, as measured by applicable test methods.

[Applicant request in initial Title V permit application received June 14, 1996.]

Excess Emissions

A.11. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

A.12. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.]

A.13. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

{Permitting Note: In accordance with the Acid Rain Phase II requirements, the following continuous monitors are installed on these units: SO₂, NO_x, CO₂ and stack gas flow.}

A.14. Continuous Monitors. These emissions units shall have installed, and shall maintain, continuous monitoring systems for monitoring opacity and CO₂.

[Rule 62-405(1)(f)1., F.A.C.]

A.15. Sulfur Dioxide. Those emissions units not having an operating flue gas desulfurization device may monitor sulfur dioxide emissions by fuel sampling and analysis according to methods approved by the EPA. **The permittee elected to satisfy the monitoring requirements using SO₂ continuous emissions monitors. In addition, compliance with the liquid fuel sulfur limit will be verified by a fuel analysis provided by the vendor upon each fuel delivery (see specific condition A.24.).**

[Rule 62-296.405(1)(f)1.b., F.A.C.]

A.16. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standards of the Department (Specific Condition A.9.). A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is interrupted, the permittee shall immediately initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emissions standard. As-fired fuel sampling shall continue until such time as valid data capture is restored. In lieu of as-fired fuel sampling, the permittee may elect to demonstrate SO₂ emissions compliance by the temporary use of a spare SO₂ emissions monitor. The spare, previously calibrated, SO₂ emissions monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

Maintain a quality control (QC) program. At a minimum, the QC program must include written procedures which shall describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. Calibration Drift (CD) determination and adjustment of CEMS.
3. Preventative maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling-and analysis methods.
6. Program of corrective action for malfunctioning CEMS.

[Rules 62-213.440, 62-204.800(7)(e)5., and 62-296.405(1)(f)1.b., F.A.C.; and, AO03-211310.]

A.17. 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.]

Required Tests, Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.18. Annual Tests Required. Units -001 and -002 must be tested annually for SO₂ and PM emissions in accordance with the requirements listed below.

A.19. Visible Emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. **The Permittee has elected to utilize a transmissometer (opacity meter) for demonstrating compliance with the visible emissions limit.** As long as the transmissometer is calibrated, maintained, and operated in accordance with Performance Specification 1 of 40 CFR 60, Appendix B (see specific condition **A.23.**), the annual test for visible emissions is not required.
[Rules 62-213.440 and 62-296.405(1)(e)1., F.A.C.]

A.20. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
 - a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
 - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rules 62-297.310, and 62-297.401, F.A.C.]

A.21. Particulate Matter. The test methods for particulate matter emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-213.440, 62-296.405(1)(e)2., 62-297.310, and 62-297.401, F.A.C.]

A.22. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards.

[Rules 62-213.440, 62-296.405(1)(e)3., & 62-297.310, 62-297.401, F.A.C.; and, AO03-211310]

A.23. Continuous Monitor Performance Specifications. If continuous monitoring systems are required by rule or are elected by the permittee to be used for demonstrating compliance with the standards of the Department, they must be installed, maintained and calibrated in accordance with the EPA performance specifications listed below. These Performance Specifications are contained in 40 CFR 60, Appendix B, and are adopted by reference in Rule 62-204.800, F.A.C.

- (1) Performance Specification 1--Specifications and Test Procedures for Opacity Continuous Emission Monitoring Systems in Stationary Sources.
- (2) Performance Specification 2--Specifications and Test Procedures for SO₂ Continuous Emission Monitoring Systems in Stationary Sources.
- (3) Performance Specification 3--Specifications and Test Procedures for CO₂ Continuous Emission Monitoring Systems in Stationary Sources.

[Rule 62-297.520, F.A.C.]

A.24. The following fuel sampling and analysis protocol shall be used as an alternate sampling procedure authorized by permit to demonstrate compliance with the sulfur dioxide standard in the event that the SO₂ continuous emissions monitor is not able to capture valid data:

- a. Determine and record the as-fired fuel sulfur content, percent by weight, for liquid fuels using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition, to analyze a representative sample of the blended fuel following each fuel delivery. **Compliance with the liquid fuel sulfur limit established in specific condition A.10. shall be verified with a fuel analysis provided by the vendor upon each fuel oil delivery.**
- b. Determine and record the as-fired fuel sulfur content, percent by weight, for coal using ASTM D2013-72 and either ASTM D3177-75 or ASTM D4239-85, or the latest edition, to analyze a representative sample of the blended as-fired pulverized coal.
- c. Determine and record the density (using ASTM D 1298-80, or equivalent) and the calorific heat value in Btu per pound (using ASTM D 240-76, or the latest edition) of the fuel oil combusted.
- d. Determine and record the calorific heat value in Btu per pound of the blended, as-fired pulverized coal using ASTM D2013-72 and either ASTM D2015-77 or D3286-(latest version), or the latest edition.
- e. Record daily the amount of each fuel fired, the density of the fuel oil, the heating value of each fuel fired, and the percent sulfur content, by weight, of each fuel fired.
- f. Utilize the information in a., b., c., d. and e., above, to calculate the SO₂ emission rate to ensure compliance at all times.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

A.25. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;
 - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
 - c. Each NESHAP pollutant, if there is an applicable emission standard.
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.
9. 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.

(b) 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 may 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.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable

weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, SIP Approved.]

Compliance Test Requirements

A.26. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

A.27. 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 the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

A.28. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions 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.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

A.29. Applicable Test Procedures:

(a) Required Sampling Time.

1. 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.
2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
 - b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
 - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

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

TABLE 297.310-1
CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		Comparison check	5%

A.30. 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.]

Recordkeeping and Reporting Requirements

A.31. The owner or operator shall maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. These records must be of sufficient detail to determine compliance with the allowable sulfur dioxide emission limitations.

[Rules 62-213.440 & 62-4.070(3), F.A.C.]

A.32. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

A.33. Submit to the Department a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

A.34. A maintenance log of the continuous monitoring systems shall be kept showing:

- a. Time out of service.
- b. Calibration and adjustments.

[Rule 62-213.440, F.A.C.; and, AO03-211310, specific condition 8.]

A.35. Test Reports.

- (a) 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.
- (b) 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.

- (c) 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.
 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.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

Miscellaneous Conditions.

A.36. Used Oil. Burning of on-specification used oil is allowed in this emissions unit in accordance with all other conditions of this permit and the following conditions:

- a. **On-specification Used Oil Emissions Limitations:** This emissions unit is permitted to burn on-specification used oil, which contains a PCB concentration of less than 50 ppm. On-specification used oil is defined as used oil that meets the specifications of 40 CFR 279 - Standards for the Management of Used Oil, listed below. "Off-specification" used oil shall not be burned. Used oil which fails to comply with any of these specification levels is considered "off-specification" used oil.

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash point	100 degrees F minimum

- b. **Quantity Limitation:** This emissions unit is permitted to burn "on-specification" used oil that is generated by Gulf Power, not to exceed 50,000 gallons per calendar year in each boiler (1 & 2).
- c. **PCB Limitation:** Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement.
- d. **Operational Requirements:** On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.
- e. **Testing Requirements:** The owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs.

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

- f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
- (1) The gallons of on-specification used oil generated and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
 - (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
 - (3) Results of the analyses required above.
- [40 CFR 279.61 and 761.20(e)]
- g. Reporting Requirements: The owner or operator shall submit to the Northwest District office, within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

The owner or operator shall submit, with the Annual Operation Report form, the analytical results and the total amount of on-specification used oil burned during the previous calendar year.

[Rule 62-4.070(3) and 62-213.440, F.A.C., 40 CFR 279 and 40 CFR 761, unless otherwise noted.]

Subsection B. This section addresses the following emissions unit(s).

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-003	Combustion Turbines A & B

Emissions unit number -003 is two simple cycle combustion turbines manufactured by Pratt and Whitney that are used as a peaking units. It consists of a single engine used to drive two combustion turbines designated as turbine A & turbine B. Each combustion turbine is connected to a separate generator. The engine is rated at a maximum heat input of 542 million Btu per hour (MMBtu/hour) while being fueled by No. 2 fuel oil with a maximum sulfur content of 0.5%, by weight. Emissions from these combustion turbines are uncontrolled.

{Permitting notes: This emissions unit is regulated under Rule 62-210.300, F.A.C., Permits Required. These turbines are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. Each combustion turbine has its own stack. Stack heights = 33 feet, exit diameters = 13.7 feet, exit temperatures = 1,200 °F, actual volumetric flow rate (for both stacks) = 1,069,740 acfm. They began commercial operation on May 18, 1971.}

The following conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rates are as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
-003	542	No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **B.13.**
[Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation - Fuels. Only new No. 2 fuel oil shall be fired in this combustion turbine.
[Rule 62-213.410, F.A.C.]

B.4. Hours of Operation. This emissions unit may operate continuously, i.e. 8760 hours/year. The permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation.
[Rules 62-213.440 & 62-210.200(PTE), F.A.C.; and, applicant request in initial Title V application received June 14, 1996.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.5. Visible Emissions. Visible emissions from each turbine shall not be equal to or greater than 20 percent opacity.

[Rule 62-296.320(4)(b)1., F.A.C.; and, AO03-249657.]

B.6. Sulfur Dioxide - Sulfur Content. The sulfur content of the new No. 2 fuel oil shall not exceed 0.5 percent, by weight (see specific condition **B.12.**). The permittee shall maintain a log available for Department inspection of the fuel sulfur content.

[Rule 62-213.440, F.A.C.; AO03-249657; and, applicant request in initial Title V application received June 14, 1996.]

Excess Emissions

B.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

B.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

B.9. Sulfur Dioxide. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific conditions **B.6.** and **B.12.**

[Rule 62-213.440, F.A.C.]

B.10. 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.]

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.11. Visible emissions. The test method for visible emissions shall be EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C.

[Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

B.12. Sulfur Content. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or equivalent.

[Rules 62-213.440 and 62-297.440, F.A.C.]

B.13. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions 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.

[Rules 62-297.310(2) & (2)b., F.A.C.]

B.14. Applicable Test Procedures.

(a) Required Sampling Time.

2. Opacity Compliance Tests. When EPA Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2., F.A.C.]

B.15. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;
8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
9. 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.

(b) 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 may 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), F.A.C.; and, AO65-242827, Specific Condition #5 (frequency); and, SIP Approved.]

Recordkeeping and Reporting Requirements

B.16. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

B.17. Test Reports.

- (a) 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.
- (b) 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.

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

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Section IV. Acid Rain Part.

Operated by: Gulf power Company
ORIS Code: 643

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions units listed below are regulated under Acid Rain, Phase II.

E.U. ID

<u>No.</u>	<u>Description</u>
-001	Boiler Number 1 - 1,944.8 MMBtu/hour
-002	Boiler Number 2 - 2,246.2 MMBtu/hour

A.1. The Phase II permit application submitted for this facility, as approved by the Department, is a part of this permit (included as an Attachment). The owners and operators of these Phase II acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

a. DEP Form No. 62-210.900(1)(a), dated 07/01/95.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO₂) allowance allocations and nitrogen oxide (NO_x) requirements for each Acid Rain unit are as follows:

Description	Year	2000	2001	2002
ID No. 01 Boiler 1	SO₂ allowances, under Table 2 or 3 of 40 CFR 73	6,424*	6,424*	6,424*
ID No. 02 Boiler 2	SO₂ allowances, under Table 2 or 3 of 40 CFR 73	7,539*	7,539*	7,539*

*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.

**By January 1, 1999, this Part will be reopened to add NO_x requirements in accordance with the regulations implementing section 407 of the Clean Air Act.

A.3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program.

Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

1. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.
2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
3. Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c)1., 2. & 3., F.A.C.]

A.4. Comments, notes, and justifications: The Designated Representative has been changed from Frederick Kuester to G. Edison Holland, Jr.

Appendix E-1, List of Exempt Emissions Units and/or Activities.

Gulf Power Company
Lansing Smith Electric Generating Plant

DRAFT Permit No.: 0050014-001-AV
Facility ID No.: 0050014

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

	<u>State Registration Number</u>	<u>Contents</u>	<u>Size (Gallons)</u>
1.	Tank #1	#2 Diesel - Lighter Oil	25,000
2.	Tank #3	#2 Diesel - CT Fuel Oil	200,000
3.	Tank #4	#2 Diesel - CT Fuel Oil	200,000
4.	Tank #5	#2 Diesel - CT Fuel Oil	200,000
5.	Tank #6	Lube Oil	1,000
6.	Tank #7	Lube Oil	2,100
7.	Tank #8	Lube Oil	581
8.	Tank #9	Lube Oil	560
9.	Tank #10	Lube Oil	560
10.	Tank #11	Lube Oil	560
11.	Tank #12	Lube Oil	560
12.	Tank #13	Lube Oil	6,000
13.	Tank #14	Lube Oil	6,000
14.	Tank #15	Lube Oil	6,000
15.	Tank #16	Sulfuric Acid	4,000
16.	--	Maintenance Area, Used Oil	500
17.	--	Maintenance Area, Used Oil	500
18.	--	Used Oil	300
19.	--	Fire Pump Diesel Fuel (2)	--
20.	--	Chlorine (12)	--
21.	--	Used Oil	250
22.	--	Used Oil	500

Miscellaneous

23. Fire Safety Equipment - Exempted by Rule 62-210.300(3)(a)22., F.A.C.
24. Vacuum Pumps - Exempted by Rule 62-210.300(3)(a)9., F.A.C.
25. Laboratory Equipment - Exempted by Rule 62-210.300(3)(a)15., F.A.C.
26. Welding Equipment - Exempted by Rule 62-210.300(3)(a)16., F.A.C.
27. Gulf Power Company Generated Non-hazardous Boiler Chemical Cleaning Wastes
(Not to exceed 50 gallons per minute)

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Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Gulf Power Company
Lansing Smith Electric Generating Plant

DRAFT Permit No.: 0050014-001-AV
Facility ID No.: 0050014

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘exempt emissions units’.

E.U. ID

No. Brief Description of Emissions Units and/or Activity

- aaa Material Handling of Coal and Ash
- bbb Fugitive PM Sources - On-site Vehicles
- ccc General Purpose Internal Combustion Engines

- aaa Material Handling of Coal and Ash. Fugitive PM emissions generated from the transfer and handling of coal and ash. SCC: 3-05-101-03.

- bbb Fugitive PM Sources. Fugitive PM emissions generated by haul trucks and other on-site vehicles. SCC: 3-05-101-50.

- ccc General Purpose Internal Combustion Engines. located for use at this source are miscellaneous internal combustion engines used to operate the following: welders, compressors, generators, water pumps, sweepers, and other auxiliary equipment.

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Appendix H-1, Permit History/ID Number Changes

(For Tracking Purposes Only)

Gulf Power Company
Lansing Smith Electric Generating Plant

Permit No.: 0050014-001-AV
Facility ID No.: 0050014

<u>E.U.</u> <u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration</u> <u>Date</u>	<u>Extended</u> <u>Date</u>	<u>Revised</u> <u>Date(s)</u>
-001	Lansing Smith #1 - Stack	AO03-211310 Secretarial ORDER ¹ Secretarial ORDER ² AC03-2023	04/17/92 10/18/85 12/07/82 02/10/75	04/01/97	05/15/77	
-002	Lansing Smith #2 - Stack	AO03-211310 Secretarial ORDER ¹ Secretarial ORDER ² AC03-2024	04/17/92 10/18/85 12/07/82 02/10/75	04/01/97	05/15/77	
-003	Peaking Turbines A & B	AO03-249657	05/19/94	01/15/96		

ID Number Changes (for tracking purposes):

From: Facility ID No.: 10PCY030014

To: Facility ID No.: 0050014

¹ Secretarial ORDER issued to relax semi-annual PM testing requirement to annual.

² Secretarial ORDER issued to relax quarterly PM testing requirement to semi-annual.

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Referenced Attachments

Phase II Acid Rain Application/Compliance Plan

Appendix A-1, Abbreviations, Definitions, Citations, and Identification Numbers

Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)

Appendix TV-1, Title V Conditions(version dated 8/11/97)

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Compliance Requirements

Phase II Acid Rain Permit Application/Compliance Plan

Phase II Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission is: New Revised

STEP 1
Identify the source by plant name, State, and ORIS code from NADB

Lansing Smith <small>Plant Name</small>	FL <small>State</small>	643 <small>ORIS Code</small>
--	----------------------------	---------------------------------

STEP 2
Enter the boiler ID# from NADB for each affected unit, and indicate whether a repowering plan is being submitted for the unit by entering "yes" or "no" at column c. For new units, enter the requested information in columns d and e

Compliance Plan				
a Boiler ID#	b Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	c Repowering Plan	d New Units Commence Operation Date	e New Units Monitor Certification Deadline
1	Yes	No		
2	Yes	No		
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			

STEP 3
Check the box if the response in column c of Step 2 is "Yes" for any unit

For each unit that will be repowered, the Repowering Extension Plan form is included and the Repowering Technology Petition form has been submitted or will be submitted by June 1, 1997.

Plant Name (from Step 1)

STEP 4

Read the standard requirements and certification, enter the name of the designated representative, and sign and date

Standard RequirementsPermit Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72, Rules 62-214.320 and 330, F.A.C. in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the permitting authority; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(i) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

Plant Name (from Step 1)

Recordkeeping and Reporting Requirements (cont.)

(iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.

(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.

(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.

(4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.

(5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.

(6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

(7) Each violation of a provision of 40 CFR parts 72, 73, 75, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities. No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;

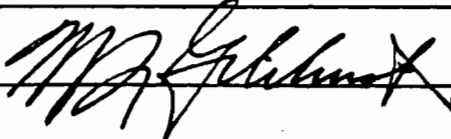
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	M. L. Gilchrist	
Signature		Date 12/8/95

STEP 5 (optional)
Enter the source AIRS
and FINDS identification
numbers, if known

AIRS
FINDS

Appendix A-1,
Abbreviations, Definitions, Citations, and Identification Numbers
(Version Dated 2/5/97)

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers (version dated 02/05/97)

Abbreviations and Acronyms:

°F: Degrees Fahrenheit
BACT: Best Available Control Technology
CFR: Code of Federal Regulations
DEP: State of Florida, Department of Environmental Protection
DARM: Division of Air Resource Management
EPA: United States Environmental Protection Agency
F.A.C.: Florida Administrative Code
F.S.: Florida Statute
ISO: International Standards Organization
LAT: Latitude
LONG: Longitude
MMBtu: million British thermal units
MW: Megawatt
ORIS: Office of Regulatory Information Systems
SOA: Specific Operating Agreement
UTM: Universal Transverse Mercator

Citations:

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.

Code of Federal Regulations:

Example: [40 CFR 60.334]

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

Florida Administrative Code (F.A.C.) Rules:

Example: [Rule 62-213, F.A.C.]

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

**Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
(version dated 02/05/97) (continued)**

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where:

105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by state database.

Permit Numbers:

Example: 1050221-002-AV, or
1050221-001-AC

Where:

AC = Air Construction Permit
AV = Air Operation Permit (Title V Source)
105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by permit tracking database
001 or 002 = 3-digit sequential project number assigned by permit tracking database

Example: PSD-FL-185
PA95-01
AC53-208321

Where:

PSD = Prevention of Significant Deterioration Permit
PA = Power Plant Siting Act Permit
AC = old Air Construction Permit numbering

Appendix SS-1,
Stack Sampling Facilities (version dated 10/7/96)

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)

Stack Sampling Facilities Provided by the Owner of an Emissions Unit. This section describes the minimum requirements for stack sampling facilities that are necessary to sample point emissions units. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. Emissions units must provide these facilities at their expense. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

(a) Permanent Test Facilities. The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.

(b) Temporary Test Facilities. The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.

(c) Sampling Ports.

1. All sampling ports shall have a minimum inside diameter of 3 inches.

2. The ports shall be capable of being sealed when not in use.

3. The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.

4. For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.

5. On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.

(d) Work Platforms.

1. Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.

2. On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.

3. On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.

4. All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.

(e) Access to Work Platform.

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)
(continued)

1. Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.

2. Walkways over free-fall areas shall be equipped with safety rails and toeboards.

(f) Electrical Power.

1. A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.

2. If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

(g) Sampling Equipment Support.

1. A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.

a. The bracket shall be a standard 3 inch x 3 inch x one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.

b. A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.

c. The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.

2. A complete monorail or dualrail arrangement may be substituted for the eyebolt and bracket.

3. When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

Appendix TV-1,
Title V Conditions (version dated 8/11/97)

APPENDIX TV-1, TITLE V CONDITIONS (version dated 08/11/97)

[Note: This attachment includes "canned conditions" developed from the "Title V Core List."]

{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

Chapter 62-4, F.A.C.

1. General Prohibition. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the Department, unless the source is exempted by Department rule. The Department may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the provisions of Chapter 403, F.S., or the rules promulgated thereunder. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit.

[Rule 62-4.030, Florida Administrative Code (F.A.C.); Section 403.087, Florida Statute (F.S.)]

2. Not federally enforceable. Procedure to Obtain Permits: Application.

(1) Any person desiring to obtain a permit from the Department shall apply on forms prescribed by the Department and shall submit such additional information as the Department by law may require.

(2) All applications and supporting documents shall be filed in quadruplicate with the Department.

(3) To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. All applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except when the application is for renewal of an air pollution operation permit at a minor facility as defined in Rule 62-210.200, F.A.C., or where professional engineering is not required by Chapter 471, F.S. Where required by Chapter 471 or 492, F.S., applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.

(4) Processing fees for air construction permits shall be in accordance with Rule 62-4.050(4), F.A.C.

(5)(a) To be considered by the Department, each application must be accompanied by the proper processing fee. The fee shall be paid by check, payable to the Department of Environmental Protection. The fee is non-refundable except as provided in Section 120.60, F.S., and in this section.

(c) Upon receipt of the proper application fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin.

(d) If the applicant does not submit the required fee within ten days of receipt of written notification, the Department shall either return the unprocessed application or arrange with the applicant for the pick up of the application.

(e) If an applicant submits an application fee in excess of the required fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin upon receipt, and the Department shall refund to the applicant the amount received in excess of the required fee.

(6) Any substantial modification to a complete application shall require an additional processing fee determined pursuant to the schedule set forth in Rule 62-4.050, F.A.C., and shall restart the time requirements of Sections 120.60 and 403.0876, F.S. For purposes of this Subsection, the term "substantial modification" shall mean a modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review.

(7) Modifications to existing permits proposed by the permittee which require substantial changes in the existing permit or require substantial evaluation by the Department of potential impacts of the proposed modifications shall require the same fee as a new application.

[Rule 62-4.050, F.A.C.]

3. Standards for Issuing or Denying Permits: Except as provided at Rule 62-213.460, F.A.C., the issuance of a permit does not relieve any person from complying with the requirements of Chapter 403, F.S., or Department rules.

[Rule 62-4.070(7), F.A.C.]

4. Modification of Permit Conditions.

(1) For good cause 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. For the purpose of this section, good cause shall include, but not be limited to, any of the following:

- (a) A showing that an improvement in effluent or emission quality or quantity can be accomplished because of technological advances without unreasonable hardship.
- (b) A showing that a higher degree of treatment is necessary to effect the intent and purpose of Chapter 403, F.S.
- (c) A showing of any change in the environment or surrounding conditions that requires a modification to conform to applicable air or water quality standards.
- (e) Adoption or revision of Florida Statutes, rules, or standards which require the modification of a permit condition for compliance.

(2) A permittee may request a modification of a permit by applying to the Department.

(3) A permittee may request that a permit be extended as a modification of the permit. Such a request must be submitted to the Department in writing before the expiration of the permit. Upon timely submittal of a request for extension, unless the permit automatically expires by statute or rule, the permit will remain in effect until final agency action is taken on the request. For construction permits, an extension shall be granted if the applicant can demonstrate reasonable assurances that, upon completion, the extended permit will comply with the standards and conditions required by applicable regulation. For all other permits, an extension shall be granted if the applicant can demonstrate reasonable assurances that the extended permit will comply with the standards and conditions applicable to the original permit. A permit for which the permit application fee was prorated in accordance with Rule 62-4.050(4)(1), F.A.C., shall not be extended. In no event shall a permit be extended or remain in effect longer than the time limits established by statute or rule.

[Rule 62-4.080, F.A.C.]

5. Renewals. Prior to one hundred eighty (180) days before the expiration of a permit issued pursuant to Chapter 62-213, F.A.C., the permittee shall apply for a renewal of a permit using forms incorporated by reference in the specific rule chapter for that kind of permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 180 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department or, if there is court review of the Department's final agency action, until a later date is required by Section 120.60, F.S., provided that, for renewal of a permit issued pursuant to Chapter 62-213, F.A.C., the applicant complies with the requirements of Rules 62-213.420(1)(b)3. and 4., F.A.C.

[Rule 62-4.090(1), F.A.C.]

6. Suspension and Revocation.

(1) Permits shall be effective until suspended, revoked, surrendered, or expired and shall be subject to the provisions of Chapter 403, F.S., and rules of the Department.

(2) Failure to comply with pollution control laws and rules shall be grounds for suspension or revocation.

(3) A permit issued pursuant to Chapter 62-4, F.A.C., shall not become a vested property right in the permittee. The Department may revoke any permit issued by it if it finds that the permit holder or the permit holder's agent:

- (a) Submitted false or inaccurate information in application or operational reports.
- (b) Has violated law, Department orders, rules or permit conditions.
- (c) Has failed to submit operational reports or other information required by Department rules.
- (d) Has refused lawful inspection under Section 403.091, F.S.

[Rule 62-4.100, F.A.C.]

7. Not federally enforceable. Financial Responsibility. The Department may require an applicant to submit proof of financial responsibility and may require the applicant to post an appropriate bond to guarantee compliance with the law and Department rules.

[Rule 62-4.110, F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 08/11/97) (continued)

8. Transfer of Permits.

(1) Within 30 days after the sale or legal transfer of a permitted facility, an "Application for Transfer of Permit" (DEP Form 62-1.201(1)) must be submitted to the Department. This form must be completed with the notarized signatures of both the permittee and the proposed new permittee.

(2) The Department shall approve the transfer of a permit unless it determines that the proposed new permittee cannot provide reasonable assurances that conditions of the permit will be met. The determination shall be limited solely to the ability of the new permittee to comply with the conditions of the existing permit, and it shall not concern the adequacy of these permit conditions. If the Department proposes to deny the transfer, it shall provide both the permittee and the proposed new permittee a written objection to such transfer together with notice of a right to request a Chapter 120, F.S., proceeding on such determination.

(3) Within 30 days of receiving a properly completed Application for Transfer of Permit form, the Department shall issue a final determination. The Department may toll the time for making a determination on the transfer by notifying both the permittee and the proposed new permittee that additional information is required to adequately review the transfer request. Such notification shall be served within 30 days of receipt of an Application for Transfer of Permit form, completed pursuant to Rule 62-4.120(1), F.A.C. If the Department fails to take action to approve or deny the transfer within 30 days of receipt of the completed Application for Transfer of Permit form, or within 30 days of receipt of the last item of timely requested additional information, the transfer shall be deemed approved.

(4) The permittee is encouraged to apply for a permit transfer prior to the sale or legal transfer of a permitted facility. However, the transfer shall not be effective prior to the sale or legal transfer.

(5) Until this transfer is approved by the Department, the permittee and any other person constructing, operating, or maintaining the permitted facility shall be liable for compliance with the terms of the permit. The permittee transferring the permit shall remain liable for corrective actions that may be required as a result of any violations occurring prior to the sale or legal transfer of the facility.

[Rule 62-4.120, F.A.C.]

9. Plant Operation-Problems. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules.

[Rule 62-4.130, F.A.C.]

10. For purposes of notification to the Department pursuant to Rule 62-4.130, F.A.C., Plant Operation-Problems, "immediately" shall mean the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the incident, excluding weekends and holidays.

[40 CFR 70.6(a)(3)(iii)(B)]

11. **Not federally enforceable.** Review. Failure to request a hearing within 14 days of receipt of notice of proposed or final agency action on a permit application or as otherwise required in Chapter 62-103, F.A.C., shall be deemed a waiver of the right to an administrative hearing.

[Rule 62-4.150, F.A.C.]

12. Permit Conditions. All permits issued by the Department shall include the following general conditions:

(1) The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. 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), F.S., the issuance of this permit does not convey any 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 of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.

APPENDIX TV-1, TITLE V CONDITIONS (version dated 08/11/97) (continued)

- (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 F.S. 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 and 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 reasonable times, access to the premises where the permitted activity is located or conducted to:
- (a) Have access to and copy any records that must be kept under 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 reasonable 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 noncompliance; and,
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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 F.S. or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. 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 F.S. after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.
- (11) This permit is transferable only upon Department approval in accordance with Rule 62-4.120, 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.
- (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 for this permit. These materials shall be retained at least five (5) 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 the 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.

[Rules 62-4.160 and 62-213.440(1)(b), F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 08/11/97) (continued)

13. Construction Permits.

(1) No person shall construct any installation or facility which will reasonably be expected to be a source of air or water pollution without first applying for and receiving a construction permit from the Department unless exempted by statute or Department rule. In addition to the requirements of Chapter 62-4, F.A.C., applicants for a Department Construction Permit shall submit the following as applicable:

- (a) A completed application on forms furnished by the Department.
- (b) An engineering report covering:
 - 1. plant description and operations,
 - 2. types and quantities of all waste material to be generated whether liquid, gaseous or solid,
 - 3. proposed waste control facilities,
 - 4. the treatment objectives,
 - 5. the design criteria on which the control facilities are based, and,
 - 6. other information deemed relevant.

Design criteria submitted pursuant to Rule 62-4.210(1)(b)5., F.A.C., shall be based on the results of laboratory and pilot-plant scale studies whenever such studies are warranted. The design efficiencies of the proposed waste treatment facilities and the quantities and types of pollutants in the treated effluents or emissions shall be indicated. Work of this nature shall be subject to the requirements of Chapter 471, F.S. Where confidential records are involved, certain information may be kept confidential pursuant to Section 403.111, F.S.

- (c) The owners' written guarantee to meet the design criteria as accepted by the Department and to abide by Chapter 403, F.S. and the rules of the Department as to the quantities and types of materials to be discharged from the installation. The owner may be required to post an appropriate bond or other equivalent evidence of financial responsibility to guarantee compliance with such conditions in instances where the owner's financial resources are inadequate or proposed control facilities are experimental in nature.

(2) The construction permit may contain conditions and an expiration date as determined by the Secretary or the Secretary's designee.

(3) When the Department issues a permit to construct, the permittee shall be allowed a period of time, specified in the permit, to construct, and to operate and test to determine compliance with Chapter 403, F.S., and the rules of the Department and, where applicable, to apply for and receive an operation permit. The Department may require tests and evaluations of the treatment facilities by the permittee at his/her expense.

[Rule 62-4.210, F.A.C.]

14. Operation Permit for New Sources. To properly apply for an operation permit for new sources, the applicant shall submit certification that construction was completed noting any deviations from the conditions in the construction permit and test results where appropriate.

[Rule 62-4.220, F.A.C.]

Chapter 62-103, F.A.C.

15. Public Notice, Public Participation, and Proposed Agency Action. The permittee shall comply with all of the requirements for public notice, public participation, and proposed agency action pursuant to Rule 62-103.150 and Rule 62-210.350, F.A.C.

[Rules 62-103.150, 62-210.350 and 62-213.430(1)(b), F.A.C.]

16. Administrative Hearing. The permittee shall comply with all of the requirements for a petition for administrative hearing or waiver of right to administrative proceeding pursuant to Rule 61-103.155, F.A.C.

[Rule 62-103.155, F.A.C.]

Chapter 62-204, F.A.C.

17. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source.

[40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

Chapter 62-210. F.A.C.

18. Permits Required. The owner or operator of any emissions unit which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from the Department prior to beginning construction, modification, or initial or continued operation of the emissions unit unless exempted pursuant to Department rule or statute. All emissions limitations, controls, and other requirements imposed by such permits shall be at least as stringent as any applicable limitations and requirements contained in or enforceable under the State Implementation Plan (SIP) or that are otherwise federally enforceable. Except as provided at Rule 62-213.460, F.A.C., issuance of a permit does not relieve the owner or operator of any emissions unit from complying with applicable emission limiting standards or other requirements of the air pollution rules of the Department, or any other applicable requirements under federal, state, or local law.

(1) Air Construction Permits. An air construction permit shall be obtained by the owner or operator of any proposed new or modified facility or emissions unit prior to the beginning of construction or modification, in accordance with all applicable provisions of Chapters 62-210, 62-212 and 62-4, F.A.C. The construction permit shall be issued for a period of time sufficient to allow construction or modification of the facility or emissions unit and operation while the new or modified facility or emissions unit is conducting tests or otherwise demonstrating initial compliance with the conditions of the construction permit.

(2) Air Operation Permits. Upon expiration of the air operation permit for any existing facility or emissions unit, subsequent to construction or modification and demonstration of initial compliance with the conditions of the construction permit for any new or modified facility or emissions unit, or as otherwise provided in Chapter 62-210 or Chapter 62-213, the owner or operator of such facility or emissions unit shall obtain a renewal air operation permit, an initial air operation permit, or an administrative correction or revision of an existing air operation permit, whichever is appropriate, in accordance with all applicable provisions of Chapter 62-210, Chapter 62-213, and Chapter 62-4, F.A.C.

(a) Minimum Requirements for All Air Operation Permits. At a minimum, a permit issued pursuant to this subsection shall:

1. Specify the manner, nature, volume and frequency of the emissions permitted, and the applicable emission limiting standards or performance standards, if any;
2. Require proper operation and maintenance of any pollution control equipment by qualified personnel, where applicable in accordance with the provisions of any operation and maintenance plan required by the air pollution rules of the Department.
3. Contain an effective date stated in the permit which shall not be earlier than the date final action is taken on the application and be issued for a period, beginning on the effective date, as provided below.

a. The operation permit for an emissions unit which is in compliance with all applicable rules and in operational condition, and which the owner or operator intends to continue operating, shall be issued or renewed for a five-year period, except that, for Title V sources subject to Rule 62-213.420(1)(a)1., F.A.C., operation permits shall be extended until 60 days after the due date for submittal of the facility's Title V permit application as specified in Rule 62-213.420(1)(a)1., F.A.C.

b. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for six months or more prior to the expiration date of the current operation permit, shall be renewed for a period not to exceed five years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided:

- (i) the owner or operator of the emissions unit demonstrates to the Department that the emissions unit may need to be reactivated and used, or that it is the owner's or operator's intent to apply to the Department for a permit to construct a new emissions unit at the facility before the end of the extension period; and,
- (ii) the owner or operator of the emissions unit agrees to and is legally prohibited from providing the allowable emission permitted by the renewed permit as an emissions offset to any other person under Rule 62-212.500, F.A.C.; and,
- (iii) the emissions unit was operating in compliance with all applicable rules as of the time the source was shut down.

c. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for five years or more prior to the expiration date of the current operation permit shall be renewed for a maximum period not to exceed ten years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided the conditions given in Rule 62-210.300(2)(a)3.b., F.A.C., are met and the owner or operator demonstrates to the Department that failure to renew the permit would constitute a hardship, which may include economic hardship.

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d. The operation permit for an electric utility generating unit on cold standby or long-term reserve shutdown shall be renewed for a five-year period, and additional five-year periods, even if the unit is not maintained in operational condition, provided the conditions given in Rules 62-210.300(2)(a)3.b.(i) through (iii), F.A.C., are met.

4. In the case of an emissions unit permitted pursuant to Rules 62-210.300(2)(a)3.b., c., and d., F.A.C., include reasonable notification and compliance testing requirements for reactivation of such emissions unit and provide that the owner or operator demonstrate to the Department prior to reactivation that such reactivation would not constitute reconstruction pursuant to Rule 62-204.800(7), F.A.C.

[Rules 62-210.300(1) & (2), F.A.C.]

19. Notification of Startup. The owner or operator of any emissions unit or facility which has a valid air operation permit and which has been shut down more than one (1) year, shall notify the Department in writing of the intent to start up such emissions unit or facility, a minimum of sixty (60) days prior to the intended startup date.

(a) The notification shall include the planned startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.

(b) If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Department as soon as possible after the date of such startup is ascertained.

[Rule 62-210.300(5), F.A.C.]

20. Emissions Unit Reclassification.

(a) Any emissions unit whose operation permit has been revoked as provided for in Chapter 62-4, F.A.C., shall be deemed permanently shut down for purposes of Rule 62-212.500, F.A.C. Any emissions unit whose permit to operate has expired without timely renewal or transfer may be deemed permanently shut down, provided, however, that no such emissions unit shall be deemed permanently shut down if, within 20 days after receipt of written notice from the Department, the emissions unit owner or operator demonstrates that the permit expiration resulted from inadvertent failure to comply with the requirements of Rule 62-4.090, F.A.C., and that the owner or operator intends to continue the emissions unit in operation, and either submits an application for an air operation permit or complies with permit transfer requirements, if applicable.

(b) If the owner or operator of an emissions unit which is so permanently shut down, applies to the Department for a permit to reactivate or operate such emissions unit, the emissions unit will be reviewed and permitted as a new emissions unit.

[Rule 62-210.300(6), F.A.C.]

21. Public Notice and Comment.

(1) Public Notice of Proposed Agency Action.

(a) Notwithstanding any discretionary public notice requirements contained in Rule 62-103.150(2)(a), F.A.C., a notice of proposed agency action on permit application, where the proposed agency action is to issue the permit, shall be published by any applicant for:

1. A construction permit for any proposed new or modified facility or emissions unit;
2. An operation permit, permit renewal or permit revision subject to Rule 62-210.300(2)(b), F.A.C.; or
3. An operation permit, permit renewal, or permit revision subject to Chapter 62-213, F.A.C., except those permit revisions meeting the requirements of Rule 62-213.412(1), F.A.C.

(b) The notice required by Rule 62-210.350(1)(a), F.A.C., shall be published in accordance with all otherwise applicable provisions of Rule 62-103.150, F.A.C.

(2) Additional Public Notice Requirements for Emissions Units Subject to Prevention of Significant Deterioration or Nonattainment-Area Preconstruction Review.

(a) Before taking final agency action on a construction permit application for any proposed new or modified facility or emissions unit subject to the preconstruction review requirements of Rule 62-212.400 or 62-212.500, F.A.C., the Department shall comply with all applicable provisions of Rule 62-103.150, F.A.C., and provide an opportunity for public comment which shall include as a minimum the following:

1. A complete file available for public inspection in at least one location in the district affected which includes the information submitted by the owner or operator, exclusive of confidential records under Section 403.111, F.S., and the Department's analysis of the effect of the proposed construction or modification on ambient air quality, including the Department's preliminary determination of whether the permit should be approved or disapproved;
2. A 30-day period for submittal of public comments; and,

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3. A notice, by advertisement in a newspaper of general circulation in the county affected, specifying the nature and location of the proposed facility or emissions unit, whether BACT or LAER has been determined, the degree of PSD increment consumption expected, if applicable, and the location of the information specified in paragraph 1. above; and notifying the public of the opportunity for submitting comments and requesting a public hearing.
- (b) The notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall be prepared by the Department and published by the applicant in accordance with all applicable provisions of Rule 62-103.150, F.A.C., except that the applicant shall cause the notice to be published no later than thirty (30) days prior to final agency action.
- (c) A copy of the notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall also be sent by the Department to the Regional Office of the U. S. Environmental Protection Agency and to all other state and local officials or agencies having cognizance over the location of such new or modified facility or emissions unit, including local air pollution control agencies, chief executives of city or county government, regional land use planning agencies, and any other state, Federal Land Manager, or Indian Governing Body whose lands may be affected by emissions from the new or modified facility or emissions unit.
- (d) A copy of the notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall be displayed in the appropriate district, branch and local program offices.
- (e) An opportunity for public hearing shall be provided in accordance with Chapter 120, F.S., and Rule 62-103.150, F.A.C.
- (f) Any public comments received shall be made available for public inspection in the location where the information specified in Rule 62-210.350(2)(a)1., F.A.C., is available and shall be considered by the Department in making a final determination to approve or deny the permit.
- (g) The final determination shall be made available for public inspection at the same location where the information specified in Rule 62-210.350(2)(a)1., F.A.C., was made available.
- (h) For a proposed new or modified emissions unit which would be located within 100 kilometers of any Federal Class I area or whose emissions may affect any Federal Class I area, and which would be subject to the preconstruction review requirements of Rule 62-212.400, F.A.C., or Rule 62-212.500, F.A.C.:
1. The Department shall mail or transmit to the Administrator a copy of the initial application for an air construction permit and notice of every action related to the consideration of the permit application.
 2. The Department shall mail or transmit to the Federal Land Manager of each affected Class I area a copy of any written notice of intent to apply for an air construction permit; the initial application for an air construction permit, including all required analyses and demonstrations; any subsequently submitted information related to the application; the preliminary determination and notice of proposed agency action on the permit application; and any petition for an administrative hearing regarding the application or the Department's proposed action. Each such document shall be mailed or transmitted to the Federal Land Manager within fourteen (14) days after its receipt by the Department.
- (3) Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
- (a) Before taking final agency action to issue a new, renewed, or revised air operation permit subject to Chapter 62-213, F.A.C., the Department shall comply with all applicable provisions of Rule 62-103.150, F.A.C., and provide an opportunity for public comment which shall include as a minimum the following:
1. A complete file available for public inspection in at least one location in the district affected which includes the information submitted by the owner or operator, exclusive of confidential records under Section 403.111, F.S.; and,
 2. A 30-day period for submittal of public comments.
- (b) The notice provided for in Rule 62-210.350(3)(a), F.A.C., shall be prepared by the Department and published by the applicant in accordance with all applicable provisions of Rule 62-103.150, F.A.C., except that the applicant shall cause the notice to be published no later than thirty (30) days prior to final agency action.
- (c) The notice shall identify:
1. The facility;
 2. The name and address of the office at which processing of the permit occurs;
 3. The activity or activities involved in the permit action;
 4. The emissions change involved in any permit revision;
 5. The name, address, and telephone number of a Department representative from whom interested persons may obtain additional information, including copies of the permit draft, the application, and all relevant supporting materials, including any permit application, compliance plan, permit, monitoring report, and compliance statement required pursuant to Chapter 62-213, F.A.C. (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), and all other materials available to the Department that are relevant to the permit decision;
 6. A brief description of the comment procedures required by Rules 62-103.150 and 62-210.350(3), F.A.C.;
 7. The time and place of any hearing that may be held, including a statement of procedure to request a hearing (unless a hearing has already been scheduled); and,

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8. The procedures by which persons may petition the Administrator to object to the issuance of the proposed permit after expiration of the Administrator's 45-day review period.

[Rule 62-210.350, F.A.C.]

22. Administrative Permit Corrections.

(1) A facility owner shall notify the Department by letter of minor corrections to information contained in a permit. Such notifications shall include:

- (a) Typographical errors noted in the permit;
- (b) Name, address or phone number change from that in the permit;
- (c) Any other similar minor administrative change at the source; and,
- (d) A change requiring more frequent monitoring or reporting by the permittee.
- (e) Changes listed at 40 CFR 72.83(a)(1), (2), (6), (9) and (10), hereby adopted and incorporated by reference, to Title V sources subject to emissions limitations or reductions pursuant to 42 USC ss. 7651-7651o;
- (f) Changes listed at 40 CFR 72.83(a)(11), hereby adopted and incorporated by reference, to Title V sources subject to emissions limitations or reductions pursuant to 42 USC ss. 7651-7651o, provided the notification is accompanied by a copy of any EPA determination concerning the similarity of the change to those listed at Rule 17-210.360(1)(e).

(2) Upon receipt of such notifications the Department shall within 60 days correct the permit and provide a corrected copy to the owner.

(3) For facilities subject to Chapter 62-213, F.A.C., a copy shall be provided to EPA and any approved local air program in the county where the facility or any part of the facility is located.

(4) The Department shall incorporate requirements resulting from issuance of new or revised construction permits into existing operation permits issued pursuant to Chapter 62-213, F.A.C., if the construction permit revisions incorporate requirements of federally enforceable preconstruction review and if the applicant requests at the time of application that all of the requirements of Rule 62-213.430(1), F.A.C., be complied with in conjunction with the processing of the construction permit application.

[Rule 62-210.360, F.A.C.]

23. Reports.

(3) Annual Operating Report for Air Pollutant Emitting Facility.

(a) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year.

(c) The annual operating report shall be submitted to the appropriate Department District or Department approved local air pollution control program office by March 1 of the following year unless otherwise indicated by permit condition or Department request.

[Rule 62-210.370(3), F.A.C.]

24. Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.

[Rule 62-210.650, F.A.C.]

25. Forms and Instructions. The forms used by the Department in the stationary source control program are adopted and incorporated by reference in this section. The forms are listed by rule number, which is also the form number, with the subject, title and effective date. Copies of forms may be obtained by writing to the Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

(1) Application for Air Permit - Long Form, Form and Instructions.

- (a) Acid Rain Part (Phase II), Form and Instructions.
 - 1. Repowering Extension Plan, Form and Instructions.
 - 2. New Unit Exemption, Form and Instructions.
 - 3. Retired Unit Exemption, Form and Instructions.

(b) Reserved.

(5) Annual Operating Report (AOR) for Air Pollutant Emitting Facility, Form and Instructions.

[Rule 62-210.900, F.A.C.]

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Chapter 62-213, F.A.C.

26. Annual Emissions Fee. Each Title V source permitted to operate in Florida must pay between January 15 and March 1 of each year, upon written notice from the Department, an annual emissions fee in accordance with Rule 62-213.205, F.A.C., and the appropriate form and associated instructions.

[Rules 62-213.205 and 62-213.900(1), F.A.C.]

27. Annual Emissions Fee. Failure to pay timely any required annual emissions fee, penalty, or interest constitutes grounds for permit revocation pursuant to Rule 62-4.100, F.A.C.

[Rule 62-213.205(1)(g), F.A.C.]

28. Annual Emissions Fee. Any documentation of actual hours of operation, actual material or heat input, actual production amount, or actual emissions used to calculate the annual emissions fee shall be retained by the owner for a minimum of five (5) years and shall be made available to the Department upon request.

[Rule 62-213.205(1)(j), F.A.C.]

29. Annual Emissions Fee. DEP Form 62-213.900(1), F.A.C., "Major Air Pollution Source Annual Emissions Fee Form", must be completed by the permittee and submitted with the annual emissions fee.

[Rule 62-213.205(4), F.A.C.]

30. Air Operation Permit Fees. After December 31, 1992, no permit application processing fee, renewal fee, modification fee or amendment fee is required for an operation permit for a Title V source.

[Rule 62-213.205(5), F.A.C.]

31. Permits and Permit Revisions Required. All Title V sources are subject to the permit requirements of Chapter 62-213, F.A.C.

[Rule 62-213.400, F.A.C.]

32. No Title V source may operate except in compliance with Chapter 62-213, F.A.C.

[Rule 62-213.400(1), F.A.C.]

33. Changes Without Permit Revision. Title V sources having a valid permit issued pursuant to Chapter 62-213, F.A.C., may make the following changes without permit revision, provided that sources shall maintain source logs or records to verify periods of operation in each alternative method of operation:

(1) Permitted sources may change among those alternative methods of operation allowed by the source's permit as provided by the terms of the permit;

(2) Permitted sources may implement the terms or conditions of a new or revised construction permit if;

(a) The application for construction permit complied with the requirements of Rule 62-213.420(3) and (4), F.A.C.;

(b) The terms or conditions were subject to federally enforceable preconstruction review pursuant to Chapter 62-212, F.A.C.; and,

(c) The new or revised construction permit was issued after the Department and the applicant complied with all the requirements of Rule 62-213.430(1), F.A.C.;

(3) A permitted source may implement operating changes after the source submits any forms required by any applicable requirement and provides the Department and EPA with at least 7 days written notice prior to implementation. The source and the Department shall attach each notice to the relevant permit;

(a) The written notice shall include the date on which the change will occur, and a description of the change within the permitted source, the pollutants emitted and any change in emissions, and any term or condition becoming applicable or no longer applicable as a result of the change;

(b) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes;

(4) Permitted sources may implement changes involving modes of operation only in accordance with Rule 62-213.415, F.A.C.

[Rule 62-213.410, F.A.C.]

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34. Immediate Implementation Pending Revision Process.

(1) Those permitted Title V sources making any change that constitutes a modification pursuant to paragraph (a) of the definition of modification at Rule 62-210.200, F.A.C., but which would not constitute a modification pursuant to paragraph (b) of the same definition, may implement such change prior to final issuance of a permit revision in accordance with Rule 62-213.412, F.A.C., provided the change:

- (a) Does not violate any applicable requirement;
- (b) Does not contravene any permit term or condition for monitoring, testing, recordkeeping or reporting, or any compliance certification requirement;
- (c) Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis under the provisions of Chapter 62-212 or 62-296, F.A.C.;
- (d) Does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject including any federally enforceable emissions cap or federally enforceable alternative emissions limit.

(2) A Title V source may immediately implement such changes after they have been incorporated into the terms and conditions of a new or revised construction permit issued pursuant to Chapter 62-212, F.A.C., and after the source provides to EPA, the Department, each affected state and any approved local air program having geographic jurisdiction over the source, a copy of the source's application for operation permit revision. The Title V source may conform its application for construction permit to include all information required by Rule 62-213.420, F.A.C., in lieu of submitting separate application forms.

(3) The Department shall process the application for operation permit revision in accordance with the provisions of Chapter 62-213, F.A.C., except that the Department shall issue a draft permit revision or a determination to deny the revision within 60 days of receipt of a complete application for operation permit revision or, if the Title V source has submitted a construction permit application conforming to the requirements of Rule 62-213.420, F.A.C., the Department shall issue a draft permit or a determination to deny the revision at the same time the Department issues its determination on issuance or denial of the construction permit application. The Department shall not take final action until all the requirements of Rule 62-213.430(1)(a), (c), (d), and (e), F.A.C., have been complied with.

(4) Pending final action on the operation permit revision application, the source shall implement the changes in accordance with the terms and conditions of the source's new or revised construction permit.

(5) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes until after the Department takes final action to issue the operation permit revision.

(6) If the Department denies the source's application for operation permit revision, the source shall cease implementation of the proposed changes.

[Rule 62-213.412, F.A.C.]

35. Permit Applications.

(1) Duty to Apply. For each Title V source, the owner or operator shall submit a timely and complete permit application in compliance with the requirements of Rules 62-213.420, 62-4.050(1) & (2), and 62-210.900, F.A.C.

(a) Timely Application.

3. For purposes of permit renewal, a timely application is one that is submitted in accordance with Rule 62-4.090, F.A.C.

(b) Complete Application.

1. Any applicant for a Title V permit, permit revision or permit renewal must submit an application on DEP Form No. 62-210.900(1), which must include all the information specified by Rule 62-213.420(3), F.A.C., except that an application for permit revision must contain only that information related to the proposed change. The applicant shall include information concerning fugitive emissions and stack emissions in the application. Each application for permit, permit revision or permit renewal shall be certified by a responsible official in accordance with Rule 62-213.420(4), F.A.C.

2. For those applicants submitting initial permit applications pursuant to Rule 62-213.420(1)(a)1., F.A.C., a complete application shall be an application that substantially addresses all the information required by the application form number 62-210.900(1), and such applications shall be deemed complete within sixty days of receipt of a signed and certified application unless the Department notifies the applicant of incompleteness within that time. For all other applicants, the applications shall be deemed complete sixty days after receipt, unless the Department, within sixty days after receipt of a signed application for permit, permit revision or permit renewal, requests additional documentation or information needed to process the application. An applicant making timely and complete application for permit, or timely application for permit renewal as described by Rule 62-4.090(1), F.A.C., shall continue to operate the source

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under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, provided the applicant complies with all the provisions of Rules 62-213.420(1)(b)3. and 4. F.A.C. Failure of the Department to request additional information within sixty days of receipt of a properly signed application shall not impair the Department's ability to request additional information pursuant to Rules 62-213.420(1)(b)3. and 4., F.A.C.

3. For those permit applications submitted pursuant to the provisions of Rule 62-213.420(1)(a)1., F.A.C., the Department shall notify the applicant if the Department becomes aware at any time during processing of the application that the application contains incorrect or incomplete information. The applicant shall submit the corrected or supplementary information to the Department within ninety days unless the applicant has requested and been granted additional time to submit the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days or such additional time as requested and granted shall render the application incomplete.

4. For all applications other than those addressed at Rule 62-213.420(1)(b)3., F.A.C., should the Department become aware, during processing of any application that the application contains incorrect information, or should the Department become aware, as a result of comment from an affected State, an approved local air program, EPA, or the public that additional information is needed to evaluate the application, the Department shall notify the applicant within 30 days. When an applicant becomes aware that an application contains incorrect or incomplete information, the applicant shall submit the corrected or supplementary information to the Department. If the Department notifies an applicant that corrected or supplementary information is necessary to process the permit, and requests a response, the applicant shall provide the information to the Department within ninety days of the Department request unless the applicant has requested and been granted additional time to submit the information or, the applicant shall, within ninety days, submit a written request that the Department process the application without the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days, or such additional time as requested and granted, or to demand in writing within ninety days that the application be processed without the information shall render the application incomplete. Nothing in this section shall limit any other remedies available to the Department.

[Rules 62-213.420(1)(a)3. and 62-213.420(1)(b)1., 2., 3. & 4., F.A.C.]

36. Confidential Information. Whenever an applicant submits information under a claim of confidentiality pursuant to Section 403.111, F.S., the applicant shall also submit a copy of all such information and claim directly to EPA.

[Rule 62-213.420(2), F.A.C.]

37. Standard Application Form and Required Information. Applications shall be submitted under Chapter 62-213, F.A.C., on forms provided by the Department and adopted by reference in Rule 62-210.900(1), F.A.C. The information as described in Rule 62-210.900(1), F.A.C., shall be included for the Title V source and each emissions unit. An application must include information sufficient to determine all applicable requirements for the Title V source and each emissions unit and to evaluate a fee amount pursuant to Rule 62-213.205, F.A.C.

[Rule 62-213.420(3), F.A.C.]

38. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[Rule 62-213.420(4), F.A.C.]

39.a. Permit Renewal and Expiration. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information identified in Rules 62-210.900(1) and 62-213.420(3), F.A.C. Unless a Title V source submits a timely application for permit renewal in accordance with the requirements of Rule 62-4.090(1), F.A.C., the existing permit shall expire and the source's right to operate shall terminate.

b. Permit Revision Procedures. Permit revisions shall meet all requirements of Chapter 62-213, F.A.C., including those for content of applications, public participation, review by approved local programs and affected states, and review by EPA, as they apply to permit issuance and renewal, except that permit revisions for those activities implemented pursuant to Rule 62-213.412, F.A.C., need not meet the requirements of Rule 62-213.430(1)(b), F.A.C. The Department shall require permit revision in accordance with the provisions of Rule 62-4.080, F.A.C., and 40 CFR 70.7(f), whenever any source becomes

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subject to any condition listed at 40 CFR 70.7(f)(1), hereby adopted and incorporated by reference. The below requirements from 40 CFR 70.7(f) are adopted and incorporated by reference in Rule 62-213.430(4), F.A.C.:

o 40 CFR 70.7(f): Reopening for Cause.

(1) This section contains provisions from 40 CFR 70.7(f) that specify the conditions under which a Title V permit shall be reopened prior to the expiration of the permit. A Title V permit shall be reopened and revised under any of the following circumstances:

(i) Additional applicable requirements under the Act become applicable to a major Part 70 source with a remaining permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii).

(ii) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approved by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

(iii) The permitting authority or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

(iv) The Administrator or the permitting authority determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(2) Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

(3) Reopenings under 40 CFR 70.7(f)(1) shall not be initiated before a notice of such intent is provided to the Part 70 source by the permitting authority at least 30 days in advance of the date that the permit is to be reopened, except that the permitting authority may provide a shorter time period in the case of an emergency.

[Rules 62-213.430(3) & (4), F.A.C.; and, 40 CFR 70.7(f)]

40. Permit Duration. Operation permits for Title V sources may not be extended as provided in Rule 62-4.080(3), F.A.C., if such extension will result in a permit term greater than five (5) years.

[Rule 62-213.440(1)(a), F.A.C.]

41. Monitoring Information. All records of monitoring information shall specify the date, place, and time of sampling or measurement and the operating conditions at the time of sampling or measurement, the date(s) analyses were performed, the company or entity that performed the analyses, the analytical techniques or methods used, and the results of such analyses.

[Rule 62-213.440(1)(b)2.a., F.A.C.]

42. Retention of Records. Retention of records of all monitoring data and support information shall be for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

[Rule 62-213.440(1)(b)2.b., F.A.C.]

43. Monitoring Reports. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports.

[Rule 62-213.440(1)(b)3.a., F.A.C.]

44. Deviation from Permit Requirements Reports. The permittee shall report in accordance with the requirements of Rules 62-210.700(6) and 62-4.130, F.A.C., any deviations from permit requirements, including those attributable to upset conditions as defined in the permit. Reports shall include the probable cause of such deviations, and any corrective actions or preventive measures taken.

[Rule 62-213.440(1)(b)3.b., F.A.C.]

45. Reports. All reports shall be accompanied by a certification by a responsible official, pursuant to Rule 62-213.420(4), F.A.C.

[Rule 62-213.440(1)(b)3.c., F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 08/11/97) (continued)

46. If any portion of the final permit is invalidated, the remainder of the permit shall remain in effect.

[Rule 62-213.440(1)(d)1., F.A.C.]

47. It shall not be a defense for a permittee in an enforcement action that maintaining compliance with any permit condition would necessitate halting of or reduction of the source activity.

[Rule 62-213.440(1)(d)3., F.A.C.]

48. A Title V source shall comply with all the terms and conditions of the existing permit until the Department has taken final action on any permit renewal or any requested permit revision, except as provided at Rule 62-213.412(2), F.A.C.

[Rule 62-213.440(1)(d)4., F.A.C.]

49. A situation arising from sudden and unforeseeable events beyond the control of the source which causes an exceedance of a technology-based emissions limitation because of unavoidable increases in emissions attributable to the situation and which requires immediate corrective action to restore normal operation, shall be an affirmative defense to an enforcement action in accordance with the provisions and requirements of 40 CFR 70.6(g)(2) and (3), hereby adopted and incorporated by reference.

[Rule 62-213.440(1)(d)5., F.A.C.]

50. Confidentiality Claims. Any permittee may claim confidentiality of any data or other information by complying with Rule 62-213.420(2), F.A.C.

[Rule 62-213.440(1)(d)6., F.A.C.]

51. Statement of Compliance. The permittee shall submit a statement of compliance with all terms and conditions of the permit. Such statement shall be submitted to the Department and EPA annually, or more frequently if specified by Rule 62-213.440(2), F.A.C., or by any other applicable requirement. The statement of compliance shall include the identity of each term or condition of the permit for which each unit has remained in compliance during the period covered by the statement. The statement shall include identification of all methods used to demonstrate compliance and identification of each term or condition of the permit for which any unit has not remained in compliance during the period covered by the statement. For each term or condition for which the source has not remained in compliance during the period covered by the statement, the statement shall also identify each unit not in compliance and each term and condition with which the unit was not in compliance and state the inclusive dates that the source was not in compliance, the actions taken to achieve compliance and the method used to demonstrate compliance. Such statement shall be accompanied by a certification by a responsible official, in accordance with Rule 62-213.420(4), F.A.C.

[Rule 62-213.440(3), F.A.C.]

52. Permit Shield. Except as provided in Chapter 62-213, F.A.C., compliance with the terms and conditions of a permit issued pursuant to Chapter 62-213, F.A.C., shall be deemed compliance with any applicable requirements in effect as of the date of permit issuance, provided that the source included such applicable requirements in the permit application. Nothing in Rule 62-213.460, F.A.C., or in any permit shall alter or affect the ability of EPA or the Department to deal with an emergency, the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance, or the requirements of the Federal Acid Rain Program.

[Rule 62-213.460, F.A.C.]

53. Forms and Instructions. The forms used by the Department in the Title V source operation program are adopted and incorporated by reference in Rule 62-213.900, F.A.C. The form is listed by rule number, which is also the form number, and with the subject, title, and effective date. Copies of forms may be obtained by writing to the Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, or by contacting the appropriate permitting authority.

(1) Major Air Pollution Source Annual Emissions Fee (AEF) Form.

[Rule 62-213.900(1), F.A.C.]

Chapter 62-256, F.A.C.

54. **Not federally enforceable.** Open Burning. This permit does not authorize any open burning nor does it constitute any waiver of the requirements of Chapter 62-256, F.A.C. Source shall comply with Chapter 62-256, F.A.C., for any open burning at the source.

[Chapter 62-256, F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 08/11/97) (continued)

Chapter 62-281, F.A.C.

55. Refrigerant Requirements. Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed at 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or Class II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts B and F, and with Rule 62-281.100, F.A.C. Those requirements include the following restrictions:

- (1) Any facility having any refrigeration equipment normally containing 50 (fifty) pounds of refrigerant, or more, must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added pursuant to 40 CFR 82.166;
 - (2) No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided at 40 CFR 82.34 and 40 CFR 82.40, and properly uses equipment approved pursuant to 40 CFR 82.36 and 40 CFR 82.38, and complies with 40 CFR 82.42;
 - (3) No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or Class II substance at 40 CFR 82, Subpart A, Appendices A and B, except in compliance with Rule 62-281.100, F.A.C., and 40 CFR 82.34(b), 40 CFR 82.42, and/or 40 CFR 82.166;
 - (4) No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or Class II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined at 40 CFR 82.152) for service, maintenance or repair unless the person has been properly trained and certified pursuant to 40 CFR 82.161 and unless the person uses equipment certified for that type of appliance pursuant to 40 CFR 82.158 and unless the person observes the practices set forth at 40 CFR 82.156 and 40 CFR 82.166;
 - (5) No person may dispose of appliances (except small appliances, as defined at 40 CFR 82.152) without using equipment certified for that type of appliance pursuant to 40 CFR 82.158 and without observing the practices set forth at 40 CFR 82.156 and 40 CFR 82.166;
 - (6) No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined at 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82, Subpart F.
- [40 CFR 82; and, Chapter 62-281, F.A.C. (**Chapter 62-281, F.A.C., is not federally enforceable**)]

Chapter 62-296, F.A.C.

56. **Not federally enforceable until SIP approved.** Industrial, Commercial, and Municipal Open Burning Prohibited. Open burning in connection with industrial, commercial, or municipal operations is prohibited, except when:

- (a) Open burning is determined by the Department to be the only feasible method of operation and is authorized by an air permit issued pursuant to Chapter 62-210 or 62-213, F.A.C.; or
- (b) An emergency exists which requires immediate action to protect human health and safety; or
- (c) A county or municipality would use a portable air curtain incinerator to burn yard trash generated by a hurricane, tornado, fire or other disaster and the air curtain incinerator would otherwise be operated in accordance with the permitting exemption criteria of Rule 62-210.300(3), F.A.C.

[Rule 62-296.320(3), F.A.C.]

57. Unconfined Emissions of Particulate Matter.

(4)(c)1. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any emissions unit whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.

3. Reasonable precautions may include, but shall not be limited to the following:

- a. Paving and maintenance of roads, parking areas and yards.
- b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar emissions units.
- d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the emissions unit to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- e. Landscaping or planting of vegetation.
- f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- g. Confining abrasive blasting where possible.
- h. Enclosure or covering of conveyor systems.

4. In determining what constitutes reasonable precautions for a particular facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

[Rules 62-296.320(4)(c)1., 3., & 4. F.A.C.]

[electronic file name: tv-1.doc]

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 1-1, Summary of Air Pollutant Standards and Terms

Gulf Power Company
Lansing Smith Generating Plant

DRAFT Permit No.: 0050014-001-AV
Facility ID No.: 0050014

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of the permit.

E. U. ID No.	Brief Description	Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See Permit Condition(s)
					Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
-001	Boiler #1 (1,944.8 MMBtu/hour - Coal) (153 MMBtu/hour - Oil)	VE	Coal	8760	40%			N/A	N/A	62-296.405(1)(a)	A.5.
			No. 2 Fuel Oil	8760	40%			N/A	N/A	62-296.405(1)(a)	A.5.
	-Acid Rain Phase II Unit	PM	Coal	8760	0.1 lb/MMBtu	N/A	N/A	122.9	538.3	62-296.405(1)(b)	A.7.
			No. 2 Fuel Oil	8760	0.1 lb/MMBtu	N/A	N/A	15.3	67.0	62-296.405(1)(b)	A.7.
		PM - SB **	Coal	3 hr/day	0.3 lb/MMBtu	N/A	N/A	368.7	672.9	62-210.700(3)	A.8.
			No. 2 Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	45.9	83.8	62-210.700(3)	A.8.
SO ₂	Coal	8760	4.40 lb/MMBtu	N/A	N/A	8,557.1	37,480.2	62-296.405(1)(c)	A.9.		
	No. 2 Fuel Oil	8760	0.5% Sulfur	N/A	N/A	75.8	330.6	Applicant Request	A.10.		
-002	Boiler #2 (2,246.2 MMBtu/hour - Coal) (75.9 MMBtu/hour - Oil)	VE	Coal	8760	40%			N/A	N/A	62-296.405(1)(a)	A.5.
			No. 2 Fuel Oil	8760	40%			N/A	N/A	62-296.405(1)(a)	A.5.
	-Acid Rain Phase II Unit	PM	Coal	8760	0.1 lb/MMBtu	N/A	N/A	140.4	615.0	62-296.405(1)(b)	A.7.
			No. 2 Fuel Oil	8760	0.1 lb/MMBtu	N/A	N/A	7.6	33.2	62-296.405(1)(b)	A.7.
		PM - SB **	Coal	3 hr/day	0.3 lb/MMBtu	N/A	N/A	421.2	768.7	62-210.700(3)	A.8.
			No. 2 Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	22.8	41.6	62-210.700(3)	A.8.
SO ₂	Coal	8760	4.40 lb/MMBtu	N/A	N/A	9,883.3	43,288.8	62-296.405(1)(c)	A.9.		
	No. 2 Fuel Oil	8760	0.5% Sulfur	N/A	N/A	37.6	164.5	Applicant Request	A.10.		
-003	Combustion Turbine (542 MMBtu/hour)	VE	No. 2 F.O.	8760	Less than 20%			N/A	N/A	62-296.320(4)(b)	B.5.
		SO ₂	No. 2 F.O.	8760	0.5% sulfur	N/A	N/A	263.6	1,154.7	AO37-242824	B.6.

Notes:

* The "Equivalent Emissions" listed are for informational purposes.

** PM - SB refers to "soot blowing" and "load change".

Table 2-1, Summary of Compliance Requirements

Table 2-1, Summary of Compliance Requirements

Gulf Power Company
Lansing Smith Generating Plant

DRAFT Permit No.: 0050014-001-AV
Facility ID No.: 0050014

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E. U. ID No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time	Frequency	Min. Compliance Test	CMS ¹	See Permit Condition(s)
					Frequency	Base Date ²	Duration		
-001	Boiler #1 (1,944.8 MMBtu/hour - Coal) (153 MMBtu/hour -Oil)	VE	Coal	DEP method 9	Annually ³	Sept., 30	60 Minutes	Yes	A.14., 17., 18. - 20., 23, 25., 28. - 35.
			No. 2 Fuel Oil	DEP method 9	Annually ³	Sept., 30	60 Minutes	Yes	
	-Acid Rain Phase II Unit	PM	Coal	17, 5, 5B or 5F	Annually ³	Sept., 30	1 Hour	No	A.17., 18., 21., 25. - 35.
			No. 2 Fuel Oil	17, 5, 5B or 5F	Annually ³	Sept., 30	1 Hour	No	
-Acid Rain Phase II Unit	SO ₂	Coal	6, 6A, 6B or 6C	Annually ³	Sept., 30	1 Hour	Yes	A.14. - 18., 22. - 35.	
		No. 2 Fuel Oil	Fuel Sampling & Analysis Provided by Vendor				Yes		
-002	Boiler #2 (2,246.2 MMBtu/hour - Coal) (75.9 MMBtu/hr - Oil)	VE	Coal	DEP method 9	Annually ³	Sept., 30	60 Minutes	Yes	A.14., 17., 18. - 20., 23, 25., 28. - 35.
			No. 2 Fuel Oil	DEP method 9	Annually ³	Sept., 30	60 Minutes	Yes	
	-Acid Rain Phase II Unit	PM	Coal	17, 5, 5B or 5F	Annually ³	Sept., 30	1 Hour	No	A.17., 18., 21., 25. - 35.
			No. 2 Fuel Oil	17, 5, 5B or 5F	Annually ³	Sept., 30	1 Hour	No	
-Acid Rain Phase II Unit	SO ₂	Coal	6, 6A, 6B or 6C	Annually ³	Sept., 30	1 Hour	Yes	A.14. - 18., 22. - 35.	
		No. 2 Fuel Oil	Fuel Sampling & Analysis Provided by Vendor				Yes		
-003	Combustion Turbine A. Combustion Turbine B.	VE	No. 2 F.O.	EPA Method 9	Annually ⁴	10/1 - 11/30	60 Minutes	No	B.10., 11., 13.-17.
			Natural Gas	EPA Method 9	Annually ⁴	10/1 - 11/30	60 Minutes	No	
	Combustion Turbine B.	SO ₂	No. 2 F.O.	Fuel Sampling & Analysis Provided by Vendor				No	B.9., B.12. & B.16.

Notes:

¹ CMS [=] continuous monitoring system used for compliance in lieu of stack test if marked 'yes'.

(Acceptable as long as CMS is maintained and calibrated as required.)

² Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

³ Test not required in years that liquid and/or solid fuel fired less than 400 hours.

⁴ If a combustion turbine is operated less than 400 hours per year, test is only required once every 5 years, during the year prior to permit renewal.

Gulf Power Company
Lansing Smith Electric Generating Plant
Facility ID No.: 0050014
Bay County

Initial Title V Air Operation Permit
DRAFT Permit No.: 0050014-001-AV

Permitting Authority

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344
Fax: 850/922-6979

Initial Title V Air Operation Permit

DRAFT Permit No.: 0050014-001-AV

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Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

Permittee:

Gulf Power Company
500 Bay Front Parkway
Pensacola, Florida 32520-0100

DRAFT Permit No.: 0050014-001-AV

Facility ID No.: 0050014

SIC Nos.: 49, 4911

Project: Initial Title V Air Operation Permit

This permit is for the operation of the Lansing Smith Electric Generating Plant. This facility is located at 4300 County Road, Bay County; UTM Coordinates: Zone 16, 625.03 km East and 3349.08 km North; Latitude: 30° 16' 08" North and Longitude: 85° 42' 01" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix E-1, List of Exempt Emissions Units and/or Activities
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Phase II Acid Rain Permit Application/Compliance Plan Received December 8, 1995
Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)
Appendix TV-1, Title V Conditions (version dated 2/27/97)

Effective Date: January 1, 1998

Renewal Application Due Date: July 5, 2002

Expiration Date: December 31, 2002

Howard L. Rhodes, Director,
Division of Air Resources Management

HLR/sms/jh

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of two coal fired steam generators (boilers) and one combustion turbine (used to drive a single peaking generator). The two boilers are Acid Rain Phase II 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. Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

The use of 'Permitting Notes' throughout this permit are for informational purposes, only, and are not permit conditions.

Subsection B. Summary of Emissions Unit ID Numbers and Brief Descriptions.

<u>E.U. ID No.</u>	<u>Brief Description</u>
-001	Boiler Number 1 - 1,229 MMBtu/hour (Phase II Acid Rain Unit)
-002	Boiler Number 2 - 1,404 MMBtu/hour (Phase II Acid Rain Unit)
-003	Combustion Turbine - 542 MMBtu/hour Peaking Unit
-aaa	Material Handling of Coal and Ash (See Appendix U-1)
-bbb	Fugitive PM Sources - On-site Vehicles (See Appendix U-1)
-ccc	General Purpose Internal Combustion Engines (See Appendix U-1)

Please reference the Permit Number, the Facility Identification Number, and the appropriate Emissions Unit(s) ID Number(s) on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The following documents are part of this permit:

Appendix E-1, List of Exempt Emissions Units and/or Activities

Appendix U-1, List of Unregulated Emissions Units and/or Activities

Phase II Acid Rain Permit Application/Compliance Plan Received December 8, 1995

Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)

Appendix TV-1, Title V Conditions (version dated 2/27/97)

{Permitting Note: The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.}

These documents are provided to the permittee for information purposes only:

Appendix H-1, Permit History / ID Number Transfers

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers (version dated 2/5/97)

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendix TV-1, Title V Conditions, is a part of this permit.
{Permitting note: Appendix TV-1, Title V Conditions is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68 the permittee shall submit to the implementing agency:
 - a) a risk management plan (RMP) when, and if, such requirement becomes applicable, and
 - b) certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
4. Exempt Emissions Units and/or Activities. Appendix E-1, List of Exempt Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]
6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
{Permitting Note: No vapor emission control devices or systems are deemed necessary nor ordered by the Department as of the issuance date of this permit.}
[Rule 62-296.320(1)(a), F.A.C.]
7. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

8. **Not federally enforceable.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a) Grassing over each section of the ash landfill as it reaches its capacity.
- b) Regular packing of the coal pile to reduce blowing dust and aid in the prevention of coal fires.
- c) Application of a dust suppressant to the coal on the conveyor belts as necessary.

[Rules 62-296.320(4)(c)2., F.A.C.; and, Proposed by applicant in initial Title V permit application received June 14, 1996]

9. The Department's Northwest District Branch Office (Panama City) telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 872-4375, day or night, and for emergencies involving a significant threat to human health or the environment is (850) 413-9911. The Department's Northwest District Office (Pensacola) telephone number for routine business, including compliance test notifications, is (850) 444-8364 during normal working hours.

10. The permittee shall submit all compliance related notifications and reports required by this permit to the Department's Northwest District Office located at 160 Governmental Center, Pensacola, Florida 32501-5794.

Section III. Emissions Units and Conditions.

Subsection A. This section addresses the following emissions units.

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-001	Boiler Number 1 (Phase II Acid Rain Unit)
-002	Boiler Number 2 (Phase II Acid Rain Unit)

Emissions unit number -001 is a tangentially fired, dry bottom boiler designated as “Boiler Number 1”. It is rated at a maximum heat input of 1,229 million Btu per hour (MMBtu/hour) when firing pulverized coal or distillate fuel oil. Emissions unit number -002 is a tangentially fired, dry bottom boiler designated as “Boiler Number 2”. It is rated at a maximum heat input of 1,404 million Btu per hour (MMBtu/hour) when firing pulverized coal or distillate fuel oil. Both units are Phase II Acid Rain Units.

{Permitting notes: These emissions units are regulated under Acid Rain, Phase II. These emissions units pre-date PSD regulations, but are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Fired Steam Generators with more than 250 million Btu per Hour Heat Input. Unit 1: PM emissions are controlled by a hot side (Buell Model # BAL 2X34N333-4-3P) and a cold side (General Electric Model # BE1.2X21(12)30-1.5-1.5-4.2P) electrostatic precipitator. Unit 1 began commercial operation on May 12, 1965. Unit 2: PM emissions are controlled by a hot side (Buell Model # BAL 2X34N333-4-3P) and a cold side (GE-ESI Model # BE2.1X(2-12’s)(12)-30-111-4.3P) electrostatic precipitator. Unit 2 began commercial operation on April 9, 1967. Units 1 and 2 share a common stack. Stack height = 199 feet, exit diameter = 18.0 feet, exit temperature = 260 °F, actual volumetric flow rate = 984,400 acfm.}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
-001	1,229	Coal
	153	No. 2 Fuel Oil
	153	On-Specification Used Oil
-002	1,404	Coal
	76	No. 2 Fuel Oil
	76	On-Specification Used Oil

[Rules 62-4.160(2), 62-210.200(PTE) & 62-296.405, F.A.C.; permits AC03-2023 & AC03-2024; and, Applicant’s request in initial Title V permit application received June 14, 1996.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **A.27.**

[Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation - Fuels. The fuels that are allowed to be burned in these boilers are coal and/or new No. 2 fuel oil and/or on-specification used oil (see specific condition **A.35.**). Fuel oil is only used for periods of start-up and as needed for flame stabilization. Also, on-site generated "oil contaminated soil" is periodically combusted for energy recovery purposes.
[Rule 62-213.410, F.A.C.; and, Applicant's request in initial Title V permit application dated June 14, 1996.]

A.4. Hours of Operation. These emissions units may operate continuously, i.e. 8760 hours/year. For each emissions unit, the permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation, including a detailed account of the hours operated on each of the allowable fuels.
[Rules 62-213.440 & 62-210.200(PTE), F.A.C.; and, Applicant's request in initial Title V application received June 14, 1996.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. Visible Emissions. Visible emissions shall not exceed 40 percent opacity. Because units 1 and 2 share a common stack, visible emissions violations from the stack will be attributed to both units unless opacity meter results show the specific unit causing the violation.
[Rule 62-296.405(1)(a), F.A.C.; and, Secretarial ORDER(s) signed October 18, 1985, and December 1, 1982; and, AO03-211310, Specific Condition 10.]

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6)-minute periods, during the 3-hour period of excess emissions allowed for boiler cleaning and load changes, at units which have installed continuous opacity monitors.

[Rule 62-210.700(3), F.A.C.]

A.7. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.
[Rule 62-296.405(1)(b), F.A.C.]

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

[Rule 62-210.700(3), F.A.C.]

A.9. Sulfur Dioxide - Solid Fuel. When burning solid fuel, sulfur dioxide emissions shall not exceed 6.17 pounds per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(c)2.d., F.A.C.]

A.10. Sulfur Dioxide - Sulfur Content. The No. 2 fuel oil sulfur content shall not exceed 0.5 percent, by weight, as measured by applicable test methods.

[Applicant request in initial Title V permit application received June 14, 1996.]

Excess Emissions

A.11. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

A.12. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.]

A.13. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

{Permitting Note: In accordance with the Acid Rain Phase II requirements, the following continuous monitors are installed on these units: SO₂, NO_x, CO₂ and stack gas flow.}

A.14. Continuous Monitors. These emissions units shall have installed, and shall maintain, continuous monitoring systems for monitoring opacity and CO₂.

[Rule 62-405(1)(f)1., F.A.C.]

A.15. Sulfur Dioxide. Those emissions units not having an operating flue gas desulfurization device may monitor sulfur dioxide emissions by fuel sampling and analysis according to methods approved by the EPA. **The permittee elected to demonstrate compliance using the SO₂ continuous emissions monitor installed in accordance with 40 CFR 75. In addition, compliance with the liquid fuel sulfur limit will be verified by a fuel analysis provided by the vendor upon each fuel delivery (see specific condition A.23.).**

[Rule 62-296.405(1)(f)1.b., F.A.C.]

A.16. 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.]

Required Tests, Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.17. Visible Emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. **The Permittee has elected to utilize a transmissometer (opacity meter) for demonstrating compliance with the visible emissions limit.**

[Rules 62-213.440 and 62-296.405(1)(e)1., F.A.C.]

A.18. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
 - a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
 - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding

the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rules 62-297.310, and 62-297.401, F.A.C.]

A.19. Particulate Matter. The test methods for particulate matter emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-213.440, 62-296.405(1)(e)2., 62-297.310, and 62-297.401, F.A.C.]

A.20. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, the permittee has elected to demonstrate compliance using the SO₂ continuous emissions monitor installed in accordance with 40 CFR 75.**

[Rules 62-213.440, 62-296.405(1)(e)3., & 62-297.310, 62-297.401, F.A.C.; and, AO03-211310]

A.21. Continuous SO₂ emissions monitoring 24-hour averages are required to demonstrate compliance with the standards of the Department. A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emissions standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the permittee has verified the problem or no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO₂ emissions compliance by the temporary use of a spare SO₂ emissions monitor. The spare SO₂ emissions monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

Maintain a QC program. At a minimum, the QC program must include written procedures which shall describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. CD determination and adjustment of CEMS.
3. Preventative maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling-and analysis methods.

6. Program of corrective action for malfunctioning CEMS.
[Rule 62-213.440, F.A.C.; and, AO03-211310.]

A.22. Continuous Monitor Performance Specifications. If continuous monitoring systems are required by rule or are elected by the permittee to be used for demonstrating compliance with the standards of the Department, they must be installed, maintained and calibrated in accordance with the EPA performance specifications listed below. These Performance Specifications are contained in 40 CFR 60, Appendix B, and are adopted by reference in Rule 62-204.800, F.A.C.

- (1) Performance Specification 1--Specifications and Test Procedures for Opacity Continuous Emission Monitoring Systems in Stationary Sources.
- (2) Performance Specification 2--Specifications and Test Procedures for SO₂ and NO_x Continuous Emission Monitoring Systems in Stationary Sources.
- (3) Performance Specification 3--Specifications and Test Procedures for O₂ and CO₂ Continuous Emission Monitoring Systems in Stationary Sources.

[Rule 62-297.520, F.A.C.]

A.23. The following fuel sampling and analysis protocol shall be used as an alternate sampling procedure authorized by permit to demonstrate compliance with the sulfur dioxide standard in the event that the SO₂ continuous emissions monitor is not able to capture valid data:

- a. Determine and record the as-fired fuel sulfur content, percent by weight, for liquid fuels using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition, to analyze a representative sample of the blended fuel following each fuel delivery. **Compliance with the liquid fuel sulfur limit established in specific condition 10. shall be verified with a fuel analysis provided by the vendor upon each fuel oil delivery.**
- b. Determine and record the as-fired fuel sulfur content, percent by weight, for coal using ASTM D2013-72 and either ASTM D3177-75 or ASTM D4239-85, or the latest edition, to analyze a representative sample of the blended as-fired pulverized coal.
- c. Determine and record the density (using ASTM D 1298-80, or equivalent) and the calorific heat value in Btu per pound (using ASTM D 240-76, or the latest edition) of the fuel oil combusted.
- d. Determine and record the calorific heat value in Btu per pound of the blended, as-fired pulverized coal using ASTM D2013-72 and either ASTM D2015-77 or D3286-(latest version), or the latest edition.
- e. Record daily the amount of each fuel fired, the density of the fuel oil, the heating value of each fuel fired, and the percent sulfur content, by weight, of each fuel fired.
- f. Utilize the information in a., b., c., d. and e., above, to calculate the SO₂ emission rate to ensure compliance at all times.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

A.24. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;
 - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
 - c. Each NESHAP pollutant, if there is an applicable emission standard.
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.
9. 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.
10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) 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.

- (c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.]

Compliance Test Requirements

A.25. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

A.26. 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 the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

A.27. Operating Rate During Testing. Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity as defined below. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load 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.

- (b) All Other Sources. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.

[Rule 62-297.310(2), F.A.C.]

A.28. Applicable Test Procedures.

(a) Required Sampling Time.

1. 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.
2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
 - b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
 - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

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

TABLE 297.310-1
CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		Comparison check	5%

A.29. 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.]

Recordkeeping and Reporting Requirements

{Permitting Note: The reports that are required by the following conditions are to be sent to the Northwest District office, 160 Governmental Center, Pensacola, Florida 322501-5794}

A.30. The owner or operator shall maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. These records must be of sufficient detail to determine compliance with the allowable sulfur dioxide emission limitations.

[Rules 62-213.440 & 62-4.070(3), F.A.C.]

A.31. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

A.32. Submit to the Department a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

A.33. A maintenance log of the continuous monitoring systems shall be kept showing:

- a. Time out of service.
- b. Calibration and adjustments.

[Rule 62-213.440, F.A.C.; and, AO03-211310, specific condition 8.]

A.34. Test Reports.

- (a) 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.
- (b) 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.
- (c) 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.
 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.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

Miscellaneous Conditions.

A.35. Used Oil. Burning of on-specification used oil is allowed in this emissions unit in accordance with all other conditions of this permit and the following conditions:

- a. On-specification Used Oil Emissions Limitations: This emissions unit is permitted to burn on-specification used oil, which contains a PCB concentration of less than 50 ppm. On-specification used oil is defined as used oil that meets the specifications of 40 CFR 279 - Standards for the Management of Used Oil, listed below. "Off-specification" used oil shall not be burned. Used oil which fails to comply with any of these specification levels is considered "off-specification" used oil.

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash point	100 degrees F minimum

- b. Quantity Limitation: This emissions unit is permitted to burn "on-specification" used oil that is generated by Gulf Power, not to exceed 50,000 gallons per calendar year in each boiler (1 & 2).
- c. PCB Limitation: Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement.
- d. Operational Requirements: On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.
- e. Testing Requirements: The owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs.

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

- f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
- (1) The gallons of on-specification used oil generated and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
 - (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
 - (3) Results of the analyses required above.
- [40 CFR 279.61 and 761.20(e)]
- g. Reporting Requirements: The owner or operator shall submit to the Northwest District office, within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

The owner or operator shall submit, with the Annual Operation Report form, the analytical results and the total amount of on-specification used oil burned during the previous calendar year.

[Rule 62-4.070(3) and 62-213.440, F.A.C., 40 CFR 279 and 40 CFR 761, unless otherwise noted.]

Subsection B. This section addresses the following emissions unit(s).

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-003	Combustion Turbines A & B

Emissions unit number -003 is two simple cycle combustion turbines manufactured by Pratt and Whitney that are used as a peaking units. It consists of a single engine used to drive two combustion turbines designated as turbine A & turbine B. Each combustion turbine is connected to a separate generator. The engine is rated at a maximum heat input of 542 million Btu per hour (MMBtu/hour) while being fueled by No. 2 fuel oil with a maximum sulfur content of 0.5%, by weight. Emissions from these combustion turbines are uncontrolled.

{Permitting notes: This emissions unit is regulated under Rule 62-210.300, F.A.C., Permits Required. These turbines are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. Each combustion turbine has its own stack. Stack heights = 33 feet, exit diameters = 13.7 feet, exit temperatures = 1,200 °F, actual volumetric flow rate (for both stacks) = 1,069,740 acfm. They began commercial operation on May 18, 1971.}

The following conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rates are as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
-003	542	No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **B.13.**
[Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation - Fuels. Only new No. 2 fuel oil shall be fired in this combustion turbine.
[Rule 62-213.410, F.A.C.]

B.4. Hours of Operation. This emissions unit may operate continuously, i.e. 8760 hours/year. The permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation.
[Rules 62-213.440 & 62-210.200(PTE), F.A.C.; and, applicant request in initial Title V application received June 14, 1996.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.5. Visible Emissions. Visible emissions from each turbine shall not be equal to or greater than 20 percent opacity.

[Rule 62-296.320(4)(b)1., F.A.C.; and, AO03-249657.]

B.6. Sulfur Dioxide - Sulfur Content. The sulfur content of the new No. 2 fuel oil shall not exceed 0.5 percent, by weight (see specific condition **B.12.**). The permittee shall maintain a log available for Department inspection of the fuel sulfur content.

[Rule 62-213.440, F.A.C.; AO03-249657; and, applicant request in initial Title V application received June 14, 1996.]

Excess Emissions

B.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

B.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

B.9. Sulfur Dioxide. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific conditions **B.6.** and **B.12.**

[Rule 62-213.440, F.A.C.]

B.10. 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.]

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.11. Visible emissions. The test method for visible emissions shall be EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C.

[Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

B.12. Sulfur Content. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or equivalent.

[Rules 62-213.440 and 62-297.440, F.A.C.]

B.13. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions 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.

[Rules 62-297.310(2) & (2)b., F.A.C.]

B.14. Applicable Test Procedures.

(a) Required Sampling Time.

2. **Opacity Compliance Tests.** When EPA Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2., F.A.C.]

B.15. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;
8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
9. 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.
10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) 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), F.A.C.; and, AO65-242827, Specific Condition #5 (frequency).]

Recordkeeping and Reporting Requirements

B.16. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

B.17. Test Reports.

- (a) 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.
- (b) 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.

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

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Section IV. Acid Rain Part.

Operated by: Gulf power Company
ORIS Code: 643

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions units listed below are regulated under Acid Rain, Phase II.

E.U. ID

<u>No.</u>	<u>Description</u>
-001	Boiler Number 1 - 1,229 MMBtu/hour
-002	Boiler Number 2 - 1,404 MMBtu/hour

1. The Phase II permit application submitted for this facility, as approved by the Department, is a part of this permit (included as an Attachment). The owners and operators of these Phase II acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

a. DEP Form No. 62-210.900(1)(a), dated 07/01/95.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

2. Sulfur dioxide (SO₂) allowance allocations and nitrogen oxide (NO_x) requirements for each Acid Rain unit are as follows:

Description	Year	2000	2001	2002
ID No. 01 Boiler 1	SO₂ allowances, under Table 2, 3, or 4 of 40 CFR 73	6,424*	6,424*	6,424*
	NO_x limit	**	**	
ID No. 02 Boiler 2	SO₂ allowances, under Table 2, 3, or 4 of 40 CFR 73	7,539*	7,539*	7,539*
	NO_x limit	**	**	**

*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.

**By January 1, 1999, this Part will be reopened to add NO_x requirements in accordance with the regulations implementing section 407 of the Clean Air Act.

3. Comments, notes, and justifications: None.

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Appendix E-1, List of Exempt Emissions Units and/or Activities.

Gulf Power Company
Lansing Smith Electric Generating Plant

DRAFT Permit No.: 0050014-001-AV
Facility ID No.: 0050014

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

	<u>State Registration Number</u>	<u>Contents</u>	<u>Size (Gallons)</u>
1.	Tank #1	#2 Diesel - Lighter Oil	25,000
2.	Tank #3	#2 Diesel - CT Fuel Oil	200,000
3.	Tank #4	#2 Diesel - CT Fuel Oil	200,000
4.	Tank #5	#2 Diesel - CT Fuel Oil	200,000
5.	Tank #6	Lube Oil	1,000
6.	Tank #7	Lube Oil	2,100
7.	Tank #8	Lube Oil	581
8.	Tank #9	Lube Oil	560
9.	Tank #10	Lube Oil	560
10.	Tank #11	Lube Oil	560
11.	Tank #12	Lube Oil	560
12.	Tank #13	Lube Oil	6,000
13.	Tank #14	Lube Oil	6,000
14.	Tank #15	Lube Oil	6,000
15.	Tank #16	Sulfuric Acid	4,000
16.	--	Maintenance Area, Used Oil	500
17.	--	Maintenance Area, Used Oil	500
18.	--	Used Oil	300
19.	--	Fire Pump Diesel Fuel (2)	--
20.	--	Chlorine (12)	--
21.	--	Used Oil	250
22.	--	Used Oil	500

Miscellaneous

23. Fire Safety Equipment - Exempted by Rule 62-210.300(3)(a)22., F.A.C.
24. Vacuum Pumps - Exempted by Rule 62-210.300(3)(a)9., F.A.C.
25. Laboratory Equipment - Exempted by Rule 62-210.300(3)(a)15., F.A.C.
26. Welding Equipment - Exempted by Rule 62-210.300(3)(a)16., F.A.C.
27. Gulf Power Company Generated Non-hazardous Boiler Chemical Cleaning Wastes
(Not to exceed 50 gallons per minute)

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Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Gulf Power Company
Lansing Smith Electric Generating Plant

DRAFT Permit No.: 0050014-001-AV
Facility ID No.: 0050014

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘exempt emissions units’.

E.U. ID

No. Brief Description of Emissions Units and/or Activity

- aaa Material Handling of Coal and Ash
- bbb Fugitive PM Sources - On-site Vehicles
- ccc General Purpose Internal Combustion Engines

- aaa Material Handling of Coal and Ash. Fugitive PM emissions generated from the transfer and handling of coal and ash. SCC: 3-05-101-03.

- bbb Fugitive PM Sources. Fugitive PM emissions generated by haul trucks and other on-site vehicles. SCC: 3-05-101-50.

- ccc General Purpose Internal Combustion Engines. located for use at this source are miscellaneous internal combustion engines used to operate the following: welders, compressors, generators, water pumps, sweepers, and other auxiliary equipment.

Appendix H-1, Permit History/ID Number Changes

(For Tracking Purposes Only)

Gulf Power Company
Lansing Smith Electric Generating Plant

Permit No.: 0050014-001-AV
Facility ID No.: 0050014

<u>E.U.</u> <u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration</u> <u>Date</u>	<u>Extended</u> <u>Date</u>	<u>Revised</u> <u>Date(s)</u>
-001	Lansing Smith #1 - Stack	AO03-211310 Secretarial ORDER ¹ Secretarial ORDER ² AC03-2023	04/17/92 10/18/85 12/07/82 02/10/75	04/01/97	05/15/77	
-002	Lansing Smith #2 - Stack	AO03-211310 Secretarial ORDER ¹ Secretarial ORDER ² AC03-2024	04/17/92 10/18/85 12/07/82 02/10/75	04/01/97	05/15/77	
-003	Peaking Turbines A & B	AO03-249657	05/19/94	01/15/96		

ID Number Changes (for tracking purposes):

From: Facility ID No.: 10PCY030014

To: Facility ID No.: 0050014

¹ Secretarial ORDER issued to relax semi-annual PM testing requirement to annual.

² Secretarial ORDER issued to relax quarterly PM testing requirement to semi-annual.

Referenced Attachments

Phase II Acid Rain Application/Compliance Plan

Appendix A-1, Abbreviations, Definitions, Citations, and Identification Numbers

Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)

Appendix TV-1, Title V Conditions(version dated 2/27/97)

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Compliance Requirements

Phase II Acid Rain Permit Application/Compliance Plan

Appendix A-1,
Abbreviations, Definitions, Citations, and Identification Numbers
(Version Dated 2/5/97)

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers (version dated 02/05/97)

Abbreviations and Acronyms:

°F: Degrees Fahrenheit
BACT: Best Available Control Technology
CFR: Code of Federal Regulations
DEP: State of Florida, Department of Environmental Protection
DARM: Division of Air Resource Management
EPA: United States Environmental Protection Agency
F.A.C.: Florida Administrative Code
F.S.: Florida Statute
ISO: International Standards Organization
LAT: Latitude
LONG: Longitude
MMBtu: million British thermal units
MW: Megawatt
ORIS: Office of Regulatory Information Systems
SOA: Specific Operating Agreement
UTM: Universal Transverse Mercator

Citations:

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.

Code of Federal Regulations:

Example: [40 CFR 60.334]

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

Florida Administrative Code (F.A.C.) Rules:

Example: [Rule 62-213, F.A.C.]

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

**Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
(version dated 02/05/97) (continued)**

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where:

105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by state database.

Permit Numbers:

Example: 1050221-002-AV, or
1050221-001-AC

Where:

AC = Air Construction Permit
AV = Air Operation Permit (Title V Source)
105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by permit tracking database
001 or 002 = 3-digit sequential project number assigned by permit tracking database

Example: PSD-FL-185
PA95-01
AC53-208321

Where:

PSD = Prevention of Significant Deterioration Permit
PA = Power Plant Siting Act Permit
AC = old Air Construction Permit numbering

Appendix SS-1,
Stack Sampling Facilities (version dated 10/7/96)

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)

Stack Sampling Facilities Provided by the Owner of an Emissions Unit. This section describes the minimum requirements for stack sampling facilities that are necessary to sample point emissions units. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. Emissions units must provide these facilities at their expense. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

(a) Permanent Test Facilities. The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.

(b) Temporary Test Facilities. The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.

(c) Sampling Ports.

1. All sampling ports shall have a minimum inside diameter of 3 inches.

2. The ports shall be capable of being sealed when not in use.

3. The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.

4. For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.

5. On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.

(d) Work Platforms.

1. Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.

2. On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.

3. On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.

4. All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.

(e) Access to Work Platform.

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)
(continued)

1. Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.

2. Walkways over free-fall areas shall be equipped with safety rails and toeboards.

(f) Electrical Power.

1. A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.

2. If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

(g) Sampling Equipment Support.

1. A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.

a. The bracket shall be a standard 3 inch x 3 inch x one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.

b. A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.

c. The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.

2. A complete monorail or dualrail arrangement may be substituted for the eyebolt and bracket.

3. When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

Appendix TV-1,
Title V Conditions (version dated 2/27/97)

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97)

[Note: This attachment includes "canned conditions" developed from the "Title V Core List."]

{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

Chapter 62-4, F.A.C.

1. General Prohibition. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the Department, unless the source is exempted by Department rule. The Department may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the provisions of Chapter 403, F.S., or the rules promulgated thereunder. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit.

[Rule 62-4.030, Florida Administrative Code (F.A.C.); Section 403.087, Florida Statute (F.S.)]

2. Not federally enforceable. Procedure to Obtain Permits; Application.

(1) Any person desiring to obtain a permit from the Department shall apply on forms prescribed by the Department and shall submit such additional information as the Department by law may require.

(2) All applications and supporting documents shall be filed in quadruplicate with the Department.

(3) To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. All applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except when the application is for renewal of an air pollution operation permit at a minor facility as defined in Rule 62-210.200, F.A.C., or where professional engineering is not required by Chapter 471, F.S. Where required by Chapter 471 or 492, F.S., applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.

(4) Processing fees for air construction permits shall be in accordance with Rule 62-4.050(4), F.A.C.

(5)(a) To be considered by the Department, each application must be accompanied by the proper processing fee. The fee shall be paid by check, payable to the Department of Environmental Protection. The fee is non-refundable except as provided in Section 120.60, F.S., and in this section.

(c) Upon receipt of the proper application fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin.

(d) If the applicant does not submit the required fee within ten days of receipt of written notification, the Department shall either return the unprocessed application or arrange with the applicant for the pick up of the application.

(e) If an applicant submits an application fee in excess of the required fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin upon receipt, and the Department shall refund to the applicant the amount received in excess of the required fee.

(6) Any substantial modification to a complete application shall require an additional processing fee determined pursuant to the schedule set forth in Rule 62-4.050, F.A.C., and shall restart the time requirements of Sections 120.60 and 403.0876, F.S. For purposes of this Subsection, the term "substantial modification" shall mean a modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review.

(7) Modifications to existing permits proposed by the permittee which require substantial changes in the existing permit or require substantial evaluation by the Department of potential impacts of the proposed modifications shall require the same fee as a new application.

[Rule 62-4.050, F.A.C.]

3. Standards for Issuing or Denying Permits. Except as provided at Rule 62-213.460, F.A.C., the issuance of a permit does not relieve any person from complying with the requirements of Chapter 403, F.S., or Department rules.

[Rule 62-4.070(7), F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

4. Modification of Permit Conditions.

(1) For good cause 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. For the purpose of this section, good cause shall include, but not be limited to, any of the following:

- (a) A showing that an improvement in effluent or emission quality or quantity can be accomplished because of technological advances without unreasonable hardship.
- (b) A showing that a higher degree of treatment is necessary to effect the intent and purpose of Chapter 403, F.S.
- (c) A showing of any change in the environment or surrounding conditions that requires a modification to conform to applicable air or water quality standards.
- (e) Adoption or revision of Florida Statutes, rules, or standards which require the modification of a permit condition for compliance.

(2) A permittee may request a modification of a permit by applying to the Department.

(3) A permittee may request that a permit be extended as a modification of the permit. Such a request must be submitted to the Department in writing before the expiration of the permit. Upon timely submittal of a request for extension, unless the permit automatically expires by statute or rule, the permit will remain in effect until final agency action is taken on the request. For construction permits, an extension shall be granted if the applicant can demonstrate reasonable assurances that, upon completion, the extended permit will comply with the standards and conditions required by applicable regulation. For all other permits, an extension shall be granted if the applicant can demonstrate reasonable assurances that the extended permit will comply with the standards and conditions applicable to the original permit. A permit for which the permit application fee was prorated in accordance with Rule 62-4.050(4)(1), F.A.C., shall not be extended. In no event shall a permit be extended or remain in effect longer than the time limits established by statute or rule.

[Rule 62-4.080, F.A.C.]

5. Renewals. Prior to one hundred eighty (180) days before the expiration of a permit issued pursuant to Chapter 62-213, F.A.C., the permittee shall apply for a renewal of a permit using forms incorporated by reference in the specific rule chapter for that kind of permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 180 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department or, if there is court review of the Department's final agency action, until a later date is required by Section 120.60, F.S., provided that, for renewal of a permit issued pursuant to Chapter 62-213, F.A.C., the applicant complies with the requirements of Rules 62-213.420(1)(b)3. and 4., F.A.C.

[Rule 62-4.090(1), F.A.C.]

6. Suspension and Revocation.

(1) Permits shall be effective until suspended, revoked, surrendered, or expired and shall be subject to the provisions of Chapter 403, F.S., and rules of the Department.

(2) Failure to comply with pollution control laws and rules shall be grounds for suspension or revocation.

(3) A permit issued pursuant to Chapter 62-4, F.A.C., shall not become a vested property right in the permittee. The Department may revoke any permit issued by it if it finds that the permit holder or the permit holder's agent:

- (a) Submitted false or inaccurate information in application or operational reports.
- (b) Has violated law, Department orders, rules or permit conditions.
- (c) Has failed to submit operational reports or other information required by Department rules.
- (d) Has refused lawful inspection under Section 403.091, F.S.

[Rule 62-4.100, F.A.C.]

7. **Not federally enforceable.** Financial Responsibility. The Department may require an applicant to submit proof of financial responsibility and may require the applicant to post an appropriate bond to guarantee compliance with the law and Department rules.

[Rule 62-4.110, F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

8. Transfer of Permits.

(1) Within 30 days after the sale or legal transfer of a permitted facility, an "Application for Transfer of Permit" (DEP Form 62-1.201(1)) must be submitted to the Department. This form must be completed with the notarized signatures of both the permittee and the proposed new permittee.

(2) The Department shall approve the transfer of a permit unless it determines that the proposed new permittee cannot provide reasonable assurances that conditions of the permit will be met. The determination shall be limited solely to the ability of the new permittee to comply with the conditions of the existing permit, and it shall not concern the adequacy of these permit conditions. If the Department proposes to deny the transfer, it shall provide both the permittee and the proposed new permittee a written objection to such transfer together with notice of a right to request a Chapter 120, F.S., proceeding on such determination.

(3) Within 30 days of receiving a properly completed Application for Transfer of Permit form, the Department shall issue a final determination. The Department may toll the time for making a determination on the transfer by notifying both the permittee and the proposed new permittee that additional information is required to adequately review the transfer request. Such notification shall be served within 30 days of receipt of an Application for Transfer of Permit form, completed pursuant to Rule 62-4.120(1), F.A.C. If the Department fails to take action to approve or deny the transfer within 30 days of receipt of the completed Application for Transfer of Permit form, or within 30 days of receipt of the last item of timely requested additional information, the transfer shall be deemed approved.

(4) The permittee is encouraged to apply for a permit transfer prior to the sale or legal transfer of a permitted facility. However, the transfer shall not be effective prior to the sale or legal transfer.

(5) Until this transfer is approved by the Department, the permittee and any other person constructing, operating, or maintaining the permitted facility shall be liable for compliance with the terms of the permit. The permittee transferring the permit shall remain liable for corrective actions that may be required as a result of any violations occurring prior to the sale or legal transfer of the facility.

[Rule 62-4.120, F.A.C.]

9. Plant Operation-Problems. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules.

[Rule 62-4.130, F.A.C.]

10. For purposes of notification to the Department pursuant to Rule 62-4.130, F.A.C., Plant Operation-Problems, "immediately" shall mean the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the incident, excluding weekends and holidays.

[40 CFR 70.6(a)(3)(iii)(B)]

11. Review. Failure to request a hearing within 14 days of receipt of notice of proposed or final agency action on a permit application or as otherwise required in Chapter 62-103, F.A.C., shall be deemed a waiver of the right to an administrative hearing.

[Rule 62-4.150, F.A.C.]

12. Permit Conditions. All permits issued by the Department shall include the following general conditions:

(1) The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. 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), F.S., the issuance of this permit does not convey any 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 of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this 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.

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

- (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 F.S. 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 and 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 reasonable times, access to the premises where the permitted activity is located or conducted to:
- (a) Have access to and copy any records that must be kept under 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 reasonable 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 noncompliance; and,
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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 F.S. or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. 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 F.S. after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.
- (11) This permit is transferable only upon Department approval in accordance with Rule 62-4.120, 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.
- (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 for this permit. These materials shall be retained at least five (5) 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 the 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.
- [Rules 62-4.160 and 62-213.440(1)(b), F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

13. Construction Permits.

(1) No person shall construct any installation or facility which will reasonably be expected to be a source of air or water pollution without first applying for and receiving a construction permit from the Department unless exempted by statute or Department rule. In addition to the requirements of Chapter 62-4, F.A.C., applicants for a Department Construction Permit shall submit the following as applicable:

- (a) A completed application on forms furnished by the Department.
- (b) An engineering report covering:
 1. plant description and operations,
 2. types and quantities of all waste material to be generated whether liquid, gaseous or solid,
 3. proposed waste control facilities,
 4. the treatment objectives,
 5. the design criteria on which the control facilities are based, and,
 6. other information deemed relevant.

Design criteria submitted pursuant to Rule 62-4.210(1)(b)5., F.A.C., shall be based on the results of laboratory and pilot-plant scale studies whenever such studies are warranted. The design efficiencies of the proposed waste treatment facilities and the quantities and types of pollutants in the treated effluents or emissions shall be indicated. Work of this nature shall be subject to the requirements of Chapter 471, F.S. Where confidential records are involved, certain information may be kept confidential pursuant to Section 403.111, F.S.

(c) The owners' written guarantee to meet the design criteria as accepted by the Department and to abide by Chapter 403, F.S. and the rules of the Department as to the quantities and types of materials to be discharged from the installation. The owner may be required to post an appropriate bond or other equivalent evidence of financial responsibility to guarantee compliance with such conditions in instances where the owner's financial resources are inadequate or proposed control facilities are experimental in nature.

(2) The construction permit may contain conditions and an expiration date as determined by the Secretary or the Secretary's designee.

(3) When the Department issues a permit to construct, the permittee shall be allowed a period of time, specified in the permit, to construct, and to operate and test to determine compliance with Chapter 403, F.S., and the rules of the Department and, where applicable, to apply for and receive an operation permit. The Department may require tests and evaluations of the treatment facilities by the permittee at his/her expense.

[Rule 62-4.210, F.A.C.]

14. Operation Permit for New Sources. To properly apply for an operation permit for new sources, the applicant shall submit certification that construction was completed noting any deviations from the conditions in the construction permit and test results where appropriate.

[Rule 62-4.220, F.A.C.]

Chapter 62-103, F.A.C.

15. Public Notice, Public Participation, and Proposed Agency Action. The permittee shall comply with all of the requirements for public notice, public participation, and proposed agency action pursuant to Rule 62-103.150 and Rule 62-210.350, F.A.C.

[Rules 62-103.150, 62-210.350 and 62-213.430(1)(b), F.A.C.]

16. Administrative Hearing. The permittee shall comply with all of the requirements for a petition for administrative hearing or waiver of right to administrative proceeding pursuant to Rule 61-103.155, F.A.C.

[Rule 62-103.155, F.A.C.]

Chapter 62-204, F.A.C.

17. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source.

[40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

Chapter 62-210, F.A.C.

18. Permits Required. The owner or operator of any emissions unit which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from the Department prior to beginning construction, modification, or initial or continued operation of the emissions unit unless exempted pursuant to Department rule or statute. All emissions limitations, controls, and other requirements imposed by such permits shall be at least as stringent as any applicable limitations and requirements contained in or enforceable under the State Implementation Plan (SIP) or that are otherwise federally enforceable. Except as provided at Rule 62-213.460, F.A.C., issuance of a permit does not relieve the owner or operator of any emissions unit from complying with applicable emission limiting standards or other requirements of the air pollution rules of the Department, or any other applicable requirements under federal, state, or local law.

(1) Air Construction Permits. An air construction permit shall be obtained by the owner or operator of any proposed new or modified facility or emissions unit prior to the beginning of construction or modification, in accordance with all applicable provisions of Chapters 62-210, 62-212 and 62-4, F.A.C. The construction permit shall be issued for a period of time sufficient to allow construction or modification of the facility or emissions unit and operation while the new or modified facility or emissions unit is conducting tests or otherwise demonstrating initial compliance with the conditions of the construction permit.

(2) Air Operation Permits. Upon expiration of the air operation permit for any existing facility or emissions unit, subsequent to construction or modification and demonstration of initial compliance with the conditions of the construction permit for any new or modified facility or emissions unit, or as otherwise provided in Chapter 62-210 or Chapter 62-213, the owner or operator of such facility or emissions unit shall obtain a renewal air operation permit, an initial air operation permit, or an administrative correction or revision of an existing air operation permit, whichever is appropriate, in accordance with all applicable provisions of Chapter 62-210, Chapter 62-213, and Chapter 62-4, F.A.C.

(a) Minimum Requirements for All Air Operation Permits. At a minimum, a permit issued pursuant to this subsection shall:

1. Specify the manner, nature, volume and frequency of the emissions permitted, and the applicable emission limiting standards or performance standards, if any;
2. Require proper operation and maintenance of any pollution control equipment by qualified personnel, where applicable in accordance with the provisions of any operation and maintenance plan required by the air pollution rules of the Department.
3. Contain an effective date stated in the permit which shall not be earlier than the date final action is taken on the application and be issued for a period, beginning on the effective date, as provided below.
 - a. The operation permit for an emissions unit which is in compliance with all applicable rules and in operational condition, and which the owner or operator intends to continue operating, shall be issued or renewed for a five-year period, except that, for Title V sources subject to Rule 62-213.420(1)(a)1., F.A.C., operation permits shall be extended until 60 days after the due date for submittal of the facility's Title V permit application as specified in Rule 62-213.420(1)(a)1., F.A.C.
 - b. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for six months or more prior to the expiration date of the current operation permit, shall be renewed for a period not to exceed five years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided:
 - (i) the owner or operator of the emissions unit demonstrates to the Department that the emissions unit may need to be reactivated and used, or that it is the owner's or operator's intent to apply to the Department for a permit to construct a new emissions unit at the facility before the end of the extension period; and,
 - (ii) the owner or operator of the emissions unit agrees to and is legally prohibited from providing the allowable emission permitted by the renewed permit as an emissions offset to any other person under Rule 62-212.500, F.A.C.; and,
 - (iii) the emissions unit was operating in compliance with all applicable rules as of the time the source was shut down.
 - c. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for five years or more prior to the expiration date of the current operation permit shall be renewed for a maximum period not to exceed ten years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided the conditions given in Rule 62-210.300(2)(a)3.b., F.A.C., are met and the owner or operator demonstrates to the Department that failure to renew the permit would constitute a hardship, which may include economic hardship.

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

d. The operation permit for an electric utility generating unit on cold standby or long-term reserve shutdown shall be renewed for a five-year period, and additional five-year periods, even if the unit is not maintained in operational condition, provided the conditions given in Rules 62-210.300(2)(a)3.b.(i) through (iii), F.A.C., are met.

4. In the case of an emissions unit permitted pursuant to Rules 62-210.300(2)(a)3.b., c., and d., F.A.C., include reasonable notification and compliance testing requirements for reactivation of such emissions unit and provide that the owner or operator demonstrate to the Department prior to reactivation that such reactivation would not constitute reconstruction pursuant to Rule 62-204.800(7), F.A.C.

[Rules 62-210.300(1) & (2), F.A.C.]

19. Notification of Startup. The owner or operator of any emissions unit or facility which has a valid air operation permit and which has been shut down more than one (1) year, shall notify the Department in writing of the intent to start up such emissions unit or facility, a minimum of sixty (60) days prior to the intended startup date.

(a) The notification shall include the planned startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.

(b) If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Department as soon as possible after the date of such startup is ascertained.

[Rule 62-210.300(5), F.A.C.]

20. Emissions Unit Reclassification.

(a) Any emissions unit whose operation permit has been revoked as provided for in Chapter 62-4, F.A.C., shall be deemed permanently shut down for purposes of Rule 62-212.500, F.A.C. Any emissions unit whose permit to operate has expired without timely renewal or transfer may be deemed permanently shut down, provided, however, that no such emissions unit shall be deemed permanently shut down if, within 20 days after receipt of written notice from the Department, the emissions unit owner or operator demonstrates that the permit expiration resulted from inadvertent failure to comply with the requirements of Rule 62-4.090, F.A.C., and that the owner or operator intends to continue the emissions unit in operation, and either submits an application for an air operation permit or complies with permit transfer requirements, if applicable.

(b) If the owner or operator of an emissions unit which is so permanently shut down, applies to the Department for a permit to reactivate or operate such emissions unit, the emissions unit will be reviewed and permitted as a new emissions unit.

[Rule 62-210.300(6), F.A.C.]

21. Public Notice and Comment.

(1) Public Notice of Proposed Agency Action.

(a) Notwithstanding any discretionary public notice requirements contained in Rule 62-103.150(2)(a), F.A.C., a notice of proposed agency action on permit application, where the proposed agency action is to issue the permit, shall be published by any applicant for:

1. A construction permit for any proposed new or modified facility or emissions unit;
2. An operation permit, permit renewal or permit revision subject to Rule 62-210.300(2)(b), F.A.C.; or
3. An operation permit, permit renewal, or permit revision subject to Chapter 62-213, F.A.C., except those permit revisions meeting the requirements of Rule 62-213.412(1), F.A.C.

(b) The notice required by Rule 62-210.350(1)(a), F.A.C., shall be published in accordance with all otherwise applicable provisions of Rule 62-103.150, F.A.C.

(2) Additional Public Notice Requirements for Emissions Units Subject to Prevention of Significant Deterioration or Nonattainment-Area Preconstruction Review.

(a) Before taking final agency action on a construction permit application for any proposed new or modified facility or emissions unit subject to the preconstruction review requirements of Rule 62-212.400 or 62-212.500, F.A.C., the Department shall comply with all applicable provisions of Rule 62-103.150, F.A.C., and provide an opportunity for public comment which shall include as a minimum the following:

1. A complete file available for public inspection in at least one location in the district affected which includes the information submitted by the owner or operator, exclusive of confidential records under Section 403.111, F.S., and the Department's analysis of the effect of the proposed construction or modification on ambient air quality, including the Department's preliminary determination of whether the permit should be approved or disapproved;
2. A 30-day period for submittal of public comments; and,

3. A notice, by advertisement in a newspaper of general circulation in the county affected, specifying the nature and location of the proposed facility or emissions unit, whether BACT or LAER has been determined, the degree of PSD increment consumption expected, if applicable, and the location of the information specified in paragraph 1. above; and notifying the public of the opportunity for submitting comments and requesting a public hearing.
 - (b) The notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall be prepared by the Department and published by the applicant in accordance with all applicable provisions of Rule 62-103.150, F.A.C., except that the applicant shall cause the notice to be published no later than thirty (30) days prior to final agency action.
 - (c) A copy of the notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall also be sent by the Department to the Regional Office of the U. S. Environmental Protection Agency and to all other state and local officials or agencies having cognizance over the location of such new or modified facility or emissions unit, including local air pollution control agencies, chief executives of city or county government, regional land use planning agencies, and any other state, Federal Land Manager, or Indian Governing Body whose lands may be affected by emissions from the new or modified facility or emissions unit.
 - (d) A copy of the notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall be displayed in the appropriate district, branch and local program offices.
 - (e) An opportunity for public hearing shall be provided in accordance with Chapter 120, F.S., and Rule 62-103.150, F.A.C.
 - (f) Any public comments received shall be made available for public inspection in the location where the information specified in Rule 62-210.350(2)(a)1., F.A.C., is available and shall be considered by the Department in making a final determination to approve or deny the permit.
 - (g) The final determination shall be made available for public inspection at the same location where the information specified in Rule 62-210.350(2)(a)1., F.A.C., was made available.
 - (h) For a proposed new or modified emissions unit which would be located within 100 kilometers of any Federal Class I area or whose emissions may affect any Federal Class I area, and which would be subject to the preconstruction review requirements of Rule 62-212.400, F.A.C., or Rule 62-212.500, F.A.C.:
 1. The Department shall mail or transmit to the Administrator a copy of the initial application for an air construction permit and notice of every action related to the consideration of the permit application.
 2. The Department shall mail or transmit to the Federal Land Manager of each affected Class I area a copy of any written notice of intent to apply for an air construction permit; the initial application for an air construction permit, including all required analyses and demonstrations; any subsequently submitted information related to the application; the preliminary determination and notice of proposed agency action on the permit application; and any petition for an administrative hearing regarding the application or the Department's proposed action. Each such document shall be mailed or transmitted to the Federal Land Manager within fourteen (14) days after its receipt by the Department.
- (3) Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
- (a) Before taking final agency action to issue a new, renewed, or revised air operation permit subject to Chapter 62-213, F.A.C., the Department shall comply with all applicable provisions of Rule 62-103.150, F.A.C., and provide an opportunity for public comment which shall include as a minimum the following:
 1. A complete file available for public inspection in at least one location in the district affected which includes the information submitted by the owner or operator, exclusive of confidential records under Section 403.111, F.S.; and,
 2. A 30-day period for submittal of public comments.
 - (b) The notice provided for in Rule 62-210.350(3)(a), F.A.C., shall be prepared by the Department and published by the applicant in accordance with all applicable provisions of Rule 62-103.150, F.A.C., except that the applicant shall cause the notice to be published no later than thirty (30) days prior to final agency action.
 - (c) The notice shall identify:
 1. The facility;
 2. The name and address of the office at which processing of the permit occurs;
 3. The activity or activities involved in the permit action;
 4. The emissions change involved in any permit revision;
 5. The name, address, and telephone number of a Department representative from whom interested persons may obtain additional information, including copies of the permit draft, the application, and all relevant supporting materials, including any permit application, compliance plan, permit, monitoring report, and compliance statement required pursuant to Chapter 62-213, F.A.C. (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), and all other materials available to the Department that are relevant to the permit decision;
 6. A brief description of the comment procedures required by Rules 62-103.150 and 62-210.350(3), F.A.C.;
 7. The time and place of any hearing that may be held, including a statement of procedure to request a hearing (unless a hearing has already been scheduled); and,

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8. The procedures by which persons may petition the Administrator to object to the issuance of the proposed permit after expiration of the Administrator's 45-day review period.

[Rule 62-210.350, F.A.C.]

22. Administrative Permit Corrections.

(1) A facility owner shall notify the Department by letter of minor corrections to information contained in a permit. Such notifications shall include:

- (a) Typographical errors noted in the permit;
- (b) Name, address or phone number change from that in the permit;
- (c) Any other similar minor administrative change at the source; and,
- (d) A change requiring more frequent monitoring or reporting by the permittee.
- (e) Changes listed at 40 CFR 72.83(a)(1), (2), (6), (9) and (10), hereby adopted and incorporated by reference, to Title V sources subject to emissions limitations or reductions pursuant to 42 USC ss. 7651-7651o;
- (f) Changes listed at 40 CFR 72.83(a)(11), hereby adopted and incorporated by reference, to Title V sources subject to emissions limitations or reductions pursuant to 42 USC ss. 7651-7651o, provided the notification is accompanied by a copy of any EPA determination concerning the similarity of the change to those listed at Rule 17-210.360(1)(e).

(2) Upon receipt of such notifications the Department shall within 60 days correct the permit and provide a corrected copy to the owner.

(3) For facilities subject to Chapter 62-213, F.A.C., a copy shall be provided to EPA and any approved local air program in the county where the facility or any part of the facility is located.

(4) The Department shall incorporate requirements resulting from issuance of new or revised construction permits into existing operation permits issued pursuant to Chapter 62-213, F.A.C., if the construction permit revisions incorporate requirements of federally enforceable preconstruction review and if the applicant requests at the time of application that all of the requirements of Rule 62-213.430(1), F.A.C., be complied with in conjunction with the processing of the construction permit application.

[Rule 62-210.360, F.A.C.]

23. Reports.

(3) Annual Operating Report for Air Pollutant Emitting Facility.

(a) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year.

(c) The annual operating report shall be submitted to the appropriate Department District or Department approved local air pollution control program office by March 1 of the following year unless otherwise indicated by permit condition or Department request.

[Rule 62-210.370(3), F.A.C.]

24. Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.

[Rule 62-210.650, F.A.C.]

25. Forms and Instructions. The forms used by the Department in the stationary source control program are adopted and incorporated by reference in this section. The forms are listed by rule number, which is also the form number, with the subject, title and effective date. Copies of forms may be obtained by writing to the Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

(1) Application for Air Permit - Long Form, Form and Instructions.

- (a) Acid Rain Part (Phase II), Form and Instructions.
 - 1. Repowering Extension Plan, Form and Instructions.
 - 2. New Unit Exemption, Form and Instructions.
 - 3. Retired Unit Exemption, Form and Instructions.

(b) Reserved.

(5) Annual Operating Report (AOR) for Air Pollutant Emitting Facility, Form and Instructions.

[Rule 62-210.900, F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

Chapter 62-213, F.A.C.

26. Annual Emissions Fee. Each Title V source permitted to operate in Florida must pay between January 15 and March 1 of each year, upon written notice from the Department, an annual emissions fee in accordance with Rule 62-213.205, F.A.C., and the appropriate form and associated instructions.

[Rules 62-213.205 and 62-213.900(1), F.A.C.]

27. Annual Emissions Fee. Failure to pay timely any required annual emissions fee, penalty, or interest constitutes grounds for permit revocation pursuant to Rule 62-4.100, F.A.C.

[Rule 62-213.205(1)(g), F.A.C.]

28. Annual Emissions Fee. Any documentation of actual hours of operation, actual material or heat input, actual production amount, or actual emissions used to calculate the annual emissions fee shall be retained by the owner for a minimum of five (5) years and shall be made available to the Department upon request.

[Rule 62-213.205(1)(j), F.A.C.]

29. Annual Emissions Fee. DEP Form 62-213.900(1), F.A.C., "Major Air Pollution Source Annual Emissions Fee Form", must be completed by the permittee and submitted with the annual emissions fee.

[Rule 62-213.205(4), F.A.C.]

30. Air Operation Permit Fees. After December 31, 1992, no permit application processing fee, renewal fee, modification fee or amendment fee is required for an operation permit for a Title V source.

[Rule 62-213.205(5), F.A.C.]

31. Permits and Permit Revisions Required. All Title V sources are subject to the permit requirements of Chapter 62-213, F.A.C.

[Rule 62-213.400, F.A.C.]

32. No Title V source may operate except in compliance with Chapter 62-213, F.A.C.

[Rule 62-213.400(1), F.A.C.]

33. Changes Without Permit Revision. Title V sources having a valid permit issued pursuant to Chapter 62-213, F.A.C., may make the following changes without permit revision, provided that sources shall maintain source logs or records to verify periods of operation in each alternative method of operation:

(1) Permitted sources may change among those alternative methods of operation allowed by the source's permit as provided by the terms of the permit;

(2) Permitted sources may implement the terms or conditions of a new or revised construction permit if;

(a) The application for construction permit complied with the requirements of Rule 62-213.420(3) and (4), F.A.C.;

(b) The terms or conditions were subject to federally enforceable preconstruction review pursuant to Chapter 62-212, F.A.C.; and,

(c) The new or revised construction permit was issued after the Department and the applicant complied with all the requirements of Rule 62-213.430(1), F.A.C.;

(3) A permitted source may implement operating changes after the source submits any forms required by any applicable requirement and provides the Department and EPA with at least 7 days written notice prior to implementation. The source and the Department shall attach each notice to the relevant permit;

(a) The written notice shall include the date on which the change will occur, and a description of the change within the permitted source, the pollutants emitted and any change in emissions, and any term or condition becoming applicable or no longer applicable as a result of the change;

(b) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes;

(4) Permitted sources may implement changes involving modes of operation only in accordance with Rule 62-213.415, F.A.C.

[Rule 62-213.410, F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

34. Immediate Implementation Pending Revision Process.

(1) Those permitted Title V sources making any change that constitutes a modification pursuant to paragraph (a) of the definition of modification at Rule 62-210.200, F.A.C., but which would not constitute a modification pursuant to paragraph (b) of the same definition, may implement such change prior to final issuance of a permit revision in accordance with Rule 62-213.412, F.A.C., provided the change:

- (a) Does not violate any applicable requirement;
- (b) Does not contravene any permit term or condition for monitoring, testing, recordkeeping or reporting, or any compliance certification requirement;
- (c) Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis under the provisions of Chapter 62-212 or 62-296, F.A.C.;
- (d) Does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject including any federally enforceable emissions cap or federally enforceable alternative emissions limit.

(2) A Title V source may immediately implement such changes after they have been incorporated into the terms and conditions of a new or revised construction permit issued pursuant to Chapter 62-212, F.A.C., and after the source provides to EPA, the Department, each affected state and any approved local air program having geographic jurisdiction over the source, a copy of the source's application for operation permit revision. The Title V source may conform its application for construction permit to include all information required by Rule 62-213.420, F.A.C., in lieu of submitting separate application forms.

(3) The Department shall process the application for operation permit revision in accordance with the provisions of Chapter 62-213, F.A.C., except that the Department shall issue a draft permit revision or a determination to deny the revision within 60 days of receipt of a complete application for operation permit revision or, if the Title V source has submitted a construction permit application conforming to the requirements of Rule 62-213.420, F.A.C., the Department shall issue a draft permit or a determination to deny the revision at the same time the Department issues its determination on issuance or denial of the construction permit application. The Department shall not take final action until all the requirements of Rule 62-213.430(1)(a), (c), (d), and (e), F.A.C., have been complied with.

(4) Pending final action on the operation permit revision application, the source shall implement the changes in accordance with the terms and conditions of the source's new or revised construction permit.

(5) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes until after the Department takes final action to issue the operation permit revision.

(6) If the Department denies the source's application for operation permit revision, the source shall cease implementation of the proposed changes.

[Rule 62-213.412, F.A.C.]

35. Permit Applications.

(1) Duty to Apply. For each Title V source, the owner or operator shall submit a timely and complete permit application in compliance with the requirements of Rules 62-213.420, 62-4.050(1) & (2), and 62-210.900, F.A.C.

(a) Timely Application.

3. For purposes of permit renewal, a timely application is one that is submitted in accordance with Rule 62-4.090, F.A.C.

(b) Complete Application.

1. Any applicant for a Title V permit, permit revision or permit renewal must submit an application on DEP Form No. 62-210.900(1), which must include all the information specified by Rule 62-213.420(3), F.A.C., except that an application for permit revision must contain only that information related to the proposed change. The applicant shall include information concerning fugitive emissions and stack emissions in the application. Each application for permit, permit revision or permit renewal shall be certified by a responsible official in accordance with Rule 62-213.420(4), F.A.C.

2. For those applicants submitting initial permit applications pursuant to Rule 62-213.420(1)(a)I., F.A.C., a complete application shall be an application that substantially addresses all the information required by the application form number 62-210.900(1), and such applications shall be deemed complete within sixty days of receipt of a signed and certified application unless the Department notifies the applicant of incompleteness within that time. For all other applicants, the applications shall be deemed complete sixty days after receipt, unless the Department, within sixty days after receipt of a signed application for permit, permit revision or permit renewal, requests additional documentation or information needed to process the application. An applicant making timely and complete application for permit, or timely application for permit renewal as described by Rule 62-4.090(1), F.A.C., shall continue to operate the source

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, provided the applicant complies with all the provisions of Rules 62-213.420(1)(b)3. and 4. F.A.C. Failure of the Department to request additional information within sixty days of receipt of a properly signed application shall not impair the Department's ability to request additional information pursuant to Rules 62-213.420(1)(b)3. and 4., F.A.C.

3. For those permit applications submitted pursuant to the provisions of Rule 62-213.420(1)(a)1., F.A.C., the Department shall notify the applicant if the Department becomes aware at any time during processing of the application that the application contains incorrect or incomplete information. The applicant shall submit the corrected or supplementary information to the Department within ninety days unless the applicant has requested and been granted additional time to submit the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days or such additional time as requested and granted shall render the application incomplete.

4. For all applications other than those addressed at Rule 62-213.420(1)(b)3., F.A.C., should the Department become aware, during processing of any application that the application contains incorrect information, or should the Department become aware, as a result of comment from an affected State, an approved local air program, EPA, or the public that additional information is needed to evaluate the application, the Department shall notify the applicant within 30 days. When an applicant becomes aware that an application contains incorrect or incomplete information, the applicant shall submit the corrected or supplementary information to the Department. If the Department notifies an applicant that corrected or supplementary information is necessary to process the permit, and requests a response, the applicant shall provide the information to the Department within ninety days of the Department request unless the applicant has requested and been granted additional time to submit the information or, the applicant shall, within ninety days, submit a written request that the Department process the application without the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days, or such additional time as requested and granted, or to demand in writing within ninety days that the application be processed without the information shall render the application incomplete. Nothing in this section shall limit any other remedies available to the Department.

[Rules 62-213.420(1)(a)3. and 62-213.420(1)(b)1., 2., 3. & 4., F.A.C.]

36. Confidential Information. Whenever an applicant submits information under a claim of confidentiality pursuant to Section 403.111, F.S., the applicant shall also submit a copy of all such information and claim directly to EPA.

[Rule 62-213.420(2), F.A.C.]

37. Standard Application Form and Required Information. Applications shall be submitted under Chapter 62-213, F.A.C., on forms provided by the Department and adopted by reference in Rule 62-210.900(1), F.A.C. The information as described in Rule 62-210.900(1), F.A.C., shall be included for the Title V source and each emissions unit. An application must include information sufficient to determine all applicable requirements for the Title V source and each emissions unit and to evaluate a fee amount pursuant to Rule 62-213.205, F.A.C.

[Rule 62-213.420(3), F.A.C.]

38. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[Rule 62-213.420(4), F.A.C.]

39.a. Permit Renewal and Expiration. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information identified in Rules 62-210.900(1) and 62-213.420(3), F.A.C. Unless a Title V source submits a timely application for permit renewal in accordance with the requirements of Rule 62-4.090(1), F.A.C., the existing permit shall expire and the source's right to operate shall terminate.

b. Permit Revision Procedures. Permit revisions shall meet all requirements of Chapter 62-213, F.A.C., including those for content of applications, public participation, review by approved local programs and affected states, and review by EPA, as they apply to permit issuance and renewal, except that permit revisions for those activities implemented pursuant to Rule 62-213.412, F.A.C., need not meet the requirements of Rule 62-213.430(1)(b), F.A.C. The Department shall require permit revision in accordance with the provisions of Rule 62-4.080, F.A.C., and 40 CFR 70.7(f), whenever any source becomes

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

subject to any condition listed at 40 CFR 70.7(f)(1), hereby adopted and incorporated by reference. The below requirements from 40 CFR 70.7(f) are adopted and incorporated by reference in Rule 62-213.430(4), F.A.C.:

o 40 CFR 70.7(f): Reopening for Cause.

(1) This section contains provisions from 40 CFR 70.7(f) that specify the conditions under which a Title V permit shall be reopened prior to the expiration of the permit. A Title V permit shall be reopened and revised under any of the following circumstances:

- (i) Additional applicable requirements under the Act become applicable to a major Part 70 source with a remaining permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii).
- (ii) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approved by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- (iii) The permitting authority or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- (iv) The Administrator or the permitting authority determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(2) Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

(3) Reopenings under 40 CFR 70.7(f)(1) shall not be initiated before a notice of such intent is provided to the Part 70 source by the permitting authority at least 30 days in advance of the date that the permit is to be reopened, except that the permitting authority may provide a shorter time period in the case of an emergency.

[Rules 62-213.430(3) & (4), F.A.C.; and, 40 CFR 70.7(f)]

40. Permit Duration. Operation permits for Title V sources may not be extended as provided in Rule 62-4.080(3), F.A.C., if such extension will result in a permit term greater than five (5) years.

[Rule 62-213.440(1)(a), F.A.C.]

41. Monitoring Information. All records of monitoring information shall specify the date, place, and time of sampling or measurement and the operating conditions at the time of sampling or measurement, the date(s) analyses were performed, the company or entity that performed the analyses, the analytical techniques or methods used, and the results of such analyses.

[Rule 62-213.440(1)(b)2.a., F.A.C.]

42. Retention of Records. Retention of records of all monitoring data and support information shall be for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

[Rule 62-213.440(1)(b)2.b., F.A.C.]

43. Monitoring Reports. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports.

[Rule 62-213.440(1)(b)3.a., F.A.C.]

44. Deviation from Permit Requirements Reports. The permittee shall report in accordance with the requirements of Rules 62-210.700(6) and 62-4.130, F.A.C., any deviations from permit requirements, including those attributable to upset conditions as defined in the permit. Reports shall include the probable cause of such deviations, and any corrective actions or preventive measures taken.

[Rule 62-213.440(1)(b)3.b., F.A.C.]

45. Reports. All reports shall be accompanied by a certification by a responsible official, pursuant to Rule 62-213.420(4), F.A.C.

[Rule 62-213.440(1)(b)3.c., F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

46. If any portion of the final permit is invalidated, the remainder of the permit shall remain in effect.
[Rule 62-213.440(1)(d)1., F.A.C.]
47. It shall not be a defense for a permittee in an enforcement action that maintaining compliance with any permit condition would necessitate halting of or reduction of the source activity.
[Rule 62-213.440(1)(d)3., F.A.C.]
48. A Title V source shall comply with all the terms and conditions of the existing permit until the Department has taken final action on any permit renewal or any requested permit revision, except as provided at Rule 62-213.412(2), F.A.C.
[Rule 62-213.440(1)(d)4., F.A.C.]
49. A situation arising from sudden and unforeseeable events beyond the control of the source which causes an exceedance of a technology-based emissions limitation because of unavoidable increases in emissions attributable to the situation and which requires immediate corrective action to restore normal operation, shall be an affirmative defense to an enforcement action in accordance with the provisions and requirements of 40 CFR 70.6(g)(2) and (3), hereby adopted and incorporated by reference.
[Rule 62-213.440(1)(d)5., F.A.C.]
50. Confidentiality Claims. Any permittee may claim confidentiality of any data or other information by complying with Rule 62-213.420(2), F.A.C.
[Rule 62-213.440(1)(d)6., F.A.C.]
51. Statement of Compliance. The permittee shall submit a statement of compliance with all terms and conditions of the permit. Such statement shall be submitted to the Department and EPA annually, or more frequently if specified by Rule 62-213.440(2), F.A.C., or by any other applicable requirement. The statement of compliance shall include the identity of each term or condition of the permit for which each unit has remained in compliance during the period covered by the statement. The statement shall include identification of all methods used to demonstrate compliance and identification of each term or condition of the permit for which any unit has not remained in compliance during the period covered by the statement. For each term or condition for which the source has not remained in compliance during the period covered by the statement, the statement shall also identify each unit not in compliance and each term and condition with which the unit was not in compliance and state the inclusive dates that the source was not in compliance, the actions taken to achieve compliance and the method used to demonstrate compliance. Such statement shall be accompanied by a certification by a responsible official, in accordance with Rule 62-213.420(4), F.A.C.
[Rule 62-213.440(3), F.A.C.]
52. Permit Shield. Except as provided in Chapter 62-213, F.A.C., compliance with the terms and conditions of a permit issued pursuant to Chapter 62-213, F.A.C., shall be deemed compliance with any applicable requirements in effect as of the date of permit issuance, provided that the source included such applicable requirements in the permit application. Nothing in Rule 62-213.460, F.A.C., or in any permit shall alter or affect the ability of EPA or the Department to deal with an emergency, the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance, or the requirements of the Federal Acid Rain Program.
[Rule 62-213.460, F.A.C.]
53. Forms and Instructions. The forms used by the Department in the Title V source operation program are adopted and incorporated by reference in Rule 62-213.900, F.A.C. The form is listed by rule number, which is also the form number, and with the subject, title, and effective date. Copies of forms may be obtained by writing to the Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, or by contacting the appropriate permitting authority.
(1) Major Air Pollution Source Annual Emissions Fee (AEF) Form.
[Rule 62-213.900(1), F.A.C.]

Chapter 62-256, F.A.C.

54. Open Burning. This permit does not authorize any open burning nor does it constitute any waiver of the requirements of Chapter 62-256, F.A.C. Source shall comply with Chapter 62-256, F.A.C., for any open burning at the source.
[Chapter 62-256, F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97) (continued)

Chapter 62-257, F.A.C.

55. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source.

[40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

Chapter 62-281, F.A.C.

56. Refrigerant Requirements. Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed at 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or Class II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts B and F, and with Rule 62-281.100, F.A.C. Those requirements include the following restrictions:

- (1) Any facility having any refrigeration equipment normally containing 50 (fifty) pounds of refrigerant, or more, must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added;
- (2) No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided at 40 CFR 82.34, and properly uses equipment approved pursuant to 40 CFR 82.40;
- (3) No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or Class II substance at 40 CFR 82, Subpart A, Appendices A and B, except in compliance with Rule 62-281.100, F.A.C., and 40 CFR 82.34(B);
- (4) No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or Class II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined at 40 CFR 82.152) for service, maintenance or repair without using equipment certified for that type of appliance pursuant to 40 CFR 82.158 and without observing the practices set forth at 40 CFR 82.156;
- (5) No person may dispose of appliances (except small appliances, as defined at 40 CFR 82.152) without using equipment certified for that type of appliance pursuant to 40 CFR 82.158 and without observing the practices set forth at 40 CFR 82.156;
- (6) No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined at 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82, Subpart F.

[40 CFR 82; and, Chapter 62-281, F.A.C.]

Chapter 62-296, F.A.C.

57. Industrial, Commercial, and Municipal Open Burning Prohibited. Open burning in connection with industrial, commercial, or municipal operations is prohibited, except when:

- (a) Open burning is determined by the Department to be the only feasible method of operation and is authorized by an air permit issued pursuant to Chapter 62-210 or 62-213, F.A.C.; or
- (b) An emergency exists which requires immediate action to protect human health and safety; or
- (c) A county or municipality would use a portable air curtain incinerator to burn yard trash generated by a hurricane, tornado, fire or other disaster and the air curtain incinerator would otherwise be operated in accordance with the permitting exemption criteria of Rule 62-210.300(3), F.A.C.

[Rule 62-296.320(3), F.A.C.]

58. Unconfined Emissions of Particulate Matter.

(4)(c)1. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any emissions unit whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.

2. Reasonable precautions may include, but shall not be limited to the following:

- a. Paving and maintenance of roads, parking areas and yards.
- b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar emissions units.
- d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the emissions unit to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- e. Landscaping or planting of vegetation.
- f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- g. Confining abrasive blasting where possible.
- h. Enclosure or covering of conveyor systems.

[Rules 62-296.320(4)(c)1. & 3., F.A.C.]

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Table 1-1, Summary of Air Pollutant Standards and Terms

Table 1-1, Summary of Air Pollutant Standards and Terms

Gulf Power Company
Lansing Smith Generating Plant

DRAFT Permit No.: 0050014-001-AV
Facility ID No.: 0050014

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of the permit.

E. U. ID No.	Brief Description	Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See Permit Condition(s)
					Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
-001	Boiler #1 (1,229 MMBtu/hour - Coal) (153 MMBtu/hour - Oil)	VE	Coal	8760	40%			N/A	N/A	62-296.405(1)(a)	A.5.
			No. 2 Fuel Oil	8760	40%			N/A	N/A	62-296.405(1)(a)	A.5.
	-Acid Rain Phase II Unit	PM	Coal	8760	0.1 lb/MMBtu	N/A	N/A	122.9	538.3	62-296.405(1)(b)	A.7.
			No. 2 Fuel Oil	8760	0.1 lb/MMBtu	N/A	N/A	15.3	67.0	62-296.405(1)(b)	A.7.
		PM - SB **	Coal	3 hr/day	0.3 lb/MMBtu	N/A	N/A	368.7	672.9	62-210.700(3)	A.8.
			No. 2 Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	45.9	83.8	62-210.700(3)	A.8.
		SO ₂	Coal	8760	6.17 lb/MMBtu	N/A	N/A	7,582.9	33,213.2	62-296.405(1)(c)	A.9.
			No. 2 Fuel Oil	8760	0.5% Sulfur	N/A	N/A	75.8	330.6	Applicant Request	A.10.
-002	Boiler #2 (1,404 MMBtu/hour - Coal) (75.9 MMBtu/hour - Oil)	VE	Coal	8760	40%			N/A	N/A	62-296.405(1)(a)	A.5.
			No. 2 Fuel Oil	8760	40%			N/A	N/A	62-296.405(1)(a)	A.5.
	-Acid Rain Phase II Unit	PM	Coal	8760	0.1 lb/MMBtu	N/A	N/A	140.4	615.0	62-296.405(1)(b)	A.7.
			No. 2 Fuel Oil	8760	0.1 lb/MMBtu	N/A	N/A	7.6	33.2	62-296.405(1)(b)	A.7.
		PM - SB **	Coal	3 hr/day	0.3 lb/MMBtu	N/A	N/A	421.2	768.7	62-210.700(3)	A.8.
			No. 2 Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	22.8	41.6	62-210.700(3)	A.8.
		SO ₂	Coal	8760	6.17 lb/MMBtu	N/A	N/A	3,255.0	14,256.9	62-296.405(1)(c)	A.9.
			No. 2 Fuel Oil	8760	0.5% Sulfur	N/A	N/A	37.6	164.5	Applicant Request	A.10.
-003	Combustion Turbine (542 MMBtu/hour)	VE	No. 2 F.O.	8760	Less than 20%			N/A	N/A	62-296.320(4)(b)	B.5.
		SO ₂	No. 2 F.O.	8760	0.5% sulfur	N/A	N/A	263.6	1,154.7	AO37-242824	B.6.

Notes:

* The "Equivalent Emissions" listed are for informational purposes.

** PM - SB refers to "soot blowing" and "load change".

Table 2-1, Summary of Compliance Requirements

Table 2-1, Summary of Compliance Requirements

Gulf Power Company
Lansing Smith Generating Plant

DRAFT Permit No.: 0050014-001-AV
Facility ID No.: 0050014

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E. U. ID No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time	Frequency Base Date ²	Min. Compliance Test Duration	CMS ¹	See Permit Condition(s)	
					Frequency					
-001	Boiler #1 (1,229 MMBtu/hour - Coal) (153 MMBtu/hour -Oil) -Acid Rain Phase II Unit	VE	Coal	DEP method 9	Annually ³	Sept., 30	60 Minutes	Yes	A.14., 17., 18., 22., 24, 27.-29., 31.-34.	
			No. 2 Fuel Oil	DEP method 9	Annually ³	Sept., 30	60 Minutes	Yes		
		PM	Coal	17, 5, 5B or 5F	Annually ³	Sept., 30	1 Hour	No		A.19., A.24. - 29., 31., 32., 34.
			No. 2 Fuel Oil	17, 5, 5B or 5F	Annually ³	Sept., 30	1 Hour	No		
		SO ₂	Coal	6, 6A, 6B or 6C	Annually ³	Sept., 30	1 Hour	Yes		A.15., 16., 20. - 34.
No. 2 Fuel Oil	Fuel Sampling & Analysis Provided by Vendor				Yes					
-002	Boiler #2 (1,404 MMBtu/hour - Coal) (75.9 MMBtu/hr - Oil) -Acid Rain Phase II Unit	VE	Coal	DEP method 9	Annually ³	Sept., 30	60 Minutes	Yes	A.14., 17., 18., 22., 24, 27.-29., 31.-34.	
			No. 2 Fuel Oil	DEP method 9	Annually ³	Sept., 30	60 Minutes	Yes		
		PM	Coal	17, 5, 5B or 5F	Annually ³	Sept., 30	1 Hour	No		A.19., A.24. - 29., 31., 32., 34.
			No. 2 Fuel Oil	17, 5, 5B or 5F	Annually ³	Sept., 30	1 Hour	No		
		SO ₂	Coal	6, 6A, 6B or 6C	Annually ³	Sept., 30	1 Hour	Yes		A.15., 16., 20. - 34.
No. 2 Fuel Oil	Fuel Sampling & Analysis Provided by Vendor				Yes					
-003	Combustion Turbine A. Combustion Turbine B.	VE	No. 2 F.O.	EPA Method 9	Annually ⁴	10/1 - 11/30	60 Minutes	No	B.10., 11., 13.-17.	
			Natural Gas	EPA Method 9	Annually ⁴	10/1 - 11/30	60 Minutes	No		
		SO ₂	No. 2 F.O.	Fuel Sampling & Analysis Provided by Vendor				No		B.9. & B.12.

Notes:

¹ CMS [=] continuous monitoring system used for compliance in lieu of stack test if marked 'yes'.
(Acceptable as long as CMS is maintained and calibrated as required.)

² Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

³ Test not required in years that liquid and/or solid fuel fired less than 400 hours.

⁴ If a combustion turbine is operated less than 400 hours per year, test is only required once every 5 years, during the year prior to permit renewal.

Gulf Power Company
Lansing Smith Generating Plant
Facility ID No.: 0050014
Bay County

Initial Title V Air Operation Permit
DRAFT Permit No.: 0050014-001-AV

Permitting Authority

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344
Fax: 850/922-6979

*Bruce, 7/28/97
For Review*

Initial Title V Air Operation Permit

DRAFT Permit No.: 0050014-001-AV

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Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

Permittee:

Gulf Power Company
500 Bay Front Parkway
Pensacola, Florida 32520-0100

DRAFT Permit No.: 0050014-001-AV

Facility ID No.: 0050014

SIC Nos.: 49, 4911

Project: Initial Title V Air Operation Permit

This permit is for the operation of the Lansing Smith Generating Plant. This facility is located at 4300 County Road, Bay County; UTM Coordinates: Zone 16, 625.03 km East and 3349.08 km North; Latitude: 30° 16' 08" North and Longitude: 85° 42' 01" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix E-1, List of Exempt Emissions Units and/or Activities
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Phase II Acid Rain Permit Application/Compliance Plan Received December 18, 1995
Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)
Appendix TV-1, Title V Conditions (version dated 2/27/97)

Effective Date: January 1, 1998

Renewal Application Due Date: July 5, 2002

Expiration Date: December 31, 2002

Howard L. Rhodes, Director,
Division of Air Resources Management

HLR/sms/jh

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of two coal fired steam generators (boilers) and one combustion turbine (used to drive a single peaking generator). The two boilers are Acid Rain Phase II 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. Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

The use of 'Permitting Notes' throughout this permit are for informational purposes, only, and are not permit conditions.

Subsection B. Summary of Emissions Unit ID Numbers and Brief Descriptions.

<u>E.U. ID</u>	<u>Brief Description</u>
-001	Boiler Number 1 - 1,229 MMBtu/hour (Phase II Acid Rain Unit)
-002	Boiler Number 2 - 1,404 MMBtu/hour (Phase II Acid Rain Unit)
-003	Combustion Turbine - 542 MMBtu/hour Peaking Unit
-xxx	Unregulated Coal Handling Operations (See Appendix U-1)

Please reference the Permit Number, the Facility Identification Number, and the appropriate Emissions Unit(s) ID Number(s) on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The following documents are part of this permit:

- Appendix E-1, List of Exempt Emissions Units and/or Activities
- Appendix U-1, List of Unregulated Emissions Units and/or Activities
- Phase II Acid Rain Permit Application/Compliance Plan Received December 18, 1995
- Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)
- Appendix TV-1, Title V Conditions (version dated 2/27/97)
- ASP Number 97-B-01

{Permitting Note: The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.}

These documents are provided to the permittee for information purposes only:

Appendix H-1, Permit History / ID Number Transfers

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers (version dated 2/5/97)

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendix TV-1, Title V Conditions (version dated 2/27/97), is a part of this permit.
{Permitting note: Appendix TV-1, Title V Conditions is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68 the permittee shall submit to the implementing agency:
 - a) a risk management plan (RMP) when, and if, such requirement becomes applicable, and
 - b) certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
4. Exempt Emissions Units and/or Activities. Appendix E-1, List of Exempt Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]
6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
{Permitting Note: No vapor emission control devices or systems are deemed necessary nor ordered by the Department as of the issuance date of this permit.}
[Rule 62-296.320(1)(a), F.A.C.]
7. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

8. **Not federally enforceable.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a) Grassing over each section of the ash landfill as it reaches its capacity.
- b) Regular packing of the coal pile to reduce blowing dust and aid in the prevention of coal fires.
- c) Application of a dust suppressant to the coal on the conveyor belts as necessary.

[Rules 62-296.320(4)(c)2., F.A.C.; and, Proposed by applicant in initial Title V permit application received June 14, 1996]

9. The Department's Northwest District Office (Pensacola) telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (850) 413-9911. The Department's Northwest District Office (Pensacola) telephone number for routine business, including compliance test notifications, is (850) 444-8364 during normal working hours.

10. The permittee shall submit all compliance related notifications and reports required by this permit to the Department's Northwest District Office located at 160 Governmental Center, Pensacola, Florida 32501-5794.

Section III. Emissions Units and Conditions.

Subsection A. This section addresses the following emissions units.

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-001	Boiler Number 1 (Phase II Acid Rain Unit)
-002	Boiler Number 2 (Phase II Acid Rain Unit)

Emissions unit number -001 is a tangentially fired, dry bottom boiler designated as “Boiler Number 1”. It is rated at a maximum heat input of 1,229 million Btu per hour (MMBtu/hour) when firing pulverized coal or distillate fuel oil. Emissions unit number -002 is a tangentially fired, dry bottom boiler designated as “Boiler Number 2”. It is rated at a maximum heat input of 1,404 million Btu per hour (MMBtu/hour) when firing pulverized coal or distillate fuel oil. Both units are Phase II Acid Rain Units.

{Permitting notes: These emissions units are regulated under Acid Rain, Phase II. These emissions units pre-date PSD regulations, but are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Fired Steam Generators with more than 250 million Btu per Hour Heat Input. Unit 1: PM emissions are controlled by a hot side (Buell Model # BAL 2X34N333-4-3P) and a cold side (General Electric Model # BE1.2X21(12)30-1.5-1.5-4.2P) electrostatic precipitator. Unit 1 began commercial operation on May 12, 1965. Unit 2: PM emissions are controlled by a hot side (Buell Model # BAL 2X34N333-4-3P) and a cold side (GE-ESI Model # BE2.1X(2-12's)(12)-30-111-4.3P) electrostatic precipitator. Unit 2 began commercial operation on April 9, 1967. Units 1 and 2 share a common stack. Stack height = 199 feet, exit diameter = 18.0 feet, exit temperature = 260 °F, actual volumetric flow rate = 984,400 acfm.}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
-001	1,229	Coal
	153	No. 2 Fuel Oil
	153	On-Specification Used Oil
-002	1,404	Coal
	76	No. 2 Fuel Oil
	76	On-Specification Used Oil

[Rules 62-4.160(2), 62-210.200(PTE) & 62-296.405, F.A.C.; permits AC03-2023 & AC03-2024.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **A.28.**

[Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation - Fuels. The fuels that are allowed to be burned in these boilers are coal and/or new No. 2 fuel oil and/or on-specification used oil (see specific condition **A.36.**). Fuel oil is only used for periods of start-up and as needed for flame stabilization. Also, on-site generated "oil contaminated soil" is periodically combusted for energy recovery purposes.
[Rule 62-213.410, F.A.C.; and, Applicant's request in initial Title V permit application dated June 14, 1996.]

A.4. Hours of Operation. These emissions units may operate continuously, i.e. 8760 hours/year. For each emissions unit, the permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation, including a detailed account of the hours operated on each of the allowable fuels.
[Rules 62-213.440 & 62-210.200(PTE), F.A.C.; and, Applicant's request in initial Title V application received June 14, 1996.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. Visible Emissions. Visible emissions shall not exceed 40 percent opacity. Because units 1 and 2 share a common stack, visible emissions violations from the stack will be attributed to both units unless opacity meter results show the specific unit causing the violation.
[Rule 62-296.405(1)(a), F.A.C.; and, Secretarial ORDER(s) signed October 18, 1985, and December 1, 1982; and, AO03-211310, Specific Condition 10.]

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6)-minute periods, during the 3-hour period of excess emissions allowed for boiler cleaning and load changes, at units which have installed continuous opacity monitors.

[Rule 62-210.700(3), F.A.C.]

A.7. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.
[Rule 62-296.405(1)(b), F.A.C.]

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

[Rule 62-210.700(3), F.A.C.]

A.9. Sulfur Dioxide - Solid Fuel. When burning solid fuel, sulfur dioxide emissions shall not exceed 6.17 pounds per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(c)2.d., F.A.C.]

A.10. Sulfur Dioxide - Sulfur Content. The No. 2 fuel oil sulfur content shall not exceed 0.5 percent, by weight, as measured by applicable test methods.

[Applicant request in initial Title V permit application received June 14, 1996.]

Excess Emissions

A.11. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

A.12. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.]

A.13. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

{Permitting Note: In accordance with the Acid Rain Phase II requirements, the following continuous monitors are installed on these units: SO₂, NO_x, CO₂ and stack gas Flow.}

A.14. Continuous Monitors. These emissions units shall have installed, and shall maintain, continuous monitoring systems for monitoring opacity and CO₂.

[Rule 62-405(1)(f)1., F.A.C.]

A.15. Sulfur Dioxide. Those emissions units not having an operating flue gas desulfurization device may monitor sulfur dioxide emissions by fuel sampling and analysis according to methods approved by the EPA. **The permittee elected to demonstrate compliance using the SO₂ continuous emissions monitor installed in accordance with 40 CFR 75. In addition, compliance with the liquid fuel sulfur limit will be verified by a fuel analysis provided by the vendor upon each fuel delivery (see specific condition A.24.).**

[Rule 62-296.405(1)(f)1.b., F.A.C.]

A.16. 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.]

Required Tests, Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.17. Visible Emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. **The Permittee has elected to utilize a transmissometer (opacity meter) for demonstrating compliance with the visible emissions limit.**

[Rules 62-213.440 and 62-296.405(1)(e)1., F.A.C.]

A.18. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
 - a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
 - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding

the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rules 62-297.310, and 62-297.401, F.A.C.]

A.19. Particulate Matter. The test methods for particulate matter emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-213.440, 62-296.405(1)(e)2., 62-297.310, and 62-297.401, F.A.C.]

A.20. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, the permittee has elected to demonstrate compliance using the SO₂ continuous emissions monitor installed in accordance with 40 CFR 75.**

[Rules 62-213.440, 62-296.405(1)(e)3., & 62-297.310, 62-297.401, F.A.C.; and, AO03-211310]

A.21. Continuous SO₂ emissions monitoring 24-hour averages are required to demonstrate compliance with the standards of the Department. A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emissions standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the permittee has verified the problem or no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO₂ emissions compliance by the temporary use of a spare SO₂ emissions monitor. The spare SO₂ emissions monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

Maintain a QC program. At a minimum, the QC program must include written procedures which shall describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. CD determination and adjustment of CEMS.
3. Preventative maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling-and analysis methods.

6. Program of corrective action for malfunctioning CEMS.
[Rule 62-213.440, F.A.C.; and, AO03-211310.]

A.22. Continuous Monitor Performance Specifications. If continuous monitoring systems are required by rule or are elected by the permittee to be used for demonstrating compliance with the standards of the Department, they must be installed, maintained and calibrated in accordance with the EPA performance specifications listed below. These Performance Specifications are contained in 40 CFR 60, Appendix B, and are adopted by reference in Rule 62-204.800, F.A.C.

- (1) Performance Specification 1--Specifications and Test Procedures for Opacity Continuous Emission Monitoring Systems in Stationary Sources.
- (2) Performance Specification 2--Specifications and Test Procedures for SO₂ and NO_x Continuous Emission Monitoring Systems in Stationary Sources.
- (3) Performance Specification 3--Specifications and Test Procedures for O₂ and CO₂ Continuous Emission Monitoring Systems in Stationary Sources.

[Rule 62-297.520, F.A.C.]

A.23. The following fuel sampling and analysis protocol shall be used as an alternate sampling procedure authorized by permit to demonstrate compliance with the sulfur dioxide standard in the event that the SO₂ continuous emissions monitor is not able to capture valid data:

- a. Determine and record the as-fired fuel sulfur content, percent by weight, for liquid fuels using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or *the latest edition* equivalent, to analyze a representative sample of the blended fuel following each fuel delivery.
- b. Determine and record the as-fired fuel sulfur content, percent by weight, for coal using ASTM D2013-72 and either ASTM D3177-75 or ASTM D4239-85, or *the latest edition* equivalent, to analyze a representative sample of the blended as-fired pulverized coal.
- c. Determine and record the density (using ASTM D 1298-80, or *the latest edition* equivalent) and the calorific heat value in Btu per pound (using ASTM D 240-76, or *the latest edition* equivalent) of the fuel oil combusted.
- d. Determine and record the calorific heat value in Btu per pound of the blended, as-fired pulverized coal using ASTM D2013-72 and either ASTM D2015-77 or D3286-(latest version), or *the latest edition* equivalent.
- e. Record daily the amount of each fuel fired, the density of the fuel oil, the heating value of each fuel fired, and the percent sulfur content, by weight, of each fuel fired.
- f. Utilize the information in a., b., c., d. and e., above, to calculate the SO₂ emission rate to ensure compliance at all times.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

~~**A.24.** The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or *the latest edition* equivalent. **Compliance with the liquid fuel sulfur limit established in specific condition 10. shall be verified with a fuel analysis provided by the vendor upon each fuel oil delivery.**~~

~~[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. & 62-297.440, F.A.C.]~~

A.25. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;
 - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
 - c. Each NESHAP pollutant, if there is an applicable emission standard.
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.
9. 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.
10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) 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.

- (c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.]

Compliance Test Requirements

A.26. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

A.27. 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 the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

A.28. Operating Rate During Testing. Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity as defined below. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load 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.

(b) All Other Sources. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.

[Rule 62-297.310(2), F.A.C.]

A.29. Applicable Test Procedures.

(a) Required Sampling Time.

1. 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.
2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
 - b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
 - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

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

TABLE 297.310-1
CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		Comparison check	5%

A.30. 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.]

Recordkeeping and Reporting Requirements

{Permitting Note: The reports that are required by the following conditions are to be sent to the Northwest District office, 160 Governmental Center, Pensacola, Florida 322501-5794}

A.31. The owner or operator shall maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. These records must be of sufficient detail to determine compliance with the allowable sulfur dioxide emission limitations.

[Rules 62-213.440 & 62-4.070(3), F.A.C.]

A.32. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

A.33. Submit to the Department a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

A.34. A maintenance log of the continuous monitoring systems shall be kept showing:

- a. Time out of service.
- b. Calibration and adjustments.

[Rule 62-213.440, F.A.C.; and, AO03-211310, specific condition 8.]

A.35. Test Reports.

- (a) 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.
- (b) 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.
- (c) 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.
 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.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

Miscellaneous Conditions.

A.36. Used Oil. Burning of on-specification used oil is allowed in this emissions unit in accordance with all other conditions of this permit and the following conditions:

- a. **On-specification Used Oil Emissions Limitations:** This emissions unit is permitted to burn on-specification used oil, which contains a PCB concentration of less than 50 ppm. On-specification used oil is defined as used oil that meets the specifications of 40 CFR 279 - Standards for the Management of Used Oil, listed below. "Off-specification" used oil shall not be burned. Used oil which fails to comply with any of these specification levels is considered "off-specification" used oil.

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash point	100 degrees F minimum

- b. **Quantity Limitation:** This emissions unit is permitted to burn "on-specification" used oil that is generated by Gulf Power, not to exceed 50,000 gallons per calendar year in each boiler (1 & 2).
- c. **PCB Limitation:** Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement.
- d. **Operational Requirements:** On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.
- e. **Testing Requirements:** The owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs.

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

- f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
- (1) The gallons of on-specification used oil generated and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
 - (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
 - (3) Results of the analyses required above.
- [40 CFR 279.61 and 761.20(e)]
- g. Reporting Requirements: The owner or operator shall submit to the Northwest District office, within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

The owner or operator shall submit, with the Annual Operation Report form, the analytical results and the total amount of on-specification used oil burned during the previous calendar year.

[Rule 62-4.070(3) and 62-213.440, F.A.C., 40 CFR 279 and 40 CFR 761, unless otherwise noted.]

Subsection B. This section addresses the following emissions unit(s).

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-003	Combustion Turbines A & B

Emissions unit number -003 is two simple cycle combustion turbines manufactured by Pratt and Whitney that are used as a peaking units. It consists of a single engine used to drive two combustion turbines designated as turbine A & turbine B. Each combustion turbine is connected to a separate generator. The engine is rated at a maximum heat input of 542 million Btu per hour (MMBtu/hour) while being fueled by No. 2 fuel oil with a maximum sulfur content of 0.5%, by weight. Emissions from these combustion turbines are uncontrolled.

{Permitting notes: This emissions unit is regulated under Rule 62-210.300, F.A.C., Permits Required. These turbines are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. Each combustion turbine has its own stack. Stack heights = 33 feet, exit diameters = 13.7 feet, exit temperatures = 1,200 °F, actual volumetric flow rate (for both stacks) = 1,069,740 acfm. They began commercial operation on May 18, 1971.}

The following conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rates are as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
-003	542	No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **B.13**.
[Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation - Fuels. Only new No. 2 fuel oil shall be fired in this combustion turbine.
[Rule 62-213.410, F.A.C.]

B.4. Hours of Operation. This emissions unit may operate continuously, i.e. 8760 hours/year. The permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation.
[Rules 62-213.440 & 62-210.200(PTE), F.A.C.; and, applicant request in initial Title V application received June 14, 1996.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.5. Visible Emissions. Visible emissions from each turbine shall not be equal to or greater than 20 percent opacity.

[Rule 62-296.320(4)(b)1., F.A.C.; and, AO03-249657.]

B.6. Sulfur Dioxide - Sulfur Content. The sulfur content of the new No. 2 fuel oil shall not exceed 0.5 percent, by weight (see specific condition **B.12.**). The permittee shall maintain a log available for Department inspection of the fuel sulfur content.

[Rule 62-213.440, F.A.C.; AO03-249657; and, applicant request in initial Title V application received June 14, 1996.]

Excess Emissions

B.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

B.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

B.9. Sulfur Dioxide. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific conditions **C.6.** and **B.12.**

[Rule 62-213.440, F.A.C.]

B.10. 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.]

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.11. Visible emissions. The test method for visible emissions shall be EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C.

[Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

B.12. Sulfur Content. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or equivalent.

[Rules 62-213.440 and 62-297.440, F.A.C.]

B.13. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions 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.

[Rules 62-297.310(2) & (2)b., F.A.C.]

B.14. Applicable Test Procedures.

(a) Required Sampling Time.

2. **Opacity Compliance Tests.** When EPA Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2., F.A.C.]

B.15. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;
8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
9. 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.
10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) 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), F.A.C.; and, AO65-242827, Specific Condition #5 (frequency).]

Recordkeeping and Reporting Requirements

B.17. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

B.18. Test Reports.

- (a) 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.
- (b) 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.

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

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Section IV. Acid Rain Part.

Operated by: Gulf power Company
ORIS Code: 643

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions units listed below are regulated under Acid Rain, Phase II.

E.U. ID

<u>No.</u>	<u>Description</u>
-001	Boiler Number 1 - 1,229 MMBtu/hour
-004	Boiler Number 2 - 1,404 MMBtu/hour

1. The Phase II permit application submitted for this facility, as approved by the Department, is a part of this permit (included as an Attachment). The owners and operators of these Phase II acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

a. DEP Form No. 62-210.900(1)(a), dated 07/01/95.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

2. Sulfur dioxide (SO₂) allowance allocations and nitrogen oxide (NO_x) requirements for each Acid Rain unit are as follows:

Description	Year	2000	2001	2002
ID No. 01 Boiler 1	SO₂ allowances, under Table 2, 3, or 4 of 40 CFR 73	6,424*	6,424*	6,424*
	NO_x limit	**	**	
ID No. 04 Boiler 2	SO₂ allowances, under Table 2, 3, or 4 of 40 CFR 73	7,539*	7,539*	7,539*
	NO_x limit	**	**	**

*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.

**By January 1, 1999, this Part will be reopened to add NO_x requirements in accordance with the regulations implementing section 407 of the Clean Air Act.

3. Comments, notes, and justifications: None.

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Appendix E-1, List of Exempt Emissions Units and/or Activities.

Gulf Power Company
Lansing Smith Generating Plant

DRAFT Permit No.: 0050014-001-AV
Facility ID No.: 0050014

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

	<u>State Registration Number</u>	<u>Contents</u>	<u>Size (Gallons)</u>
1.	Tank #1	#2 Diesel - Lighter Oil	25,000
2.	Tank #3	#2 Diesel - CT Fuel Oil	200,000
3.	Tank #4	#2 Diesel - CT Fuel Oil	200,000
4.	Tank #5	#2 Diesel - CT Fuel Oil	200,000
5.	Tank #6	Lube Oil	1,000
6.	Tank #7	Lube Oil	2,100
7.	Tank #8	Lube Oil	581
8.	Tank #9	Lube Oil	560
9.	Tank #10	Lube Oil	560
10.	Tank #11	Lube Oil	560
11.	Tank #12	Lube Oil	560
12.	Tank #13	Lube Oil	6,000
13.	Tank #14	Lube Oil	6,000
14.	Tank #15	Lube Oil	6,000
15.	Tank #16	Sulfuric Acid	4,000
16.	--	Maintenance Area, Used Oil	500
17.	--	Maintenance Area, Used Oil	500
18.	--	Used Oil	300
19.	--	Fire Pump Diesel Fuel (2)	--
20.	--	Chlorine (12)	--
21.	--	Used Oil	250
22.	--	Used Oil	500

Miscellaneous

23. Fire Safety Equipment - Exempted by Rule 62-210.300(3)(a)22., F.A.C.
24. Vacuum Pumps - Exempted by Rule 62-210.300(3)(a)9., F.A.C.
25. Laboratory Equipment - Exempted by Rule 62-210.300(3)(a)15., F.A.C.
26. Welding Equipment - Exempted by Rule 62-210.300(3)(a)16., F.A.C.
27. Gulf Power Company Generated Non-hazardous Boiler Chemical Cleaning Wastes
(Not to exceed 50 gallons per minute)

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Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Gulf Power Company
Lansing Smith Generating Plant

DRAFT Permit No.: 0050014-001-AV
Facility ID No.: 0050014

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘exempt emissions units’.

E.U. ID

No. Brief Description of Emissions Units and/or Activity

- aaa Material Handling of Coal and Ash
- bbb Fugitive PM Sources - On-site Vehicles
- ccc General Purpose Internal Combustion Engines

- aaa Material Handling of Coal and Ash. Fugitive PM emissions generated from the transfer and handling of coal and ash. SCC: 3-05-101-03.

- bbb Fugitive PM Sources. Fugitive PM emissions generated by haul trucks and other on-site vehicles. SCC: 3-05-101-50.

- ccc General Purpose Internal Combustion Engines. located for use at this source are miscellaneous internal combustion engines used to operate the following: welders, compressors, generators, water pumps, sweepers, and other auxiliary equipment.

Appendix H-1, Permit History/ID Number Changes

(For Tracking Purposes Only)

Gulf Power Company
Lansing Smith Plant

Permit No.: 0050014-001-AV
Facility ID No.: 0050014

E.U.								
<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>	<u>MW Output</u>	<u>Heat Input (MMBtu/hr)</u>
-001	Lansing Smith #1 - Stack	AO03-211310	04/17/92	04/01/97			175	(1,768) ^{1,2}
		AO03-134885	07/09/87	06/01/92			175	(1,768) ^{1,2}
		AO03-56886	07/15/82	07/01/87			175	(1,566) ^{1,3}
		Secretarial ORDER ⁴	10/18/85					
		Secretarial ORDER ⁵	12/07/82					
		AO03-2031	08/17/77	08/17/82			N/S	1,556
		AC03-2023	02/10/75	01/01/77	05/15/77		N/S	1,229
-002	Lansing Smith #2 - Stack	AO-3-1133	01/29/73	12/15/74			130	1,300
		AO03-211310	04/17/92	04/01/97			205	(2,042) ^{1,2}
		AO03-134887	07/09/87	06/01/92			205	(2,042) ^{1,2}
		AO03-56888	07/15/82	07/01/87			205	(1,974) ^{1,3}
		Secretarial ORDER ⁴	10/18/85					
		Secretarial ORDER ⁵	12/07/82					
		AO03-7636	03/22/78	03/22/83			N/S	1,924
AC03-2024	02/10/75	01/01/77	05/15/77		N/S	1,404		
AO-3-1132	01/29/73	12/15/74			140.75	1,406		
-003	Peaking Turbines	AO03-249657	05/19/94	01/15/96				

ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 10PCY030014

To: **Facility ID No.:** 0050014

¹ Number in parenthesis indicates number reported in application, not specified in the permit.

² "Maximum allowable heat input is that heat input necessary to maintain electrical load output at 110% of the level at which the most recent successful particulate matter compliance test was conducted."

³ "Maximum allowable heat input is that heat input necessary to maintain electrical load output at the level at which the most recent successful quarterly particulate matter test was conducted."

⁴ Secretarial ORDER issued to relax semi-annual PM testing requirement to annual.

⁵ Secretarial ORDER issued to relax quarterly PM testing requirement to semi-annual.

Referenced Attachments

Phase II Acid Rain Application/Compliance Plan

Appendix A-1, Abbreviations, Definitions, Citations, and Identification Numbers

Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)

Appendix TV-1, Title V Conditions(version dated 2/27/97)

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Compliance Requirements

Gulf Power Company
Lansing Smith Generating Plant
Facility ID No.: 0050014
Bay County

Initial Title V Air Operation Permit
DRAFT Permit No.: 0050014-001-AV

Permitting Authority

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344
Fax: 850/922-6979

Initial Title V Air Operation Permit

DRAFT Permit No.: 0050014-001-AV

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Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

Permittee:

Gulf Power Company
500 Bay Front Parkway
Pensacola, Florida 32520-0100

DRAFT Permit No.: 0050014-001-AV

Facility ID No.: 0050014

SIC Nos.: 49, 4911

Project: Initial Title V Air Operation Permit

This permit is for the operation of the Lansing Smith Generating Plant. This facility is located at 4300 County Road, Bay County; UTM Coordinates: Zone 16, 625.03 km East and 3349.08 km North; Latitude: 30° 16' 08" North and Longitude: 85° 42' 01" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix E-1, List of Exempt Emissions Units and/or Activities
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Phase II Acid Rain Permit Application/Compliance Plan Received December 18, 1995
Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)
Appendix TV-1, Title V Conditions (version dated 2/27/97)

Effective Date: January 1, 1998

Renewal Application Due Date: July 5, 2002

Expiration Date: December 31, 2002

Howard L. Rhodes, Director,
Division of Air Resources Management

HLR/sms/jh

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of two coal fired steam generators (boilers) and one combustion turbine (used to drive a single peaking generator). The two boilers are Acid Rain Phase II 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. Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

The use of 'Permitting Notes' throughout this permit are for informational purposes, only, and are not permit conditions.

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

<u>E.U. ID</u>	<u>Brief Description</u>
-001	Boiler Number 1 - 1,229 MMBtu/hour (Phase II Acid Rain Unit)
-002	Boiler Number 2 - 1,404 MMBtu/hour (Phase II Acid Rain Unit)
-003	Combustion Turbine - 542 MMBtu/hour Peaking Unit
-xxx	Unregulated Coal Handling Operations (See Appendix U-1)

Please reference the Permit Number, the Facility Identification Number, and the appropriate Emissions Unit(s) ID Number(s) on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The following documents are part of this permit:

- Appendix E-1, List of Exempt Emissions Units and/or Activities
- Appendix U-1, List of Unregulated Emissions Units and/or Activities
- Phase II Acid Rain Permit Application/Compliance Plan Received December 18, 1995
- Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)
- Appendix TV-1, Title V Conditions (version dated 2/27/97)
- ASP Number 97-B-01

{Permitting Note: The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.}

These documents are provided to the permittee for information purposes only:

Appendix H-1, Permit History / ID Number Transfers

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers (version dated 2/5/97)

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendix TV-1, Title V Conditions (version dated 2/27/97), is a part of this permit.

{Permitting note: Appendix TV-1, Title V Conditions is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

[Rule 62-296.320(2), F.A.C.]

3. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68 the permittee shall submit to the implementing agency:

- a) a risk management plan (RMP) when, and if, such requirement becomes applicable, and
- b) certification forms and/or RMPs according to the promulgated rule schedule.

[40 CFR 68]

4. Exempt Emissions Units and/or Activities. Appendix E-1, List of Exempt Emissions Units and/or Activities, is a part of this permit.

[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.

[Rule 62-213.440(1), F.A.C.]

6. → General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

{Permitting Note: No vapor emission control devices or systems are deemed necessary nor ordered by the Department as of the issuance date of this permit.}

[Rule 62-296.320(1)(a), F.A.C.]

7. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9

[Rule 62-296.320(4)(b)1., F.A.C.] is the method of compliance pursuant to Chapter 62-297, F.A.C.

§ 4.

8. **Not federally enforceable.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a) Grassing over each section of the ash landfill as it reaches its capacity.
- b) Regular packing of the coal pile to reduce blowing dust and aid in the prevention of coal fires.
- c) Application of a dust suppressant to the coal on the conveyor belts as necessary.

[Rule 62-296.320(4)(c)2., F.A.C.; Proposed by applicant in initial Title V permit application received June 14, 1996]

9. **Not federally enforceable.** The Department's Northwest District Office (Pensacola) telephone number for reporting problems, malfunctions or exceedances under this permit is ~~(904)~~ 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is ~~(904)~~ 413-9911. The Department's Northwest District Office (Pensacola) telephone number for routine business, including compliance test notifications, is ~~(904)~~ 444-8364 during normal working hours.

10. **Not federally enforceable.** The permittee shall submit all compliance related notifications and reports required by this permit to the Department's Northwest District Office located at 160 Governmental Center, Pensacola, Florida 32501-5794.

Section III. Emissions Units and Conditions.

Subsection A. This section addresses the following emissions units.

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-001	Boiler Number 1 (Phase II Acid Rain Unit)
-002	Boiler Number 2 (Phase II Acid Rain Unit)

Emissions unit number 1 is a tangentially fired, dry bottom boiler designated as “Boiler Number 1”. It is rated at a maximum heat input of 1,229 million Btu per hour (MMBtu/hour) when firing pulverized coal or distillate fuel oil. Emissions unit number 2 is a tangentially fired, dry bottom boiler designated as “Boiler Number 2”. It is rated at a maximum heat input of 1,404 million Btu per hour (MMBtu/hour) when firing pulverized coal or distillate fuel oil. Both units are Phase II Acid Rain Units.

{Permitting notes: These emissions units are regulated under Acid Rain, Phase II. These emissions units pre-date PSD regulations, but are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Fired Steam Generators with more than 250 million Btu per Hour Heat Input. Unit 1: PM emissions are controlled by a hot side (Buell Model # BAL 2X34N333-4-3P) and a cold side (General Electric Model # BE1.2X21(12)30-1.5-1.5-4.2P) electrostatic precipitator. Unit 1 began commercial operation on May 12, 1965. Unit 2: PM emissions are controlled by a hot side (Buell Model # BAL 2X34N333-4-3P) and a cold side (GE-ESI Model # BE2.1X(2-12’s)(12)-30-111-4.3P) electrostatic precipitator. Unit 2 began commercial operation on April 9, 1967. Units 1 and 2 share a common stack. Stack height = 199 feet, exit diameter = 18.0 feet, exit temperature = 260 °F, actual volumetric flow rate = 984,400 acfm.}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
-001	1,229	Coal
	1,229	No. 2 Fuel Oil
	1,229	On-Specification Used Oil
-002	1,404	Coal
	1,404	No. 2 Fuel Oil
	1,404	On-Specification Used Oil

[Rules 62-4.160(2), 62-210.200(PTE) & 62-296.405, F.A.C.; permits AC03-2023 & AC03-2024.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **A.28.**

[Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation - Fuels. The fuels that are allowed to be burned in these boilers are coal and/or new No. 2 fuel oil and/or on-specification used oil (see specific condition **A.36.**).
[Rule 62-213.410, F.A.C.; and, Applicant's request in initial Title V permit application dated June 14, 1996.]

A.4. Hours of Operation. These emissions units may operate continuously, i.e. 8760 hours/year. For each emissions unit, the permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation, including a detailed account of the hours operated on each of the allowable fuels.
[Rule 62-210.200(PTE), F.A.C.; and, Applicant's request in initial Title V application received June 14, 1996.] *62-213.440*

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. Visible Emissions. Visible emissions shall not exceed 40 percent opacity. Because units 1 and 2 share a common stack, visible emissions violations from the stack will be attributed to both units unless opacity meter results show the specific unit causing the violation.
[Rule 62-296.405(1)(a), F.A.C.; and, Secretarial ORDER(s) signed October 18, 1985, and December 1, 1982; and, AO03-211310, Specific Condition 10.]

A.6. Visible Emissions - Soot Blowing and Load Change. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.
A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.
Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6)-minute periods, during the 3-hour period of excess emissions allowed for boiler cleaning and load changes, at units which have installed continuous opacity monitors.
[Rule 62-210.700(3), F.A.C.]

A.7. Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods.
[Rule 62-296.405(1)(b), F.A.C.]

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.
[Rule 62-210.700(3), F.A.C.]

A.9. Sulfur Dioxide - Solid Fuel. When burning solid fuel, sulfur dioxide emissions shall not exceed 6.17 pounds per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(c)2.d., F.A.C.]

A.10. Sulfur Dioxide - Liquid Fuel. When burning 100% liquid fuel, sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods.

[Rule 62-296.405(1)(c)1.j., F.A.C.]

A.11. Sulfur Dioxide - Sulfur Content. The No. 2 fuel oil sulfur content shall not exceed 0.5 percent, by weight, as measured by applicable test methods.

[Applicant request in initial Title V permit application received June 14, 1996.]

Excess Emissions

A.12. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

A.13. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.]

A.14. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

{Permitting Note: In accordance with the Acid Rain Phase II requirements, the following continuous monitors are installed on this unit's SO₂, NO_x, CO₂ and stack gas Flow.}

A.15. Continuous Monitors. These emissions units shall have installed, and shall maintain, continuous monitoring systems for monitoring opacity and CO₂.

[Rule 62-405(1)(f)1., F.A.C.]

A.16. Sulfur Dioxide. Those emissions units not having an operating flue gas desulfurization device may monitor sulfur dioxide emissions by fuel sampling and analysis according to methods approved by the EPA. **The permittee elected to demonstrate compliance using the SO₂ continuous emissions monitor installed in accordance with 40 CFR 75. In addition, compliance with the liquid fuel sulfur limit will be verified by a fuel analysis provided by the vendor upon each fuel delivery (see specific condition A.21.).**

[Rule 62-296.405(1)(f)1.b., F.A.C.]

A.17. 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.]

Required Tests, Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.18. Visible Emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C.

[Rules 62-213.440 and 62-296.405(1)(e)1., F.A.C.]

A.19. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

- a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
- b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rules 62-297.310, and 62-297.401, F.A.C.]

A.20. Particulate Matter. The test methods for particulate matter emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-213.440, 62-296.405(1)(e)2., 62-297.310, and 62-297.401, F.A.C.]

A.21. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, the permittee has elected to demonstrate compliance using the SO₂ continuous emissions monitor installed in accordance with 40 CFR 75.**

[Rules 62-213.440, 62-296.405(1)(e)3., & 62-297.310, 62-297.401, F.A.C.]

A.22. Continuous SO₂ emissions monitoring 24-hour averages are required to demonstrate compliance with the standards of the Department. A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emissions standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the permittee has verified the problem or no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO₂ emissions compliance by the temporary use of a spare SO₂ emissions monitor. The spare SO₂ emissions monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

Maintain a QC program. At a minimum, the QC program must include written procedures which shall describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. CD determination and adjustment of CEMS.
3. Preventative maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling and analysis methods.
6. Program of corrective action for malfunctioning CEMS.

A.23. The following fuel sampling and analysis protocol shall be used as an alternate sampling procedure authorized by permit to demonstrate compliance with the sulfur dioxide standard in the event that the SO₂ continuous emissions monitor is not able to capture valid data:

- a. Determine and record the as-fired fuel sulfur content, percent by weight, for liquid fuels using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or equivalent, to analyze a representative sample of the blended fuel following each fuel delivery.
- b. Determine and record the as-fired fuel sulfur content, percent by weight, for coal using ASTM D2013-72 and either ASTM D3177-75 or ASTM D4239-85, or equivalent, to analyze a representative sample of the blended as-fired pulverized coal.
- c. Record daily the amount of each fuel fired, the density of each fuel, the heating value, and the percent sulfur content by weight of each fuel.
- d. Utilize the information in a., b. and c., above, to calculate the SO₂ emission rate to ensure compliance at all times. *density-calorific heat ASTM*

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

A.24. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or equivalent. **Compliance with the liquid fuel sulfur limit established in specific condition 11. shall be verified with a fuel analysis provided by the vendor upon each fuel oil delivery.**

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. & 62-297.440, F.A.C.]

A.25. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

- (a) General Compliance Testing.

None to heat log

A 250

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.
 3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.
 4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;
 - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
 - c. Each NESHAP pollutant, if there is an applicable emission standard.
 5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.
 9. 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.
 10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.
- (b) 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.
- (c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated

test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.]

Compliance Test Requirements

A.26. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

A.27,

A.28,

A.27. 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 the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

A.28. Operating Rate During Testing. Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity as defined below. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load 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.

(b) All Other Sources. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.

[Rule 62-297.310(2), F.A.C.]

A.29. Applicable Test Procedures.

(a) Required Sampling Time.

1. 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.
2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
 - b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the

relationship between a proposed surrogate standard and an existing mass emission limiting standard.

- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
 - (b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - (c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.
 - (d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.
 - (e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.
- [Rule 62-297.310(4), F.A.C.]

TABLE 297.310-1
CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		Comparison check	5%

A.30. 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.]

Recordkeeping and Reporting Requirements

{Permitting Note: The reports that are required by the following conditions are to be sent to the Northwest District office, 160 Governmental Center, Pensacola, Florida 322501-5794}

A.31. The owner or operator shall maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. These records must be of sufficient detail to determine compliance with the allowable sulfur dioxide emission limitations.

[Rule 62-4.070(3), F.A.C.]

62-213.440 and

A.32. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

A.33. Submit to the Department a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

A.34. A maintenance log of the continuous monitoring systems shall be kept showing:

- a. Time out of service.
- b. Calibration and adjustments.

[Rule 62-213.440, F.A.C.; and, AO03-211310, specific condition 8.]

A.35. Test Reports.

- (a) 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.
- (b) 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.
- (c) 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.
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.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

Miscellaneous Conditions.

A.36. Used Oil. Burning of on-specification used oil is allowed in this emissions unit in accordance with all other conditions of this permit and the following conditions:

- a. **On-specification Used Oil Emissions Limitations:** This emissions unit is permitted to burn on-specification used oil, which contains a PCB concentration of less than 50 ppm. On-specification used oil is defined as used oil that meets the specifications of 40 CFR 279 - Standards for the Management of Used Oil, listed below. “Off-specification” used oil shall not be burned. Used oil which fails to comply with any of these specification levels is considered “off-specification” used oil.

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash point	100 degrees F minimum

- b. **Quantity Limitation:** This emissions unit is permitted to burn “on-specification” used oil that is generated by Gulf Power, not to exceed 50,000 gallons during any consecutive 12 month period.
- c. **PCB Limitation:** Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement.
- d. **Operational Requirements:** On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.
- e. **Testing Requirements:** The owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs.

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

- f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
- (1) The gallons of on-specification used oil generated and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
 - (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
 - (3) Results of the analyses required above.
- [40 CFR 279.61 and 761.20(e)]

- g. Reporting Requirements: The owner or operator shall submit to the Northwest District office, within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

The owner or operator shall submit, with the Annual Operation Report form, the analytical results and the total amount of on-specification used oil burned during the previous calendar year.

[Rule 62-4.070(3) and 62-213.440, F.A.C., 40 CFR 279 and 40 CFR 761, unless otherwise noted.]

Subsection B. This section addresses the following emissions unit(s).

E.U. ID

<u>No.</u>	<u>Brief Description</u>
-003	Combustion Turbine Peaking Unit

Emissions unit number 003 is a simple cycle combustion turbine manufactured by Pratt and Whitney. It is rated at a maximum heat input of 542 million Btu per hour (MMBtu/hour) while being fueled by No. 2 fuel oil with a maximum sulfur content of 0.5%, by weight. It is used as a peaking unit to run a nominal 40 MW generator. Emissions from this combustion turbine is uncontrolled.

{Permitting notes: This emissions unit is regulated under Rule 62-210.300, F.A.C., Permits Required. This unit is not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. This combustion turbine has two stacks. Stack heights = 33 feet, exit diameters = 13.7 feet, exit temperatures = 1,200 °F, actual volumetric flow rate (for both stacks) = 1,069,740 acfm. It began commercial operation on May 18, 1971.}

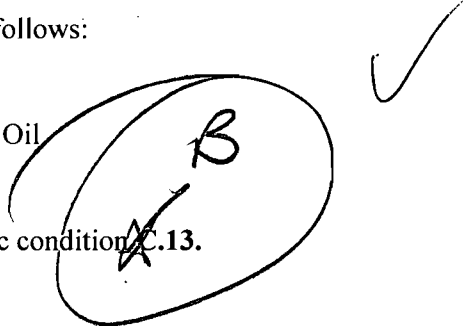
The following conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rates are as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
-003	542	No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]



B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition ~~C.13~~.
[Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation - Fuels. Only new No. 2 fuel oil shall be fired in this combustion turbine.
[Rule 62-213.410, F.A.C.]

B.4. Hours of Operation. This emissions unit may operate continuously, i.e. 8760 hours/year. The permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation.

[Rules 62-210.200(PTE), F.A.C.; and *62-213.440 and* applicant request in initial Title V application received June 14, 1996.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1-1, Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.5. Visible Emissions. Visible emissions from each turbine shall not be equal to or greater than 20 percent opacity.

[Rule 62-296.320(4)(b)1., F.A.C.; and, AO03-249657.]

B.6. Sulfur Dioxide - Sulfur Content. The sulfur content of the No. 2 fuel oil shall not exceed 0.5 percent, by weight (see specific condition ~~K.12.~~ ^B). The permittee shall maintain a log available for Department inspection of the fuel sulfur content.

[AO03-249657; and, applicant request in initial Title V application received June 14, 1996.]

Excess Emissions

B.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

B.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

B.9. Sulfur Dioxide. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific conditions ~~K.6.~~ ^B and ~~B.12.~~ ^B

[Rule 62-213.440, F.A.C.]

B.10. 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.]

Test Methods and Procedures

more to next page

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.11. Visible emissions. The test method for visible emissions shall be EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C. [Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

B.12. Sulfur Content. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or equivalent. [Rules 62-213.440 and 62-297.440, F.A.C.]

B.13. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions 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. [Rules 62-297.310(2) & (2)b., F.A.C.]

B.14. Applicable Test Procedures.

(a) Required Sampling Time.

2. Opacity Compliance Tests. When ~~either~~ EPA Method 9 or ~~DEP Method 9~~ is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2., F.A.C.]

B.15. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to

conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;
 8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
 9. 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.
 10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.
- (b) 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), F.A.C.; and, AO65-242827, Specific Condition #5 (frequency).]

Recordkeeping and Reporting Requirements

B.17. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

B.18. Test Reports.

- (a) 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.
- (b) 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.

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

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Section IV. Acid Rain Part.

Operated by: Gulf power Company
ORIS Code: 643

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions units listed below are regulated under Acid Rain, Phase II.

E.U. ID

<u>No.</u>	<u>Description</u>
-001	Boiler Number 1 - 1,229 MMBtu/hour
-004	Boiler Number 2 - 1,404 MMBtu/hour

1. The Phase II permit application submitted for this facility, as approved by the Department, is a part of this permit (included as an Attachment). The owners and operators of these Phase II acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

a. DEP Form No. 62-210.900(1)(a), dated 07/01/95.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

2. Sulfur dioxide (SO₂) allowance allocations and nitrogen oxide (NO_x) requirements for each Acid Rain unit are as follows:

	Year	2000	2001	2002
ID No. 01 Boiler 1	SO₂ allowances, under Table 2, 3, or 4 of 40 CFR 73	6,424*	6,424*	6,424*
	NO_x limit	**	**	
ID No. 04 Boiler 2	SO₂ allowances, under Table 2, 3, or 4 of 40 CFR 73	7,539*	7,539*	7,539*
	NO_x limit	**	**	**

*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.

**By January 1, 1999, this Part will be reopened to add NO_x requirements in accordance with the regulations implementing section 407 of the Clean Air Act.

3. Comments, notes, and justifications: None.

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Appendix E-1, List of Exempt Emissions Units and/or Activities.

Gulf Power Company
Lansing Smith Generating Plant

DRAFT Permit No.: 0050014-001-AV
Facility ID No.: 0050014

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

Tanks

	<u>State Registration Number</u>	<u>Contents</u>	<u>Size (Gallons)</u>
1.	1	#2 Diesel - Lighter Oil	25,000
2.	3	#2 Diesel - CT Fuel Oil	200,000
3.	4	#2 Diesel - CT Fuel Oil	200,000
4.	5	#2 Diesel - CT Fuel Oil	200,000
5.	6	Lube Oil	1,000
6.	7	Lube Oil	2,100
7.	8	Lube Oil	581
8.	9	Lube Oil	560
9.	10	Lube Oil	560
10.	11	Lube Oil	560
11.	12	Lube Oil	560
12.	13	Lube Oil	6,000
13.	14	Lube Oil	6,000
14.	15	Lube Oil	6,000
15.	16	Sulfuric Acid	4,000
16.	--	Maintenance Area, Used Oil	500
17.	--	Maintenance Area, Used Oil	500
18.	--	Used Oil	300
19.	--	Fire Pump Diesel Fuel (2)	--
20.	--	Chlorine (12)	--
21.	--	Used Oil	250
22.	--	Used Oil	500
23.			
24.			
25.		Fire Safety Equipment - Exempted by Rule 62-210.300(3)(a)22., F.A.C.	
26.		Vacuum Pumps - Exempted by Rule 62-210.300(3)(a)9., F.A.C.	
27.		Laboratory Equipment - Exempted by Rule 62-210.300(3)(a)15., F.A.C.	
28.		Welding Equipment - Exempted by Rule 62-210.300(3)(a)16., F.A.C.	

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Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Gulf Power Company
Lansing Smith Generating Plant

DRAFT Permit No.: 0050014-001-AV
Facility ID No.: 0050014

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘exempt emissions units’.

E.U. ID

No. Brief Description of Emissions Units and/or Activity

-XXX Fugitive VOC Sources - Painting Operations

Fugitive VOC emissions are generated from the painting operations associated with normal plant maintenance. SCC: 4-90-999-98, Miscellaneous Volatile Organic Compound Evaporation.

E.U. ID

No. Brief Description of Emissions Units and/or Activity

-aaa Material Handling of Coal and Ash
-bbb Fugitive PM Sources - On-site Vehicles
-ccc General Purpose Internal Combustion Engines

-aaa Material Handling of Coal and Ash. Fugitive PM emissions generated from the transfer and handling of coal and ash. SCC: 3-05-101-03.

-bbb Fugitive PM Sources. Fugitive PM emissions generated by haul trucks and other on-site vehicles. SCC: 3-05-101-50.

-ccc General Purpose Internal Combustion Engines. located for use at this source are miscellaneous internal combustion engines used to operate the following: welders, compressors, generators, water pumps, sweepers, and other auxiliary equipment.

Appendix H-1, Permit History/ID Number Changes

(For Tracking Purposes Only)

Gulf Power Company
Lansing Smith Plant

Permit No.: 0050014-001-AV
Facility ID No.: 0050014

E.U.								
<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>	<u>MW Output</u>	<u>Heat Input (MMBtu/hr)</u>
-001	Lansing Smith #1 - Stack	AO03-211310	04/17/92	04/01/97			175	(1,768) ^{1,2}
		AO03-134885	07/09/87	06/01/92			175	(1,768) ^{1,2}
		AO03-56886	07/15/82	07/01/87			175	(1,566) ^{1,3}
		Secretarial ORDER ⁴	10/18/85					
		Secretarial ORDER ⁵	12/07/82					
		AO03-2031	08/17/77	08/17/82			N/S	1,556
		AC03-2023	02/10/75	01/01/77	05/15/77		N/S	1,229
-002	Lansing Smith #2 - Stack	AO-3-1133	01/29/73	12/15/74			130	1,300
		AO03-211310	04/17/92	04/01/97			205	(2,042) ^{1,2}
		AO03-134887	07/09/87	06/01/92			205	(2,042) ^{1,2}
		AO03-56888	07/15/82	07/01/87			205	(1,974) ^{1,3}
		Secretarial ORDER ⁴	10/18/85					
		Secretarial ORDER ⁵	12/07/82					
		AO03-7636	03/22/78	03/22/83			N/S	1,924
		AC03-2024	02/10/75	01/01/77	05/15/77		N/S	1,404
	AO-3-1132	01/29/73	12/15/74			140.75	1,406	
-003	Peaking Turbines	AO03-249657	05/19/94	01/15/96				

ID Number Changes (for tracking purposes):

From: Facility ID No.: 10PCY030014

To: Facility ID No.: 0050014

¹ Number in parenthesis indicates number reported in application, not specified in the permit.

² "Maximum allowable heat input is that heat input necessary to maintain electrical load output at 110% of the level at which the most recent successful particulate matter compliance test was conducted."

³ "Maximum allowable heat input is that heat input necessary to maintain electrical load output at the level at which the most recent successful quarterly particulate matter test was conducted."

⁴ Secretarial ORDER issued to relax semi-annual PM testing requirement to annual.

⁵ Secretarial ORDER issued to relax quarterly PM testing requirement to semi-annual.

Referenced Attachments

Phase II Acid Rain Application/Compliance Plan

Appendix A-1, Abbreviations, Definitions, Citations, and Identification Numbers

Appendix SS-1, Stack Sampling Facilities (version dated 3/25/96)

Appendix TV-1, Title V Conditions(version dated 8/15/96)

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Compliance Requirements

3378 MWH/day
= 140.75 MW#

Unit #2

Application 2/5/1971 33,752.3 $\frac{\text{MMBTU}}{\text{day}} = 1406.3 \frac{\text{MMBTU}}{\text{M}}$

Replaced by AO Permit # AO-3-1132 1/29/73
ACO3-2024 exp 12/15/74

Unit #1 AO-3-1133 1/21/73 exp 12/15/1974

Replaced by ACO3-2023 & later by ACO3-2031

in accord with Application received 2/5/1971

31,206.3 MMBTU/day = 1300.26 MMBTU/month

3121 MWH/Day = 130 MW

Unit 2 AO-3-1132 1/29/73-12/15/74 140.75 MW# 1406.3 MMBTU/M

Unit #2 ACO3-2024 iss 2/10/75, exp 1/1/77, extended to 5/15/77

Permit to Construct West side E.P. Replaced by ACO3-7636

"In accordance with Appl. dated 12/16/74, and in conformity with the statements and supporting data entered therein, all of which are filed with the Dept. and are considered a part of this permit."

1404 MMBTU/M (Pulverized Coal) MW = ?

Unit #1 ACO3-2023 iss. 2/10/75 ext to 5/15/77

Replaced by ACO3-2031

1229 MMBTU/M (Pulv. Coal) MW = ?

Unit #2 original AO-3-1132 Jan 29, 1973

Unit 7 original AO-3-1133 1/29/73

Unit 1 ACO3-2031 issued 8/17/77 exp 8/17/82

1556 MMBTU/M (From AO Appl) 26.6% increase

Unit 2 ACO3-7636 iss. 3/22/78 exp 3/22/83

1924 MMBTU/M (From AO Appl) 37% increase

Unit 1 A003-56886 Issued 7/15/82 exp 7/1/87
(Replaced A003-2031)
1566 MMBTU/hr

Unit 2 A003-56888 Issued 7/15/82 exp 7/1/87
Replaced A003-7636
1974 MMBTU/hr in appl.

"Max allowable heat input is that heat input necessary to maintain load output at the level at which the most recent successful 1/4ly PM test was conducted."

* → Rated capacity missing from permit

Unit 1 A003-734965 Issued 7/9/87 exp 6/1/92
175 MW.

"Max allowable heat input is that necessary to maintain electrical load output @ 110% of the level at which the most recent successful PM test was conducted"

Appl. 1768 MMBTU/hr

Unit 2 A0134887 Issued 7/9/87 exp 6/1/92 205 MW
Appl. → 2042 MMBTU/hr

Unit 1 & 2 A003-211310
Issued 4/17/97 exp 4/1/97
175 & 205 MW
1768 2042 MMBTU/hr

Phase II Acid Rain Permit Application/Compliance Plan

Appendix A-1,
Abbreviations, Definitions, Citations, and Identification Numbers
(Version Dated 2/5/97)

Appendix SS-1,
Stack Sampling Facilities (version dated 10/7/96)

Appendix TV-1,
Title V Conditions (version dated 2/27/97)

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements