

Memorandum

Florida Department of Environmental Protection

TO: Joseph Kahn

THRU: Trina Vielhauer
Jeff Koerner *JK*

FROM: Syed Arif *SA 10/29*

DATE: October 29, 2007

SUBJ: DeSoto County Generating Company, LLC
DeSoto County Energy Park
Project No. 0270016-006-AC

Attached for approval and signature is the final modification for the above referenced permit. The applicant was required to do a combined public notice that included Title V Renewal. The public notice was done in the DeSoto Sun on October 15, 2007. No comments were received from the public, the Department's Southwest District Office, the EPA Region IV Office or the National Park Service. Comments were submitted by the applicant, which were addressed in the final determination.

DeSoto County Generating Company, LLC requested several changes to the Air Construction Permit No. 0270016-001-AC (PSD-FL-284) for Emission Unit's 001, 002 and 004. The changes reflected the current regulatory requirements for fuel oil storage tanks, fuel oil usage requirements for the two simple cycle combustion turbines and other minor modifications. The changes were done concurrently with the renewal of the Title V Operating Permit.

I recommend your approval and signature.

Joe -
On the use of fuel oil
change -- there is still
a condition that they cannot
use > 1000 hours of fuel oil.
That still applies.
Trina

FINAL DETERMINATION

PERMITTEE

DeSoto County Generating Company, LLC
3800 Northeast Roan Street
Arcadia, FL 34266

Responsible Official: Ms. Dana P. Claburn, Plant Manager

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation, Air Permitting North Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Project No. 0270016-006-AC
Modification of Permit No. 0270016-001-AC (PSD-FL-284)
DeSoto County Energy Park

DeSoto County Generating Company, LLC (Applicant) requested several changes to the Air Construction Permit No. 0270016-001-AC (PSD-FL-284) for Emission Unit's 001, 002 and 004. The changes reflected the current regulatory requirements for fuel oil storage tanks, fuel oil usage requirements for the two simple cycle combustion turbines and other minor modifications. The changes were done concurrently with the renewal of the Title V Operating Permit.

NOTICE AND PUBLICATION

The Department distributed an Intent to Issue an Air Construction Permit Modification and Title V Air Operation Permit Renewal package on October 9, 2007. The applicant published the Public Notice of Intent to Issue Air Construction Permit Modification and Title V Air Operation Permit Renewal in the DeSoto Sun on October 15, 2007. The Department received the proof of publication on October 22, 2007. The public comment period for the Air Construction Permit Modification was 14 days and for the Title V Air Operation Permit Renewal is 30 days.

COMMENTS

No comments on the Air Construction Permit Modification were received from the public, the Department's Southwest District Office, the EPA Region 4 Office or the National Park Service.

Comments were submitted by the applicant on October 23, 2007. The following summarizes their comments and the Department's response:

1. The language of Specific Condition 14 of Section III of the Construction Permit Modification needs to be revised. The applicant recommends striking the term "curtailment" from the inserted language and revising the phrase to read: "During any consecutive 12-month period that includes an episode where natural gas availability is limited, ...". Additionally, the applicant requested that the Department delete the last sentence of the inserted text and replace it with the following language: "The permittee shall maintain documentation sufficient to authenticate any limitation on the availability of natural gas relied upon under this condition and shall make such documentation available to the Department upon request."

The Department will accept the applicant's request for changing the term "curtailment" to any episode where natural gas availability is limited. This change would more clearly include each of these scenarios:

DeSoto County Generating Company, LLC
DeSoto County Energy Park

Air Construction Permit No. 0270016-006-AC
Facility ID No. 0270016

FINAL DETERMINATION

(i) that gas supply is scheduled and flowing to the facility, but is subsequently interrupted and discontinued; (ii) that gas supply is requested based on apparent availability, but is not able to be scheduled due to actual unavailability, and (iii) that gas transportation is known to be restricted such that no request to schedule supplies to DeSoto would reasonably be fulfilled.

The Department will still require documentation for non-availability of natural gas of each episode to be submitted to the Department initially for the first year, and thereafter, the permittee can submit quarterly reports listing the dates of the episodes, the reasons provided by the supplier for limited natural gas supply and the duration of each episode during that quarter. Therefore, the condition will be revised to read as follows:

Fuel Oil Usage. The amount of back-up fuel (fuel oil) burned at the site (in BTU's) shall not exceed the amount of natural gas (primary fuel) burned at the site (in BTU's) during any consecutive 12-month period. During any consecutive 12-month period that includes an episode where natural gas availability is limited (e.g., gas supply is scheduled and flowing to the facility, but is subsequently interrupted and discontinued; gas supply is requested based on apparent availability, but is not able to be scheduled due to actual unavailability; and gas transportation is known to be restricted such that no request to schedule supplies would reasonably be fulfilled), the amount of back-up fuel (fuel oil) burned at the site (in BTU's) may exceed the amount of natural gas (primary fuel) burned at the site (in BTU's) for that consecutive 12-month period. The permittee shall provide notification (telephonic or e-mail) of each episode within 2 business days to the Department's Southwest District Office until September 30, 2008. Thereafter, the permittee shall provide quarterly documentation of the episodes to the Department's Southwest District Office. The documentation shall include the dates of the episodes, the reasons provided by the supplier for limited natural gas availability, and the duration of each episode during that quarter. [Rule 62-210.200, F.A.C. (BACT); and 0270016-001-AC, Specific Condition 14]

2. The applicant requested removal of the nitrogen content sampling requirement for fuel oil shipments contained in Specific Condition 45 of Air Construction Permit 0270016-001-AC (PSD-FL-284).

The rule citation for Specific Condition 45 is 40 Code of Federal Regulations (CFR) 60.335(d) from New Source Performance Standards (NSPS) Subpart GG. The Department will revise Specific Condition 45 as the rule citation in the specific condition is obsolete. The subpart only requires fuel oil nitrogen monitoring if the permittee claims an allowance for fuel bound nitrogen. Since the BACT standard does not provide fuel bound nitrogen allowance, sampling of nitrogen content for fuel oil is not required. Therefore, Specific Condition 45 will be revised as follows:

Fuel Oil Monitoring Schedule: The following monitoring schedule for No. 2 or superior grade fuel oil shall be followed: For all bulk shipments of No. 2 fuel oil received at this facility an analysis which reports the sulfur content ~~and nitrogen content~~ of the fuel shall be provided by the fuel vendor. The analysis shall also specify the methods by which the analyses were conducted and shall comply with the requirements of 40 CFR 60.335(d) 60.334(h).

Additionally, the Department will make the following correction to Specific Condition 8:

The Department will make a correction by removing the strikethrough of the last sentence of the specific condition. The requirement of providing manufacturers curves for heat input rates corrected to ambient conditions was a requirement of the construction permit, and needs to be a part of that condition. The condition will be revised as follows:

FINAL DETERMINATION

Permitted Capacity. The ~~maximum~~ nominal heat input rates, based on the lower heating value (LHV) of each fuel to each Unit (001 and 002) at ambient conditions of 59°F temperature, 60% relative humidity, 100% load, and 14.7 psi pressure shall not exceed 1,612 million Btu per hour (MMBtu/hr) when firing natural gas, nor 1,806 MMBtu/hr when firing No. 2 or superior grade of distillate fuel oil. These ~~maximum~~ nominal heat input rates will vary depending upon ambient conditions and the combustion turbine characteristics. Manufacturer's curves corrected for site conditions or equations for correcting to other ambient conditions shall be provided to the Department of Environmental Protection (DEP) within 45 days of completing the initial compliance testing. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and 0270016-001-AC, Specific Condition 8]

CONCLUSION

The final action of the Department is to issue the Air Construction Permit Modification with the minor revisions, corrections, and clarifications as described above.



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

October 31, 2007

Electronically sent with received receipt requested.

dpclabur@southernco.com

Ms. Dana P. Claburn, Plant Manager
DeSoto County Generating Company, LLC
3800 NE Roan Street
Arcadia, Florida 34266

Re: DeSoto County Energy Park
Project No. 0270016-006-AC
Modification of Permit No. 0270016-001-AC (PSD-FL-284)

Dear Ms. Claburn:

On June 25, 2007, the Department received your request to make several changes to the air construction permit 0270016-001-AC (PSD-FL-284) for Emission Unit's 001, 002 and 004. Based on your application and subsequent letter, the Department will modify this permit, previously issued on June 30, 2000, as follows:

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

5. ARMS Emission Unit 004, Fuel Storage, consisting of one 1.5 million gallon distillate fuel oil storage tanks ~~shall comply with all applicable provisions of 40CFR60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels, adopted by reference in Rule 62-204.800, F.A.C. [Rule 62-204.800(7)(b), F.A.C. Design]~~
8. Permitted Capacity. The ~~maximum~~ nominal heat input rates, based on the lower heating value (LHV) of each fuel to each Unit (001 and 002) at ambient conditions of 59°F temperature, 60% relative humidity, 100% load, and 14.7 psi pressure shall not exceed 1,612 million Btu per hour (MMBtu/hr) when firing natural gas, nor 1,806 MMBtu/hr when firing No. 2 or superior grade of distillate fuel oil. These ~~maximum~~ nominal heat input rates will vary depending upon ambient conditions and the combustion turbine characteristics. Manufacturer's curves corrected for site conditions or equations for correcting to other ambient conditions shall be provided to the Department of Environmental Protection (DEP) within 45 days of completing the initial compliance testing. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and 0270016-001-AC, Specific Condition 8]
11. Operating Procedures. Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturer or facility determined best practices after approval by the Department. The permittee shall submit the facility determined best practices to the Department prior to

implementing the practices. All operators (~~including supervisors~~) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.; and 0270016-001-AC, Specific Condition 11]

14. Fuel Oil Usage. The amount of back-up fuel (fuel oil) burned at the site (in BTU's) shall not exceed the amount of natural gas (primary fuel) burned at the site (in BTU's) during any consecutive 12-month period. During any consecutive 12-month period that includes an episode where natural gas availability is limited (e.g., gas supply is scheduled and flowing to the facility, but is subsequently interrupted and discontinued; gas supply is requested based on apparent availability, but is not able to be scheduled due to actual unavailability; and gas transportation is known to be restricted such that no request to schedule supplies would reasonably be fulfilled), the amount of back-up fuel (fuel oil) burned at the site (in BTU's) may exceed the amount of natural gas (primary fuel) burned at the site (in BTU's) for that consecutive 12-month period. The permittee shall provide notification (telephonic or e-mail) of each episode within 2 business days to the Department's Southwest District Office until September 30, 2008. Thereafter, the permittee shall provide quarterly documentation of the episodes to the Department's Southwest District Office. The documentation shall include the dates of the episodes, the reasons provided by the supplier for limited natural gas availability, and the duration of each episode during that quarter. [Rule 62-210.200, F.A.C. (BACT); and 0270016-001-AC, Specific Condition 14]

29. Initial (I) performance tests (for both fuels) were performed on each unit while firing natural gas as well as while firing oil. Annual (A) compliance tests shall be performed during every federal fiscal year (October 1 - September 30) pursuant to Rule 62-297.310(7), F.A.C., on each unit as indicated. The following reference methods shall be used. No other test methods may be used for compliance testing unless prior DEP approval is received in writing.

- EPA Reference Method 9 (30 minutes), "Visual Determination of the Opacity of Emissions from Stationary Sources" (I, A).
- EPA Reference Method 10, "Determination of Carbon Monoxide Emissions from Stationary Sources" (I, A).
- EPA Reference Method 20, "Determination of Oxides of Nitrogen Oxide, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines." Initial test only for compliance with 40CFR60 Subpart GG and (I, A) short-term NOX BACT limits (EPA reference Method 7E, "Determination of Nitrogen Oxides Emissions from Stationary Sources" or RATA test data may be used to demonstrate compliance for annual test requirements).
- EPA Reference Method 18, 25 and/or 25A, "Determination of Volatile Organic Concentrations." Initial test only.

In accordance with Rule 62-297.310(7), F.A.C., the Department may require the initial test to be repeated after a modification (and shakedown period not to exceed 100 days after restart) of a combustion turbine. Within 60 days of replacing combustors and restarting a unit, the permittee shall conduct an EPA Method 10 test to determine compliance with the CO emissions standard for firing natural gas. NOx CEMS data collected during each of the CO test runs shall be averaged and reported in the test report. The results of this test may be used to satisfy the requirements for an annual CO emissions test. [Rule 62-297.310, F.A.C.; and Permit No. PSD-FL-284B (0270016-004-AC), Specific Condition 29]

45. Fuel Oil Monitoring Schedule: The following monitoring schedule for No. 2 or superior grade fuel oil shall be followed: For all bulk shipments of No. 2 fuel oil received at this facility an analysis which reports the sulfur content ~~and nitrogen content~~ of the fuel shall be provided by the fuel vendor. The analysis shall also specify the methods by which the analyses were conducted and shall comply with the requirements of 40 CFR ~~60.335(d)~~ 60.334(h).

Details of the Department's review are available in the Technical Evaluation and Preliminary Determination that accompanied the Draft Permit modification package. This permit modification is issued pursuant to Chapter 403 of the Florida Statutes. Attached are copies of air construction permit No. 0270016-001-AC (PSD-FL-284). A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

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

Sincerely,



Joseph Kahn, Director
Division of Air Resource Management

11/1/2007
(Date)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit Modification was sent electronically with received receipt requested before the close of business on

11/02/07
to the persons listed:

Dana Claburn, DeSoto County Generating Company: dpclabur@southernco.com

Kevin White, P.E., Southern Company: kwhite@southernco.com

Mara Nasca, Southwest District Office: mara.nasca@dep.state.fl.us

Jim Little, EPA: little.james@epa.gov

Clerk Stamp

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

Mary L. Arny
(Clerk)

11/2/07
(Date)

Harvey, Mary

From: Claburn, Dana P. (SPC) [DPCLABUR@southernco.com]
To: undisclosed-recipients
Sent: Friday, November 09, 2007 12:18 PM
Subject: Read: DeSoto County Generating Company - Project #0270016-006-AC-FINAL

Your message

To: DPCLABUR@southernco.com
Subject:

was read on 11/9/2007 12:18 PM.

Harvey, Mary

From: White, Kevin [KWHITE@southernco.com]
To: undisclosed-recipients
Sent: Friday, November 09, 2007 1:24 PM
Subject: Read: DeSoto County Generating Company - Project #0270016-006-AC-FINAL

Your message

To: KWHITE@southernco.com
Subject:

was read on 11/9/2007 1:24 PM.

Harvey, Mary

From: Forney.Kathleen@epamail.epa.gov
Sent: Friday, November 09, 2007 1:12 PM
To: Harvey, Mary
Subject: Re: FW: DeSoto County Generating Company - Project #0270016-006-AC-FINAL

Got it, thanks

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

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

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

11/02/2007 02:39
PM

To
James Little/R4/USEPA/US@EPA
cc
Kathleen Forney/R4/USEPA/US@EPA
Subject
FW: DeSoto County Generating
Company - Project
#0270016-006-AC-FINAL

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From: Harvey, Mary
Sent: Friday, November 02, 2007 2:39 PM
To: 'Dana Claburn, DeSoto County Generating Company: '; 'Kevin White, P.E., Southern Company: '; Nasca, Mara; 'Jim Little, EPA: '
Cc: Arif, Syed
Subject: DeSoto County Generating Company - Project #0270016-006-AC-FINAL

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be

Harvey, Mary

From: White, Kevin [KWHITE@southernco.com]
Sent: Friday, November 09, 2007 1:25 PM
To: Harvey, Mary
Subject: RE: DeSoto County Generating Company - Project #0270016-006-AC-FINAL

I have received this permit.

Thank you

Kevin White

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Friday, November 09, 2007 11:16 AM
To: White, Kevin
Subject: FW: DeSoto County Generating Company - Project #0270016-006-AC-FINAL

Hi Kevin:
 Please email me back if you have received the following permit. The read receipt is needed to complete the files.
 Thanks,
 Mary Harvey

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link](#) to the DEP Customer Survey. Thank you in advance for completing the survey.

From: Harvey, Mary
Sent: Friday, November 02, 2007 2:40 PM
To: 'Jim Little, EPA:'
Cc: 'Ms. Kathleen Forney, EPA Region 4'
Subject: FW: DeSoto County Generating Company - Project #0270016-006-AC-FINAL

From: Harvey, Mary
Sent: Friday, November 02, 2007 2:39 PM
To: 'Dana Claburn, DeSoto County Generating Company:','Kevin White, P.E., Southern Company:','Nasca, Mara','Jim Little, EPA:'
Cc: Arif, Syed
Subject: DeSoto County Generating Company - Project #0270016-006-AC-FINAL

Dear Sir/Madam:

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

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

11/9/2007

Harvey, Mary

From: Claburn, Dana P. (SPC) [DPCLABUR@southernco.com]
Sent: Friday, November 09, 2007 1:59 PM
To: Harvey, Mary
Cc: White, Kevin; Syverson, Terry D. (SPC); Starks, Circe (SPC)
Subject: RE: DeSoto County Generating Company - Project #0270016-006-AC-FINAL

Good Afternoon:

Yes, thank you. I did receive the attached permit.

Thanks again,

Dana Claburn
Stanton Combined Cycle

(321) 235-2521 (office)

(407) 902-5998 (cell)

(321) 235-2595 (fax)

dpclabur@southernco.com

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Friday, November 09, 2007 12:14 PM
To: Ms. Kathleen Forney; Claburn, Dana P. (SPC)
Subject: FW: DeSoto County Generating Company - Project #0270016-006-AC-FINAL

Good Afternoon:

Please email back if you have received this permit dated Friday, November 2. The read receipt is needed for the files.

Thanks,
Mary Harvey

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Harvey, Mary
Sent: Friday, November 02, 2007 2:40 PM
To: 'Jim Little, EPA:'
Cc: 'Ms. Kathleen Forney, EPA Region 4'
Subject: FW: DeSoto County Generating Company - Project #0270016-006-AC-FINAL

From: Harvey, Mary

11/9/2007

Harvey, Mary

From: Harvey, Mary
Sent: Tuesday, November 06, 2007 3:06 PM
To: Gibson, Victoria
Subject: FW: DeSoto County Generating Company - Project #0270016-006-AC-FINAL
Attachments: 0270016.006.AC.F_.pdf.zip; DeSoto County Energy - Facility #0270016-006-AC-FINAL.pdf

Tracking:

Recipient	Delivery	Read
Gibson, Victoria	Delivered: 11/6/2007 3:06 PM	Read: 11/6/2007 3:09 PM

From: Harvey, Mary
Sent: Friday, November 02, 2007 2:39 PM
To: 'Dana Claburn, DeSoto County Generating Company:; 'Kevin White, P.E., Southern Company:; Nasca, Mara; 'Jim Little, EPA:'
Cc: Arif, Syed
Subject: DeSoto County Generating Company - Project #0270016-006-AC-FINAL

Dear Sir/Madam:

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

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

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

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

Thank you,

DEP, Bureau of Air Regulation

11/9/2007

Harvey, Mary

From: Harvey, Mary
Sent: Friday, November 02, 2007 2:39 PM
To: 'Dana Claburn, DeSoto County Generating Company:; 'Kevin White, P.E., Southern Company:; Nasca, Mara; 'Jim Little, EPA:'
Cc: Arif, Syed
Subject: DeSoto County Generating Company - Project #0270016-006-AC-FINAL
Attachments: 0270016.006.AC.F_pdf.zip

Tracking:	Recipient	Delivery	Read
	'Dana Claburn, DeSoto County Generating Company:'		
	'Kevin White, P.E., Southern Company:'		
	Nasca, Mara	Delivered: 11/2/2007 2:39 PM	Read: 11/2/2007 2:48 PM
	'Jim Little, EPA:'		
	Arif, Syed		Read: 11/2/2007 2:39 PM

Dear Sir/Madam:

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

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

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

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

Thank you,

DEP, Bureau of Air Regulation

immediate action within a specified time frame. Please

11/9/2007

Harvey, Mary

From: Nasca, Mara
To: Harvey, Mary
Sent: Friday, November 02, 2007 2:48 PM
Subject: Read: DeSoto County Generating Company - Project #0270016-006-AC-FINAL

Your message

To: 'Dana Claburn, DeSoto County Generating Company:','Kevin White, P.E., Southern Company:','Nasca, Mara; 'Jim Little, EPA:'
Cc: Arif, Syed
Subject: DeSoto County Generating Company - Project #0270016-006-AC-FINAL
Sent: 11/2/2007 2:39 PM

was read on 11/2/2007 2:48 PM.

Harvey, Mary

From: Arif, Syed
To: Harvey, Mary
Sent: Friday, November 02, 2007 2:39 PM
Subject: Read: DeSoto County Generating Company - Project #0270016-006-AC-FINAL

Your message

To: 'Dana Claburn, DeSoto County Generating Company:'; 'Kevin White, P.E., Southern Company:'; Nasca, Mara; 'Jim Little, EPA:'
Cc: Arif, Syed
Subject: DeSoto County Generating Company - Project #0270016-006-AC-FINAL
Sent: 11/2/2007 2:39 PM

was read on 11/2/2007 2:39 PM.



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

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,

8/15/2007

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: '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 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: 'jrmiller@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