



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

## P.E. Certification Statement

### Permittee:

Gulf Power Company  
Crist Electric Generating Plant

**DRAFT Permit No.:** 0330045-008-AC

**Project:** Air Construction Permit for Sulfur Dioxide (SO<sub>2</sub>) Limitation for the Emissions Units Burning Solid Fuel (Pulverized Coal)

This facility consists of seven fossil fuel fired steam generators (boilers) and two fly ash silos. Boilers 4 and 5 are substitution Acid Rain Phase I Units. Boilers 6 and 7 are Acid Rain Phase I Units. All seven boilers will be subject to the Acid Rain Phase II requirements. Natural gas is the primary fuel for boilers 1, 2 and 3. Pulverized coal is the primary fuel for boilers 4, 5, 6 and 7. Fuel oil is used as supplemental fuel in all seven of the boilers. Emissions unit number -001 is a Riley front wall-fired, dry bottom boiler designated as "Boiler Number 1". It is rated at a maximum heat input of 420 million Btu per hour (MMBtu/hour) when firing natural gas and 320 MMBtu/hour when firing fuel oil. Natural gas is the primary fuel. Emissions unit number -002 is a Riley front wall-fired, dry bottom boiler designated as "Boiler Number 2". It is rated at a maximum heat input of 420 MMBtu/hour when firing natural gas and 320 MMBtu/hour when firing fuel oil. Natural gas is the primary fuel. Emissions unit number -003 is a Riley front wall-fired, dry bottom boiler designated as "Boiler Number 3". It is rated at a maximum heat input of 550 million Btu per hour (MMBtu/hour) when firing natural gas and/or fuel oil. Natural gas is the primary fuel. All three 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. Emissions from these boilers are uncontrolled.

Emissions unit number -004 is a Combustion Engineering tangentially fired, dry bottom boiler designated as "Boiler Number 4". It is rated at a maximum heat input of 1,096.7 million Btu per hour (MMBtu/hour) when firing pulverized coal, natural gas or distillate No. 2 fuel oil (used as back-up fuel). Emissions unit number -005 is a Combustion Engineering tangentially fired, dry bottom boiler designated as "Boiler Number 5". It is rated at a maximum heat input of 1,096.7 million Btu per hour (MMBtu/hour) when firing pulverized coal, natural gas or distillate No. 2 fuel oil (used as back-up fuel). Both units are Phase I Substitution and Phase II Acid Rain Units. 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 units -004 and -005 are controlled by hot side (Buell Model # Bal. 2x34n333-4-3p) and cold side (Buell Model # 1.1x48k33-1p) electrostatic precipitators.

Emissions unit number -006 is a Foster Wheeler front wall fired, dry bottom boiler designated as "Boiler Number 6". It is rated at a maximum heat input of 3,704.8 million Btu per hour (MMBtu/hour) when firing pulverized coal, natural gas or distillate fuel oil (used as back-up fuel). Emissions unit number -007 is a Foster Wheeler front and rear wall fired, dry bottom boiler designated as "Boiler Number 7". It is rated at a maximum heat input of 6,406.4 million Btu per hour (MMBtu/hour) when firing pulverized coal, natural gas or distillate fuel oil (used as back-up fuel). These emissions units are regulated under Acid Rain, Phase I. 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 -006 are controlled by a cold side electrostatic precipitator (Wheelabrator Model # HaRDE). PM emissions from unit -007 are controlled by cold side Buell electrostatic precipitators. NO<sub>x</sub> emissions from units -006 and -007 are controlled by Foster Wheeler Low NO<sub>x</sub> Burners. Emissions unit -006 contains a PM limitation of 1,475 tons per year. This limit was established by a construction permit that was issued (in 1993) to install a new electrostatic precipitator. It was calculated based on the allowable emission limit, the maximum demonstrated heat input rate at that time, and the assumption of continuous operation (8,760 hours per year).

*"More Protection, Less Process"*



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# Department of Environmental Protection

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2600 Blair Stone Road  
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## P.E. Certification Statement (Continued)

**Permittee:**


Gulf Power Company  
Crist Electric Generating Plant

**DRAFT Permit No.:** 0330045-008-AC

**Project:** Air Construction Permit for Sulfur Dioxide (SO<sub>2</sub>) Limitation for the Emissions Units Burning Solid Fuel (Pulverized Coal)

*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).*

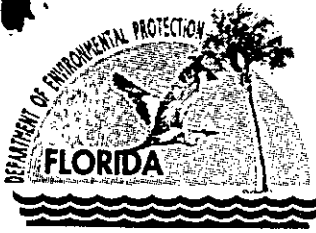
*This draft permit was prepared under my direct supervision by Mr. Bruce Mitchell of my staff.*

  
James K. Pennington      5/18/04  
James K. Pennington, P.E.      date  
Registration Number: 34536

Permitting Authority:  
Department of Environmental Protection  
Bureau of Air Regulation  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0144  
Fax: 850/922-6979

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Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

May 18, 2004

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery  
V.P. of Power Generation/Transmission  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0328

Re: Request for a Reduction of the Allowable Sulfur Dioxide (SO<sub>2</sub>) Emission Limiting Standard for Boilers Nos. 4, 5, 6 and 7,  
When Burning Solid Fuel (Pulverized Coal)  
Gulf Power Company  
Crist Electric Generating Plant  
Draft Air Construction Permit Project No.: 0330045-008-AC

Dear Mr. Ussery:

Attached is one copy of the Draft air construction permit (letter), Project No. 0330045-008-AC, to establish a reduction of the allowable sulfur dioxide (SO<sub>2</sub>) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), and to revise one (1) Specific Condition, specifically No. 5., that was established in air construction permit, No. AC17-234016, for Boiler No. 6. These emissions units are located at the Gulf Power Company's Crist Electric Generating Plant in Pensacola, Escambia County. The allowable SO<sub>2</sub> emission limiting standard will change from 5.90 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, to 2.40 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, with compliance determined by certified stack SO<sub>2</sub> continuous emission monitors.

The permitting authority's "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" are also included. The "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" must be published as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. 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(11), F.A.C.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to James K. Pennington, P.E., at the above letterhead address. If you have any other questions, please contact Bruce Mitchell at 850/413-9198.

Sincerely,

Trina L. Vielhauer  
Chief  
Bureau of Air Regulation

TLV/BM/m

Enclosures

"More Protection, Less Process"

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In the Matter of an  
Application for Permit by:

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

Draft Air Construction Permit Project No.: 0330045-008-AC  
Crist Electric Generating Plant  
Escambia County

### INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit [copy of the Draft permit (letter) enclosed] for the facility detailed in the application specified above, to establish a reduction of the allowable sulfur dioxide (SO<sub>2</sub>) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), and to revise one (1) Specific Condition, specifically No. 5., that was established in air construction permit, No. AC17-234016, for Boiler No. 6. The emissions units are located at the Gulf Power Company's Crist Electric Generating Plant in Pensacola, Escambia County.

The permittee, Gulf Power Company, applied on May 3, 2004, requesting a reduction in the allowable sulfur dioxide (SO<sub>2</sub>) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal). The allowable SO<sub>2</sub> emission limiting standard will change from 5.90 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, to 2.40 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, with compliance determined by certified stack SO<sub>2</sub> continuous emission monitors.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4 and 62-210, F.A.C. This source is not exempt from permitting procedures. The permitting authority has determined that an Air Construction Permit is required for the proposed activity.

The permitting authority intends to issue this Air Construction 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, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-110.106 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 AN AIR CONSTRUCTION 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. 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: 850/488-0114; Fax: 850/922-6979), within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. 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(11), F.A.C.

The permitting authority will issue the Final Air Construction Permit in accordance with the conditions of the enclosed Draft Air Construction 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 14 (fourteen) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION 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 Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit (letter) 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 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

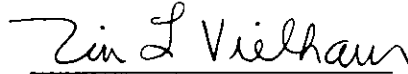
Draft Air Construction Permit Project No.: 0330045-008-AC

Page 3 of 4

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.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION**



Trina L. Vielhauer

Chief

Bureau of Air Regulation

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE and the Draft Permit (letter)) and all copies were sent by certified mail before the close of business on 5/18/04 to the person(s) listed:

Mr. Gene L. Ussery, Jr., Responsible Official and V.P. of Power Generation/Transmission, GPC

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE and the Draft Permit (letter)) were sent by U.S. mail on the same date to the person(s) listed:

- Mr. G. Dwain Waters, QEP, Air Quality Programs Supervisor, GPC
- Ms. Sandra Veazey, DEP - NWD
- Mr. Kevin White, DEP - NWD
- Mr. Andy Allen, DEP - NWD
- Mr. Jim Pennington, P.E., DEP - BAR
- Mr. Jonathan Holtom, DEP - BAR
- Mr. Cleve Holladay, DEP - BAR

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.

Paulina J. Friday 5/18/04  
(Clerk) (Date)

**PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Construction Permit Project No.: 0330045-008-AC  
Gulf Power Company  
Crist Electric Generating Plant  
Escambia County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit (letter) to Gulf Power Company for its Crist Electric Generating Plant located in Pensacola, Escambia County. The applicant's name and address are: Gene L. Ussery, Jr., V.P. of Power Generation/Transmission, Gulf Power Company, One Energy Place, Pensacola, Florida 32520-0328.

The permittee, Gulf Power Company, applied on May 3, 2004, requesting a reduction in the allowable sulfur dioxide (SO<sub>2</sub>) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal). The allowable SO<sub>2</sub> emission limiting standard will change from 5.90 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, to 2.40 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, with compliance determined by certified stack SO<sub>2</sub> continuous emission monitors.

The permitting authority will issue the Air Construction Permit, and subsequent Final Air Construction Permit, in accordance with the conditions of the Draft Air Construction 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 Draft Air Construction Permit issuance action for a period of 14 (fourteen) 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 Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction 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, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in 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, 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(s) or identification number(s), 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 demand for relief.

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.

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 Authority:

Department of Environmental Protection  
Northwest District Office  
Air Resources  
160 Governmental Place  
Pensacola, Florida 32520-0328  
Telephone: 850/595-8300  
Fax: 850/595-4417

The complete project file includes the Draft Air Construction Permit, the application/request, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact James K. Pennington, P.E., at the above address, or call 850/921-9515 for additional information.

**U.S. Postal Service  
CERTIFIED MAIL RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

7001 1140 0002 1578 1253

Mr. Gene L. Ussery, V.P. of Power Generation

|   |    |
|---|----|
| Postage   | \$ |
| Certified Fee                                     |    |
| Return Receipt Fee<br>(Endorsement Required)      |    |
| Restricted Delivery Fee<br>(Endorsement Required) |    |
| Total Postage & Fees                              | \$ |

Postmark  
Here

Sent To  
Mr. Gene L. Ussery, V.P. of Power Generation  
Street, Apt. No. or PO Box No. One Energy Place  
City, State, ZIP+4  
Pensacola, Florida 32520-0328  
PS Form 3800, January 2001 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
Mr. Gene L. Ussery  
V.P. of Power Generation/Transmission  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0328

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
 Addressee  
*Jim Larson*

B. Received by (Printed Name) *Jim Larson*

C. Date of Delivery *5/19/04*

D. Is delivery address different from item 1?  Yes  
if YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number (Transfer from service label) 7001 1140 0002 1578 1253

**TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION**

Gulf Power Company  
Crist Electric Generating Plant  
**Facility ID No.:** 0330045  
Escambia County

**Draft Air Construction Permit Project No.:** 0330045-008-AC

Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation

## 1. APPLICATION INFORMATION.

### 1.1. Applicant Name and Address:

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

Responsible Official

Mr. Gene L. Ussery, Jr., V.P. of Power Generation/Transmission

### 1.2. Reviewing and Process Schedule:

05/03/2004: Date of Receipt of Application

## 2. FACILITY INFORMATION.

### 2.1. Facility Location

The Gulf Power Company's Crist Electric Generating Plant is located at 500 Bay Front Parkway, Pensacola, Escambia County, Florida.

The UTM: coordinates of this facility are Zone 16; 478.50 km East; and, 3381.30 km North.

### 2.2. Standard Industrial Classification Code (SIC):

|                 |      |                                      |
|-----------------|------|--------------------------------------|
| Major Group No. | 49   | Electric, Gas, and Sanitary Services |
| Group No.       | 491  | Electric Services                    |
| Industry No.    | 4911 | Electric Services                    |

### 2.3. Facility Category

The Gulf Power Company's Crist Electric Generating Plant is classified as a major air pollutant emitting facility pursuant to Rule 62-210.200, F.A.C. - Definitions. This facility is classified as a Title V - Title IV facility and its initial Title V - Title IV Air Operation Permit was effective on January 1, 2000.

## 3. PROJECT DESCRIPTION.

3.1. The permittee, Gulf Power Company, applied to the Department on May 3, 2004, requesting a reduction in the allowable sulfur dioxide (SO<sub>2</sub>) emission limiting standard for the emissions units, Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal) at the Crist Electric Generating Plant located in Pensacola, Escambia County. The allowable SO<sub>2</sub> emission limiting standard will change from 5.90 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, to 2.40 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, with compliance determined by certified stack SO<sub>2</sub> continuous emission monitors.

The permitting authority intends to issue the Air Construction Permit based on the belief that reasonable assurances have been provided to indicate that operation of the facility will not adversely impact air quality, and the facility will be in compliance with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

#### **4. RULE APPLICABILITY.**

The proposed project is not subject to preconstruction review requirements under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, because the request is for a reduction in the allowable SO<sub>2</sub> emission limits for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal). Therefore, the proposed project is not a modification by definition because it is not a change in the method of operation nor is there an actual emissions increase.

In accordance with Rule 62-204.340, F.A.C., this facility is located in an Attainment Area (Escambia County) for all pollutants. The proposed project is subject to permitting under Rule 62-212.300, F.A.C., Permits Required, for purposes of establishing federal enforceability of the proposed new allowable SO<sub>2</sub> emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), and revising one (1) Specific Condition, specifically No. 5., that was established in air construction permit, No. AC17-234016, for Boiler No. 6.

#### **5. SOURCE IMPACT ANALYSIS.**

##### 5.1. Emission Limitations:

This permitting action is for the reduction of the SO<sub>2</sub> allowable emission limitation for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal).

##### 5.2. Control Technology Review:

A control technology review is not required under this permitting action.

##### 5.3. Air Quality:

Preliminary modeling was done prior to this request being submitted. That modeling shows that the resulting facility, due to this permitting project, does not cause or contribute to a violation of any air quality standard or increment.

#### **6. CONCLUSION.**

Based on the foregoing technical evaluation, the Department has made a preliminary determination that the proposed project will be in compliance with all applicable state and federal air pollution regulations. The requested changes are provided in the attached proposed Draft air construction permit (letter).

Permit Engineer: Bruce Mitchell

Reviewed and Approved by James K. Pennington, P.E.



# Department of Environmental Protection

Jeb Bush  
Governor

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

Colleen M. Castille  
Secretary

Month Day, 2004

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery, Jr.  
V.P. of Power Generation/Transmission  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0328

**DRAFT**

Dear Mr. Ussery:

RE: Request for a Reduction of the Allowable Sulfur Dioxide Emission Limiting Standard for Boilers Nos. 4, 5, 6 and 7, When Burning Solid Fuel (Pulverized Coal)  
Gulf Power Company  
Crist Electric Generating Plant  
Project No.: 0330045-008-AC

The Department has reviewed the request that you provided on May 3, 2004, which asked for a reduction in the allowable sulfur dioxide (SO<sub>2</sub>) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), at Gulf Power Company's Crist Electric Generating Plant. This permitting project establishes an allowable SO<sub>2</sub> emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), and revises one (1) Specific Condition, specifically No. 5, that was established in air construction permit, No. AC17-234016, for Boiler No. 6. Therefore, the following are added and changed:

**A. Specific Conditions.**

1. The Crist Electric Generating Plant's Boilers Nos. 4, 5, 6 and 7, shall not exceed 2.40 pounds per million Btu heat input, 24-hour average, while burning solid fuel (pulverized coal), with compliance determined by certified stack SO<sub>2</sub> continuous emission monitors.

[Applicant Request; Rules 62-4.070(3), 62-204.220(1) and 62-212.300(1)(b), F.A.C.; and, 0330045-008-AC]

2. All of the terms and conditions of the attached air construction permit, No. AC17-234016, remain the same except for Specific Condition No. 5., as follows:

a. Revision to Specific Condition No. 5., AC17-234016, for Boiler No. 6.

**FROM:**

The manner, nature, volume and frequency of permitted emissions, applicable emissions limiting standards, if any, and allowable emissions are listed as per FAC Rule 17-210.300(2)(a):

| <u>Airborne<br/>Contaminant<br/>Emitted</u> | <u>FAC Rule</u>    | <u>Allowable<br/>Emissions<br/>T/yr</u> |
|---|--------------------|---|
| SO <sub>2</sub>                             | 17-296.405(1)(c)2c | 87035 <sup>2</sup>                      |

<sup>2</sup> Based on steady-state operating parameters, application to construct and rule: SO<sub>2</sub> emissions shall not exceed 5.90 pounds per million Btu heat input.

"More Protection, Less Process"

Printed on recycled paper.

Mr. Gene L. Ussery, Jr.  
Gulf Power Company: Crist Electric Generating Plant  
Boilers Nos. 4, 5, 6 and 7  
Project No.: 0330045-008-AC  
Page 2 of 2

**TO:**

The manner, nature, volume and frequency of permitted emissions, applicable emissions limiting standards, if any, and allowable emissions are listed as per Rule 62-210.300(2)(a), F.A.C.:

| <u>Airborne</u><br><u>Contaminant</u><br><u>Emitted</u> | <u>FAC Rule</u>      | <u>Allowable</u><br><u>Emissions</u><br><u>T/yr</u> |
|---|----------------------|---|
| SO <sub>2</sub>   | 62-296.405(1)(c)2.c. | 38945 <sup>2</sup>                                  |

<sup>2</sup> Based on steady-state operating parameters, application to construct and rule:  
SO<sub>2</sub> emissions shall not exceed 2.40 pounds per million Btu heat input, 24-hour average, for the coal-fired emissions unit.

[Applicant Request; Rules 62-4.070(3), 62-204.220(1) and 62-212.300(1)(b), F.A.C.; and, 0330045-008-AC]

3. ATTACHMENT GENERAL CONDITIONS is a part of this permit (letter) and incorporated by reference.

**B. Attachment Section.**

- a. Air construction permit, No. AC17-234016, dated October 7, 1993.
- b. Mr. G. Dwain Waters's letter received May 3, 2004.
- c. ATTACHMENT GENERAL CONDITIONS.
- [d]. Public Notice affidavit received **Month Day**, 2004.
- [e]. [Final Determination.]

The Department has relied on the information referenced in the Attachment Section and conversations with representatives of Gulf Power Company in making this permitting action.

Sincerely,

Michael G. Cooke, Director  
Division of Air Resource Management

MGC/rbm

**Enclosures**

cc: Trina Vielhauer, DEP - BAR  
Jonathan Holtom, DEP - BAR  
Sandra Veazey, DEP - NWD  
G. Dwain Waters, Q.E.P., GPC

Jim Pennington, DEP - BAR  
Cleve Holladay, DEP - BAR  
Andy Allen, DEP - NWD

## ATTACHMENT GENERAL CONDITIONS

### Rule 62-4.160, F.A.C.

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.  
[Rule 62-4.160(1), F.A.C.]
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.  
[Rule 62-4.160(2), F.A.C.]
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, 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 or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.  
[Rule 62-4.160(3), F.A.C.]
- G.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.  
[Rule 62-4.160(4), F.A.C.]
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.  
[Rule 62-4.160(5), F.A.C.]
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.  
[Rule 62-4.160(6), F.A.C.]
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
  - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

[Rule 62-4.160(7), F.A.C.]



- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
  - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- [Rule 62-4.160(8), F.A.C.]
- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- [Rule 62-4.160(9), F.A.C.]
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- [Rule 62-4.160(10), F.A.C.]
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- [Rule 62-4.160(11), F.A.C.]
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- [Rule 62-4.160(12), F.A.C.]
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology ( )
  - (b) Determination of Prevention of Significant Deterioration ( ) ; and
  - (c) Compliance with New Source Performance Standards ( ).
- [Rule 62-4.160(13), F.A.C.]
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - (c) Records of monitoring information shall include:
    - 1. The date, exact place, and time of sampling or measurements;
    - 2. The person responsible for performing the sampling or measurements;
    - 3. The dates analyses were performed;
    - 4. The person responsible for performing the analyses;
    - 5. The analytical techniques or methods used; and
    - 6. The results of such analyses.
- [Rule 62-4.160(14), F.A.C.]

G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.  
[Rule 62-4.160(15), F.A.C.]