

One Energy Place
Pensacola, Florida 32520

850.505.5111

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BUREAU OF AIR REGULATION



Certified Mail

September 7, 2007

Ms. Corrie Branum
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5505
Tallahassee, Florida 32399-2400

Dear Ms. Branum:

RE: LANSING SMITH ELECTRIC GENERATING PLANT
PROPOSED SMITH HERT & MOBOTEC AIR CONSTRUCTION PERMIT
AIR PERMIT NO. 0050014-012-AC

Please find enclosed Gulf Power's response to FDEP's proposed construction permit for the demonstration testing of the SNCR-HERT and MoBotec projects at the Lansing Smith Electric Generating Plant.

We appreciate your efforts to work with us regarding Gulf's selection of pollution control technologies to meet the CAIR and CAMR requirements. Please call me regarding any additional questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "G. Dwain Waters, Q.E.P.".

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

cc: w/att: Jim Vick, Gulf Power Company
Brian Heinfeld, Gulf Power Company
Marie Largilliere, Gulf Power Company
Steven Ford, Gulf Power Company
Chip Wilson, Southern Company
Mark Berry, Southern Company
Gary Perko, Hopping, Green & Sams
Rick Bradburn, FDEP Northwest District Office, Pensacola, Florida

Lansing Smith HERT & MoBotec Project
Air Construction Permit Comments:
Air Permit No: 0050014-012-AC
September 7, 2007

Comments:

- 1) Section 3. Emissions Unit Specific Condition (SNCR-HERT Project) #5. Test Schedule; Page 3 of 4. The item references tests shall be completed within 14 days. If the permit has not expired, the permittee may request additional time to complete the testing program from the Bureau of Air Regulation. Because of availability of test contractors, unit load requirements, unforeseen weather conditions and the possibility of unscheduled delays due to the equipment associated with the temporary urea injection skid, Gulf Power requests the 14 day test window be expanded to 30 days.
- 2) Section 3. Emissions Unit Specific Condition (MoBotec Project) #4. Mercury Emissions; Page 4 of 4: For clarification purposes, it should be noted that methods other than the sorbent trap may be utilized to determine mercury emissions during the project. Gulf requests the test method description be revised to read; "The permittee shall determine the baseline mercury emissions prior to the demonstration project. During the tests, the permittee shall record the sorbent injection rate for each MoBotec/load configuration. The permittee shall determine the mercury emissions and reductions for each configuration."
- 3) Section 3. Emissions Unit Specific Condition (MoBotec Project) #6. Report; Page 4 of 4: Because the MoBotec Project is being sponsored by the Electric Power Research Institute (EPRI) and others, Gulf Power requests the report date be extended to 60 days of completing the MoBotec with MinPlus testing program in order to accommodate internal and external review of the test data due to contract considerations.