



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

August 15, 2007

ELECTRONIC MAIL - RECEIVED RECEIPT REQUESTED

jlmiller@southernco.com

Mr. Joseph Miller
OANDM Manager
Desoto County Energy Complex/Southern Power
3800 NE Roan Street
Arcadia, Florida 34266

Re: DEP File Nos. 0270016-006-AC and 0270016-007-AV
Air Construction Permit Modification and Title V Renewal
Desoto County Generating Company, LLC.

Dear Mr. Miller:

On June 25, 2007 we received your application for a simultaneous processing of an air construction permit modification and renewal of the Title V operating permit for the Desoto County Generating Company, LLC.

Pursuant to Rules 62.296.340, 62-4.055, and 62-4.070 F.A.C., Permit Processing, the Department requests submittal of additional information prior to processing the application. Please submit the information requested below to the Department's Bureau of Air Regulation by September 15, 2007. The Department is requiring the information to be submitted by that date as the processing of this application is under time constraints. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Please submit a complete acid rain part application form {DEP Form No. 62-210.900(1)(a)}. Additionally, provide a copy of the certificate of representation for the designated representative of the source.
2. Provide the latest annual compliance test results for both units.
3. In order for the Department to make a determination whether Specific Condition A.6 concerning fuel oil usage can be removed, submit historical fuel use (natural gas and fuel oil) for both the units for the last five years (2002-2006). The usage shall be in terms of annual rates in ft³ and

gallons for gas and oil, respectively. Also provide total heat input in Btu for gas and oil as well as operating hours for both fuels.

4. Provide cost effectiveness for NOx removal in \$/ton if a single unit can operate for 6,780 hours. This operation for one of the units would be possible if 5,000 hours per single year operational limitation is removed.
5. Please provide the necessary documentation (rule, calculations, etc.) to show that Emission Unit No. 004 is no longer subject to 40 CFR 60 Subpart Kb.

We will forward any comments received from other agencies as soon as we receive them. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature.

We will be happy to meet and discuss the details with you and your staff. I may be contacted at 850/921-9528.

Sincerely,



Syed Arif, P.E.
North Permitting Section

/sa

cc: J. Little, EPA (little.james@epamail.epa.gov)
D. Morse, NPS (dee_morse@nps.gov)
K. White, Gulf Power Company (kwhite@southernco.com)
C. Zhang-Torres, DEP-SWD (cindy.zhang-torres@dep.state.fl.us)

Harvey, Mary

From: Zhang-Torres
To: Harvey, Mary
Sent: Friday, August 17, 2007 8:55 AM
Subject: Read: Letter - Mr. Joseph Miller - Desota County Energy Complex/Southern Power - Project # 0270016-006-AC & 0270016-007-AV

Your message

To: 'jmillers@southernco.com'; 'Mr. Jim Little, EPA Region 4'; 'Mr. Dee Morse, National Park Service'; 'kwhite@southernco.com'; Zhang-Torres
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
Subject: Letter - Mr. Joseph Miller - Desota County Energy Complex/Southern Power - Project #0270016-006-AC & 0270016-007-AV
Sent: 8/15/2007 11:43 AM

was read on 8/17/2007 8:55 AM.

Harvey, Mary

From: Miller, J. C. [JMILLER@southernco.com]
To: undisclosed-recipients
Sent: Thursday, August 16, 2007 2:10 PM
Subject: Read: Letter - Mr. Joseph Miller - Desota County Energy Complex/Southern Power - Project # 0270016-006-AC & 0270016-007-AV

Your message

To: JMILLER@southernco.com
Subject:

was read on 8/16/2007 2:10 PM.

Harvey, Mary

From: Harvey, Mary
Sent: Wednesday, August 15, 2007 11:43 AM
To: 'jmillers@southernco.com'; 'Mr. Jim Little, EPA Region 4'; 'Mr. Dee Morse, National Park Service'; 'kwhite@southernco.com'; Zhang-Torres
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
Subject: Letter - Mr. Joseph Miller - Desota County Energy Complex/Southern Power - Project #0270016-006-AC & 0270016-007-AV
Attachments: Ltr.-Joseph Miller- Project #0270016-006-AC and 0270016-007-AV.pdf

Tracking:	Recipient	Delivery	Read
	✓ jmillers@southernco.com'		
	✓ 'Mr. Jim Little, EPA Region 4'		
	✓ 'Mr. Dee Morse, National Park Service'		
	✓ 'kwhite@southernco.com'		
	✓ Zhang-Torres	Delivered: 8/15/2007 11:43 AM	Read: 8/17/2007 8:55 AM
	✓ Arif, Syed	Delivered: 8/15/2007 11:43 AM	Read: 8/15/2007 3:18 PM
	Adams, Patty	Delivered: 8/15/2007 11:43 AM	
	✓ Gibson, Victoria	Delivered: 8/15/2007 11:43 AM	Read: 8/15/2007 11:49 AM

Dear Sir/Madam:

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

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

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

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

Thank you,

8/21/2007

Harvey, Mary

From: White, Kevin [KWHITE@southernco.com]
To: undisclosed-recipients
Sent: Wednesday, August 15, 2007 1:24 PM
Subject: Read: Letter - Mr. Joseph Miller - Desota County Energy Complex/Southern Power - Project # 0270016-006-AC & 0270016-007-AV

Your message

To: KWHITE@southernco.com
Subject:

was read on 8/15/2007 1:24 PM.

Harvey, Mary

From: White, Kevin [KWHITE@southernco.com]
Sent: Wednesday, August 15, 2007 1:24 PM
To: Harvey, Mary
Subject: RE: Letter - Mr. Joseph Miller - Desota County Energy Complex/Southern Power - Project #0270016-006-AC & 0270016-007-AV

Thank you.

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Wednesday, August 15, 2007 10:43 AM
To: Miller, J. C.; Mr. Jim Little, EPA Region 4; Mr. Dee Morse, National Park Service; White, Kevin; Zhang-Torres
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
Subject: Letter - Mr. Joseph Miller - Desota County Energy Complex/Southern Power - Project #0270016-006-AC & 0270016-007-AV

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Thank you,

Harvey, Mary

From: Arif, Syed
To: Harvey, Mary
Sent: Wednesday, August 15, 2007 3:18 PM
Subject: Read: Letter - Mr. Joseph Miller - Desota County Energy Complex/Southern Power - Project # 0270016-006-AC & 0270016-007-AV

Your message

To: 'jmiller@southernco.com'; 'Mr. Jim Little, EPA Region 4'; 'Mr. Dee Morse, National Park Service'; 'kwhite@southernco.com'; Zhang-Torres
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
Subject: Letter - Mr. Joseph Miller - Desota County Energy Complex/Southern Power - Project #0270016-006-AC & 0270016-007-AV
Sent: 8/15/2007 11:43 AM

was read on 8/15/2007 3:18 PM.

Harvey, Mary

From: Dee_Morse@nps.gov
Sent: Wednesday, August 15, 2007 11:46 AM
To: Harvey, Mary
Subject: Letter - Mr. Joseph Miller - Desota County Energy Complex/Southern Power - Project # 0270016-006-AC & 0270016-007-AV

Return Receipt

Your document: Letter - Mr. Joseph Miller - Desota County Energy Complex/Southern Power - Project #0270016-006-AC & 0270016-007-AV

was received by: Dee Morse/DENVER/NPS

at: 08/15/2007 09:44:57 AM

Harvey, Mary

From: Gibson, Victoria
To: Harvey, Mary
Sent: Wednesday, August 15, 2007 11:49 AM
Subject: Read: Letter - Mr. Joseph Miller - Desota County Energy Complex/Southern Power - Project # 0270016-006-AC & 0270016-007-AV

Your message

To: 'jmillers@southernco.com'; 'Mr. Jim Little, EPA Region 4'; 'Mr. Dee Morse, National Park Service'; 'kwhite@southernco.com'; Zhang-Torres
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
Subject: Letter - Mr. Joseph Miller - Desota County Energy Complex/Southern Power - Project #0270016-006-AC & 0270016-007-AV
Sent: 8/15/2007 11:43 AM

was read on 8/15/2007 11:49 AM.

Harvey, Mary

From: Forney.Kathleen@epamail.epa.gov
Sent: Wednesday, August 15, 2007 12:55 PM
To: Harvey, Mary
Cc: Little.James@epamail.epa.gov
Subject: Fw: Letter - Mr. Joseph Miller - Desota County Energy Complex/Southern Power - Project # 0270016-006-AC & 0270016-007-AV

Attachments: Ltr.-Joseph Miller- Project #0270016-006-AC and 0270016-007-AV.pdf



Ltr.-Joseph Miller-
Project #0...

Mary,

Region 4 recieved this document.

Thanks
Katy

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130

Fax: 404-562-9019

----- Forwarded by Kathleen Forney/R4/USEPA/US on 08/15/2007 12:46 PM

James
Little/R4/USEPA/
US

08/15/2007 12:37
PM

To
Kathleen Forney/R4/USEPA/US@EPA
cc
Subject
Fw: Letter - Mr. Joseph Miller -
Desota County Energy
Complex/Southern Power - Project
#0270016-006-AC & 0270016-007-AV

Please reply to Mary.

Jim

----- Forwarded by James Little/R4/USEPA/US on 08/15/2007 12:37 PM -----

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

To