



MEMORANDUM

TO: Michael G. Cooke

THRU: Trina Vielhauer 

FROM: Bobby Bull 

DATE: March 30, 2006

SUBJECT: FINAL Permit No. 0330045-013-AC
Gulf Power Company
Crist Electric Generating Plant

Attached for approval and signature is a final air construction permit for the Crist Electric Generating Plant. This air construction permit authorizes construction of selective non-catalytic reduction (SNCR) systems on Units 4 and 5 for the purpose of reducing nitrogen oxide (NOX) emissions in order to comply with the requirements of the "Agreement For The Purpose Of Ensuring Compliance with Ozone Ambient Air Quality Standards", dated August 28, 2002.

This project is not subject to PSD because there will be no emissions changes associated with the modification. The facility will be subject to all current emissions limits.

Comments were received from the applicant concerning the DRAFT Permit that was clerked on March 7, 2006. All comments are addressed in the final determination, and responses to the comments have been discussed with the applicant.

I recommend your approval and signature.

Attachment

TV/rlb

FINAL DETERMINATION

Gulf Power Company
Crist Electric Generating Plant
DEP File No. 0330045-013-AC

The Department distributed a public notice package on March 7, 2006 which authorizes construction of selective non-catalytic reduction (SNCR) systems on Units 4 and 5 for the purpose of reducing nitrogen oxide (NOX) emissions in order to comply with the requirements of the "Agreement For The Purpose Of Ensuring Compliance with Ozone Ambient Air Quality Standards", dated August 28, 2002 at the Crist Electric Generating Plant, located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida. The Public Notice of Intent to Issue was published in the Pensacola News Journal on March 15, 2006.

COMMENTS/CHANGES

Comments were received from the applicant on March 20, 2006.

Technical Evaluation and Preliminary Determination

Page 2 of 6 under Background

Comment: In reference to the Unit 6 SNCR:

Replace: Installation of the SNCR system is near completion.

With: Installation of the SNCR system has been completed.

Response: The Department will revise this statement to reflect completion of the SNCR system on Unit 6.

Page 4 of 6 under Boiler

Comment: Replace: 5 urea injectors will be installed spaced across the front of the boiler at an elevation of 159'-0"

With: 5 wall-mounted urea injectors will be installed at an elevation of 159'-0".

Response: The Department will revise this statement to better reflect the installation of the injectors.

Page 5 of 6 under Design Specifications, Ammonia Slip

Comment: Replace: When ammonia measurements in the flue gas are required, a wet chemical method will be utilized.

With: When ammonia measurements in the flue gas are required, EPA Method CTM-027 or other methods approved by EPA (such as Method 320, which incorporates FTIR) will be used.

Response: The Department will revise the specifications to recognize EPA approved test methods.

Page 5 of 6 under Conclusion

Comment: As we discussed and agreed upon, the following was included in error and should be removed: Annual performance testing is required for NOx reduction efficiency and ammonia slip.

Response: The Department is not requiring annual performance testing for NOx reduction efficiency and ammonia slip. The statement will be removed this sentence from the evaluation.

Draft Permit- Section 3 Emissions Unit Specific Conditions

Page 5 of 7, Condition 3 in the permitting note.

Comment: There are a few sentences toward the end of the paragraph that reference the urea injection rates, Unit 4 is listed twice. The second Unit 4 should be replaced with Unit 5.

Response: The correction will be made to reflect the correct emission unit.

Page 5 of 7, Condition 3 in the permitting note

Comment: Replace: When ammonia measurements in the flue gas are required, FTIR will be utilized.

FINAL DETERMINATION

Gulf Power Company
Crist Electric Generating Plant
DEP File No. 0330045-013-AC

With: When ammonia measurements in the flue gas are required, EPA Method CTM-027 or other methods approved by EPA (such as Method 320, which incorporates FTIR) will be used.

Response: The Department will revise the permitting note to recognize EPA approved test methods.

Page 5 of 7, Condition 3 in the permitting note

Comment: Second to last and last sentence state: "More frequent tracking of ammonia slip will be monitored by measuring the amount of residual ammonia absorbed by the fly ash. Fly ash samples will be measured periodically using an ion-specific electrode." There is no regulatory basis for this requirement, these sentences should be removed.

Response: This statement was inadvertently included in the permitting note. The Department will remove the statement from the note.

Page 5 of 7, Condition 5

Comment: Condition 5 requires completion of the SNCR system by May 1st; this should not be required; only effective date of the new 0.2 limit. This condition should be deleted.

Response: The agreement does not specify a deadline for installation of the SNCR system on Units 4 and 5, only the effective date of the plant-wide NO_x cap. The condition will be deleted from the permit, and conditions will re-numbered in the final permit.

Page 6 of 7, Condition 8 (Newly Numbered Condition 7)

Comment: Second to last sentence should include SNCR on Unit 6. Replace with the following: The plant-wide NO_x emission standard shall be achieved by utilizing the SCR system for Unit 7 and the SNCR systems for Units 6, 5, and 4, as needed.

Response: Unit 6 will be added to the sentence.

Page 6 of 7, Condition 10 (Newly Numbered Condition 9)

Comment: Gulf Power does not agree with including 25% reduction as a condition of the construction permit. It is Gulf Power's position that SNCR technology will be installed on Units 4&5 and operated to the extent necessary to meet the plant-wide 0.20 lb/MMBtu limit in the FDEP-Gulf agreement.

Compliance with that limit provides the Department reasonable assurance that Gulf will properly install and operate, as needed, the SNCR equipment on these units. Gulf Power would also like it to be noted that as mentioned in the SNCR system description which was attached to the permit application, the reduction guarantees made by Fuel Tech are highly dependant on boiler combustion parameters and fuel which can be highly variable.

Response: The Department recognizes that the SNCR system is being designed for a 25% reduction, but the system will be operated as necessary to comply with the plant-wide NO_x cap. The Department will clarify in conditions 3 and 9 that the 25% NO_x reduction is the design target with an initial demonstration test.

CONCLUSION

The final action of the Department is to issue the permit with the minor changes noted above.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF FINAL PERMIT REVISION

In the Matter of an
Application for Permit by:

Ms. Penny Manuel
Vice President and SPO
Gulf Power Company
One Energy Place
Pensacola, Florida 32520

Crist Electric Generating Plant
No. 0330045-013-AC
Project- Unit 4 and 5 SNCR
Project/Biomass

On February 10, 2006, Gulf Power Company submitted an application to construct selective non-catalytic reduction (SNCR) systems on Units 4 and 5 for the purpose of reducing nitrogen oxide (NO_x) emissions in order to comply with the requirements of the "Agreement For The Purpose Of Ensuring Compliance With Ozone Ambient Air Quality Standards", dated August 28, 2002. These permits primarily regulate Emissions Units at the Crist Electric Generating Plant, which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida.

Enclosed is Final Permit No. 0330045-013-AC which authorizes construction of SNCR systems on Units 4 and 5. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order 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.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

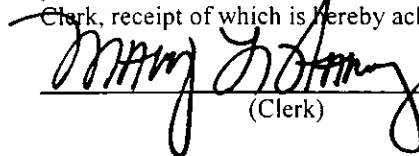
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 3/30/06 to the persons listed:

Penny Manuel, Gulf Power*
Gregory N. Terry, P.E., Gulf Power
Allison N. Little, Gulf Power
Kevin White, P.E., DEP-NWD

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk)

3/30/06
(Date)



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

PERMITTEE

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

Authorized Representative:

Penny M. Manuel, Vice President and SPO

Crist Electric Generating Plant
Unit 4 and 5 SNCR Project/Biomass
Facility ID No. 0330045
Air Permit No. 0330045-013-AC
Permit Expires: April 1, 2007

PROJECT AND LOCATION

This permit authorizes the construction of a new selective non-catalytic reduction systems and allows limited biomass firing for Unit 4 and 5 at the existing Crist Electric Generating Station (SIC 4911), which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida. The map coordinates are: Zone 16; 478.50 km East; and 3381.30 km North.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department. This air construction permit supplements all other valid air construction and operation permits.

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

Michael G. Cooke

Michael G. Cooke, Director
Division of Air Resource Management

3/30/06

(Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

The existing plant consists of six fossil fuel fired steam generators and two fly ash silos. Natural gas is the primary fuel for Units 2 and 3. Pulverized coal is the primary fuel for Units 4, 5, 6 and 7. Fuel oil is used as supplemental fuel in all six of the units. The following units are affected by this air construction permit.

ID	Emission Unit Description
002	Boiler No. 2 (Phase II Acid Rain Unit) (to be retired by May 1, 2006)
003	Boiler No. 3 (Phase II Acid Rain Unit) (to be retired by May 1, 2006)
004	Boiler No. 4 (Phase I and II Acid Rain Unit)
005	Boiler No. 5 (Phase I and II Acid Rain Unit)
006	Boiler No. 6 (Phase I Acid Rain Unit)
007	Boiler No. 7 (Phase I Acid Rain Unit)

REGULATORY CLASSIFICATION

Title III: The existing facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The existing facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

RELEVANT DOCUMENTS

"Agreement For The Purpose Of Ensuring Compliance With Ozone Ambient Air Quality Standards", dated August 28, 2002. (Attached and made part of this permit as Appendix NA – NO_x Agreement.)

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct, modify, or operate emissions units at this facility shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all permit applications shall also be sent to the Compliance Authority.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northwest District Office at 160 Governmental Center, Pensacola, Florida 32501-5794.
3. Appendices: The following Appendices are attached as part of this permit: Appendix CF (Citation Format); Appendix GC (General Conditions); Appendix NA (NO_x Agreement); and, Appendix SC (Standard Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-4, 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Construction Approval: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Rule 62-210.200(76), F.A.C. defines *construction* as, "The act of performing on-site fabrication, erection, installation or modification of an emissions unit or facility of a permanent nature, including installation of foundations or building supports; laying of underground pipe work or electrical conduit; and fabrication or installation of permanent storage structures, component parts of an emissions unit or facility, associated support equipment, or utility connections. Land clearing and other site preparation activities are not a part of the construction activities." Such permits shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions units. The permittee shall apply for a Title V operation permit (revision) at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Emissions Units 002 - 007

This section of the permit addresses the following existing emissions units, with an emphasis on Units 4 and 5.

ID	Emission Unit Description
002	Boiler No. 2 (Phase II Acid Rain Unit) (to be retired by May 1, 2006)
003	Boiler No. 3 (Phase II Acid Rain Unit) (to be retired by May 1, 2006)
004	Boiler No. 4 (Phase I and II Acid Rain Unit)
005	Boiler No. 5 (Phase I and II Acid Rain Unit)
006	Boiler No. 6 (Phase I Acid Rain Unit)
007	Boiler No. 7 (Phase I Acid Rain Unit)

Emissions Units 4 and 5

Description: Units 4 and 5 are Combustion Engineering tangentially-fired, dry-bottom electric utility boilers that began commercial operation on July 1, 1959 and June 1, 1961, respectively.

Fuels: coal, natural gas, new No. 2 fuel oil and/or on-specification used oil, occasional on-site generated "oil contaminated soil" and biomass fuels.

Capacity: 1096.7 MMBtu/hour when firing pulverized coal and/or natural gas.

PM Controls: Cold-side and hot-side electrostatic precipitators.

NO_x Controls: Low NO_x burner tips and selective non-catalytic reduction (SNCR).

Continuous Monitors: CO₂, NO_x, SO₂, opacity, stack gas flow, and urea injection rate.

Stack Parameters: Units 4 and 5 shares a common stack with Units 2 and 3 that is 450 feet tall with a diameter of 18.0 feet. The volumetric flow rate of Unit 2, 3, 4, and 5 combined, at permitted capacity, is approximately 802,500 acfm.

{Permitting Note: Based on the current Title V air operation permit, Units 4 and 5: are regulated under Rule 62-296.405, F.A.C. (Fossil Fuel Fired Steam Generators > 250 MMBtu/Hour Heat Input); predates the requirements of Rule 62-212.400, F.A.C. (PSD Preconstruction Review); and are regulated under Phase I and II of the federal Acid Rain Program (40 CFR 75). On August 28, 2002, Gulf Power Company and the Florida Department of Environmental Protection entered into an agreement titled, "Agreement for the Purpose of Ensuring Compliance with the Ozone Ambient Air Quality Standards" (Agreement). The "Agreement" is the basis for many of the following permit conditions.}

PREVIOUS APPLICABLE REQUIREMENTS

- Other Permits:** The conditions of this permit supplement all previously issued air construction and operation permits for this emissions unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070, F.A.C.]
- Mercury Research Center:** Air construction Permit 0330045-011-AC authorizes the facility to operate a temporary research center for evaluating mercury (Hg) emission reduction techniques. The research center uses a slip stream of flue gas from Unit 5. To avoid compromising test results from the research center, the SNCR may not be operated while research is being conducted by the facility. Unit 5 stack emissions shall not exceed any limit within existing permits and this permit. Testing shall cease as soon as possible if the boiler operations are not in accordance with conditions in existing permits, this permit, or air construction Permit 0330045-011-AC. Testing by the research center shall not resume until appropriate measures to correct the problem(s) have been implemented. [Permit Application 0330045-013-AC and Permit 0330045-011-AC]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Emissions Units 002 - 007

EQUIPMENT AND CONSTRUCTION

3. Selective Non-Catalytic Reduction (SNCR) System: The permittee shall construct, tune, operate, and maintain a new SNCR system each for Units 4 and 5 to reduce emissions of nitrogen oxides (NO_x) as described in the application, approved drawings, plans, and other documents on file with the Department. The SNCR system shall be designed for a target NO_x reduction of 25% as measured across the SNCR unit inlet and outlet. The designed target ammonia slip level is 5 ppmv corrected to 3% O₂ based on a 24-hour average. The storage of urea shall comply with all applicable requirements of the Chemical Accident Prevention Provisions in 40 CFR 68.

{Permitting Note: Fuel Tech, Inc. designed the new SNCR system. Urea will be delivered by truck (or possibly rail) and stored on site as a 40% aqueous solution in one 45,000 gallon tank. This will provide approximately 7 days operating inventory. The solution will be maintained at a temperature of approximately 40 °F by circulating through the SNCR system piping loop heating module. Using plant service water or other dilution water source, the metering module dilutes the reagent to a predetermined concentration (somewhat less than 30%) and precisely controls the flow of the diluted reagent to distribution modules located near the boiler injection point. The distribution modules provide the final control of diluted reagent and atomizing/cooling (plant) air being delivered to each injector. The diluted reagent is injected into the boiler via wall-mounted air atomizing lances, which will be installed across the face of the boiler at an elevation of 159'-0" for each unit. At peak load for Unit 4, with 0.36 lb/MMBtu inlet NO_x and 25% reduction, urea injection would be 233 lb/hr on a dry basis. This translates to an ammonia flow of 132 lb/hr. At peak load for Unit 5, with 0.36 lb/MMBtu inlet NO_x and 25% reduction, urea injection would be 238 lb/hr on a dry basis. This translates to an ammonia flow of 135 lb/hr. The SNCR is designed with a maximum ammonia slip concentration of 5 ppmvd corrected to 3% O₂ (24 hour basis) in the duct cross-sectional area for all boiler loads. There are no provisions for continuously monitoring ammonia concentration in the flue gas. When ammonia measurements in the flue gas are required, EPA Method CTM-027 or other methods approved by EPA (such as Method 320, which incorporates FTIR) will be used.}
[Design; Paragraph 2 of the Agreement; Rule 62-204.800, F.A.C.; 40 CFR 68]

4. Updated Designs: The permittee shall update the Department with final design specifications and any substantial changes made to the final design specifications during the actual construction phase. [Rule 62-4.070(3), F.A.C.]

PERFORMANCE REQUIREMENTS

5. Biomass Fuels: Subject to the conditions of this permit, each unit may also fire carbonaceous fuel consisting of the following untreated materials: wood chips, switchgrass, sawdust, and sander dust in addition to currently authorized fuels. These materials shall be substantially free of plastics, metals, paint or other chemicals. Heat input rate from biomass fuels shall not exceed 40.2 MMBtu per hour for each unit. The maximum hourly firing rates of carbonaceous fuels for each unit are: 4.7 tons of wood chips per hour, 2.9 tons of switchgrass per hour, 3.7 tons of sawdust per hour, and 3.7 tons of sander dust per hour. The above limits are not cumulative and only one carbonaceous fuel type may be fired at a time. [Applicant Request; Rule 62-210.200(PTE), F.A.C.]
6. Biomass Fugitive Dust Emissions: The permittee shall minimize unconfined particulate matter emissions from the storage and handling of carbonaceous fuels by using dust suppressing techniques such as covering, confining, or applying water to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

EMISSIONS STANDARDS

7. Plant-Wide NO_x Limit: Emissions of nitrogen oxides (NO_x) from the combined operation of Units 4, 5, 6, and 7 shall not exceed 0.2 lb/MMBtu of heat input based on a 30-day rolling average except for periods when Unit 7 is shutdown. The plant-wide daily NO_x emission rate shall be determined by the following equation:

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Emissions Units 002 - 007

$$\text{Plant-Wide Daily MMBtu-Weighted NO}_x \text{ Emission Rate} = \frac{\sum_{\text{Units 4, 5, 6, 7}} [(\text{Unit \# daily MMBtu}) \times (\text{Unit \# daily NO}_x \text{ CEMS Rate})]}{\sum_{\text{Units 4, 5, 6, 7}} (\text{Unit \# daily MMBtu})}$$

The "Unit # daily MMBtu" shall be determined by the daily as-burned fuel analysis and the fuel fired for each unit. The "Unit # daily NO_x CEMS Rate" shall be determined by the daily average of NO_x CEMS data for each unit and reported in terms of "lb/MMBtu heat input". The plant-wide daily NO_x emissions rate shall be determined each day regardless of the operating status for Unit 7. The plant-wide 30-day rolling NO_x average shall be determined for each 30 sequential Unit 7 operating days, which need not be consecutive. A Unit 7 operating day means any calendar day that Unit 7 operates a minimum of 18 hours. The Unit 7 daily NO_x CEMS rate may consist of less than 18 hours of data if this is due to CEMS malfunction or invalid CEMS data. When the catalyst temperature is below 600° F during a startup or shutdown, NO_x emissions data collected during such periods may be excluded from the daily NO_x average. In accordance with Condition No. 9 of Subsection 3A of permit 0330045-005-AC, NO_x emissions data collected during SCR bypass during the non-ozone season may be excluded from the daily NO_x average. The plant-wide NO_x emission standard shall be achieved by utilizing the SCR system for Unit 7 and the SNCR systems for Units 4, 5, and 6. The facility shall be in compliance with the plant-wide NO_x emission standard of 0.2 lb/MMBtu no later than May 1, 2006. [Paragraphs 2, 3 and Exhibit B of the Agreement]

EMISSIONS PERFORMANCE TESTING

8. **Test Notification:** The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification shall include: the scheduled date, approximate start time, test team, contact name and phone number, description of unit to be tested, and the tests to be performed. [Rule 62-297.310(7)(a)9, F.A.C.]
9. **Nitrogen Oxides, Compliance Tests:** Within 60 days after completing construction of the SNCR system and bringing Units 4 and 5 on line, the permittee shall conduct tests to validate the 25% NO_x reduction target. The permittee shall conduct one test with the SNCR system operating and compare the results to a baseline test with the SNCR system turned off. Both tests shall be conducted at the same operational and ambient conditions, and shall be performed in accordance with EPA Method 7E as adopted by reference in Rule 62-204.800, F.A.C. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]
10. **Ammonia Slip, Performance Tests:** Within 60 days after completing construction of the SNCR system and bringing Units 4 and 5 on line, the permittee shall conduct tests to determine the ammonia slip rate in accordance with EPA Method CTM-027 or other methods approved by EPA (such as Method 320, which incorporates FTIR). If tests show ammonia slip emissions are greater than the design target level specified in Condition No. 2 of this subsection, the permittee shall take corrective actions such as repair, addition of urea injectors for better mixing, addition of mixing vanes in the duct, etc. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

{Permitting Note: EPA Methods 1 (Traverse Points), 2 (Velocity and Flow Rate), 3 (Gas Analysis), 4 (Moisture Content), and 19 (Calculating Emission Rates, Use of F-Factors) shall be used as necessary to supplement the required test methods.}

CONTINUOUS MONITORING REQUIREMENTS

{Permitting Note: In accordance with the federal Acid Rain requirements, the following continuous monitors are installed on these units: SO₂, NO_x, CO₂ and stack gas flow.}

11. **NO_x CEMS:** To demonstrate compliance with the emissions standards, the permittee shall install, calibrate, operate and maintain a continuous emissions monitoring system (CEMS) to continuously monitor and record the emissions of nitrogen oxides for units 4 and 5 and an appropriate diluent gas (carbon dioxide or

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Emissions Units 002 - 007

oxygen). The CEMS shall monitor and record data during all periods of Units 4 and 5 operation including startup, shutdown, malfunction or emergency conditions, but not including continuous monitoring system breakdowns, repairs, calibration checks, or zero and span adjustments. For each calendar quarter, monitor availability shall be 95% or greater. If unable to achieve this level, the permittee shall submit a report identifying the problems in achieving 95% monitor availability and a plan of corrective actions. The permittee shall implement the reported corrective actions within the next calendar quarter. *{Permitting Note: The existing NO_x CEMS required by the Acid Rain program satisfies this requirement.}* [Rule 62-4.070(3), F.A.C.]

12. **SNCR Urea Injection:** In accordance with the manufacturer's specifications, the permittee shall install, calibrate, operate and maintain a flow meter to measure and record the urea injection rate for the SNCR system. The permittee shall document the general range of urea flow rates required to meet the NO_x standard over the range of load conditions by comparing NO_x emissions with urea flow rates. During NO_x monitor downtimes or malfunctions, the permittee shall operate at a urea flow rate that is consistent with the documented flow rate for the given load condition. [Rules 62-4.070(3), F.A.C.]

RECORDS AND REPORTS

13. **Test Reports:** The permittee shall prepare and submit reports for all required tests in accordance with the provisions of Rule 62-297.310(8), F.A.C. For each required test run, the report shall indicate the actual heat input rate (MMBtu/hour), the NO_x emission rate (lb/MMBtu) as recorded by the CEMS, and the urea injection rate (lb/hour). The report shall also include copies of the continuous monitoring records for the NO_x emissions. [Rule 62-297.310(8), F.A.C.]

14. **Quarterly Report:** Within 30 days following a calendar quarter, the permittee shall submit a quarterly report. For each calendar day during the reporting quarter, the permittee shall report the following information related to the operation of Units 4, 5, 6 and 7:

- Hours of operation for each Unit;
- The Unit # daily MMBtu for each Unit (see Condition 5 of this Subsection);
- The Unit # daily NO_x CEMS rate for each Unit. lb/MMBtu (see Condition 5 of this Subsection);
- The Plant-Wide Daily MMBtu-Weighted NO_x Emission Rate (see Condition 5 of this Subsection);
- The 30-day plant-wide average NO_x emission rate, lb/MMBtu;
- Identify whether Unit 7 operated less than 18 hours;
- Identify the occurrence of a Unit 7 startup or shutdown;
- Whether or not the day included a startup, shutdown, or malfunction of the SNCR or SCR systems; and,
- Identify operation of Unit 7 with SCR bypass for catalyst maintenance or repair and the duration of bypass (hours).

Identify the "F" factor used for any calculations, the method of determination, and type of fuel combusted. For each day that CEMS data was not obtained for at least 18 hours of Unit 6 operation, provide a justification for not obtaining sufficient data and describe the corrective actions taken to prevent this in the future. Identify any emissions data excluded from the calculation of emission rates due to startup, shutdown, or malfunction. [Rule 62-4.070(3), F.A.C.; NO_x Agreement, Exhibit "B"]

SECTION 4. APPENDICES

Table of Contents

Appendix CF - Citation Format;
Appendix GC - General Conditions;
Appendix NA - NO_x Agreement; and,
Appendix SC - Standard Conditions

SECTION 4. APPENDIX CF
CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit
"AO" identifies the permit as an Air Operation Permit
"123456" identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located
"2222" represents the specific facility ID number
"001" identifies the specific permit project
"AC" identifies the permit as an air construction permit
"AF" identifies the permit as a minor federally enforceable state operation permit
"AO" identifies the permit as a minor source air operation permit
"AV" identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the Prevention of Significant Deterioration of Air Quality
"FL" means that the permit was issued by the State of Florida
"317" identifies the specific permit project

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

Agreement

On August 28, 2002, Gulf Power Company and the Florida Department of Environmental Protection entered into an agreement titled, "Agreement for the Purpose of Ensuring Compliance with the Ozone Ambient Air Quality Standards". Throughout the permit, this is cited as the "Agreement".

SECTION 4. APPENDIX GC
GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

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.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and 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.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed 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.
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.

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.

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

SECTION 4. APPENDIX GC
GENERAL CONDITIONS

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and 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.
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.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable to project);
 - b. Determination of Prevention of Significant Deterioration (not applicable to project); and
 - c. Compliance with New Source Performance Standards (not applicable to project).
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.
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.

SECTION 4. APPENDIX NA
NO_x AGREEMENT

One Energy Place
Pensacola, Florida 32520
Tel 850.444.6111



August 29, 2002

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

020943 - E1

Dear Ms. Bayo:

Enclosed are an original and fifteen copies of the Petition for Approval of FDEP/Gulf Power Company Agreement Pursuant to Section 366.8255(1)(d)7 of the Florida Statutes for Purposes of Cost Recovery of the Related Expenditures and Expenses through the Environmental Cost Recovery Clause.

Also enclosed is a 3.5 inch double sided, high density diskette containing the Petition in Microsoft Word format as prepared on a Windows NT based computer.

Sincerely,

A handwritten signature in cursive script that reads "Susan D. Ritenour".

Susan D. Ritenour
Assistant Secretary and Assistant Treasurer

lw

cc: Beggs and Lane
Jeffrey A. Stone, Esquire

DOCUMENT NUMBER DATE
J9191 AUG 30 88
FPSC-COMMISSION CLERK

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for approval of FDEP/Gulf Power agreement pursuant to Section 366.8255(1)(d)7 of the Florida Statutes for purposes of cost recovery of the related expenditures and expenses through the Environmental Cost Recovery Clause.

Docket No. 02 _____-EI
Date Filed: August 30, 2002

PETITION FOR APPROVAL OF FDEP/GULF POWER AGREEMENT PURSUANT TO SECTION 366.8255(1)(d)7 OF THE FLORIDA STATUTES FOR PURPOSES OF COST RECOVERY OF THE RELATED EXPENDITURES AND EXPENSES THROUGH THE ENVIRONMENTAL COST RECOVERY CLAUSE

GULF POWER COMPANY ("Gulf Power", "Gulf", or "the Company"), by and through its undersigned counsel, and pursuant to Section 366.8255(1)(d)7 of the Florida Statutes as amended during the 2002 Florida legislative session and Florida Public Service Commission ("Commission") Order Nos. PSC-94-0044-FOF-EI and PSC-94-1207-FOF-EI, hereby petitions this Commission for approval of the "Agreement for the Purpose of Ensuring Compliance with Ozone Ambient Air Quality Standards" ("Ozone Agreement") entered into on August 28, 2002 between the Florida Department of Environmental Protection ("FDEP") and Gulf Power as a new program for cost recovery through the Environmental Cost Recovery Clause ("ECRC"). As grounds for the relief requested by this petition, the Company would respectfully show:

(1) Notices and communications with respect to this petition and docket should be addressed to:

Jeffrey A. Stone
Russell A. Badders
Beggs & Lane
P. O. Box 12950
Pensacola, FL 32591-2950

Susan D. Ritenour
Assistant Secretary and Assistant Treasurer
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0780

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(2) Gulf is a corporation with its headquarters located at 500 Bayfront Parkway, Pensacola, Florida 32501. The Company is an investor-owned electric utility operating under the jurisdiction of this Commission.

(3) Gulf owns and operates the Crist Plant generating facility in Escambia County, Florida. This plant generates electricity for the consuming public through the combustion of fossil fuels. The combustion of fossil fuels produces nitrogen oxides ("NO_x"), which are some of the precursor compounds that contribute to the formation of ozone in the ambient air. The Crist Plant currently satisfies all federal and state air emissions requirements, including those applicable to NO_x.

(4) Under the authority of the Clean Air Act, the United States Environmental Protection Agency ("USEPA") promulgated regulations dealing with air quality, including ambient air quality standards designed to protect human health and welfare. One such regulation places a limit on the amount of ozone that is considered to be acceptable in the ambient air during any 8-hour period ("Ozone Standard"). Based upon the best available information, including ambient air quality monitoring data, FDEP does not expect Escambia and Santa Rosa Counties to be in compliance with the Ozone Standard in 2004/2005 unless significant reductions of emissions of ozone precursor compounds are achieved in the Pensacola, Florida Metropolitan Planning Area ("PFMPA").

(5) In its 2002 session, the Florida legislature adopted amendments to section 366.8255(1)(d) of the Florida Statutes to provide that an electric utility may seek recovery of costs and expenses prudently incurred pursuant to a voluntary agreement with FDEP or USEPA, for the purpose of ensuring compliance with ozone ambient air quality standards. The

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legislation, which was sponsored in the Florida House by Representative Jerry Maygarden of Pensacola and in the Florida Senate by Senator Charlie Clary of Destin, and was supported during the legislative session by FDEP Secretary David Struhs and Florida Governor Jeb Bush, was signed into law by Governor Bush on May 23, 2002. In order to qualify for recovery through the ECRC, the agreement between the electric utility and the qualifying environmental agency for the purpose of ensuring compliance with ozone ambient air quality standards must be entered into on or after May 23, 2002 and prior to October 1, 2002.

(6) Representatives of FDEP and Gulf have met and arrived at a mutual agreement in furtherance of the purposes of Section 366.8255(1)(d)7 of the Florida Statutes as amended by Chapter 2002-276 of the Laws of Florida. A copy of the resulting Ozone Agreement, which was signed by the parties on August 28, 2002, is attached to and made a part of this petition as Appendix A.

(7) The Ozone Agreement calls for Gulf Power to make changes in its equipment and/or operations at Plant Crist. Such changes are designed to reduce the overall NO_x emission rate at the plant as part of a community wide effort to reduce ozone precursor compounds in the PFMPA. When fully implemented, the Ozone Agreement will limit the overall 30 day average NO_x emission rate at Plant Crist to 0.2 lbs./mmbtu year-round except for periods in which Crist Unit No. 7 ("Crist 7") is offline.¹ The predominant change envisioned by the agreement is the

¹ As the largest and most efficient of seven generating units at Plant Crist, Crist 7 is generally the economic choice to be operated. Whenever Crist 7 is offline, there is a greater reduction in NO_x emissions than would otherwise result from operating Crist 7 with the new SCR. Since NO_x reduction is the goal, the Ozone Agreement recognizes that the emission rate limit is not necessary when Crist 7 is not operating.

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addition of Selective Catalytic Reduction (“SCR”) technology to Crist 7 by May 1, 2005.² In addition to the NO_x emission reductions that will occur as a result of the installation and operation of the Crist 7 SCR project, the Ozone Agreement also calls for further reductions in NO_x emissions through the addition of NO_x reduction technologies on one or more of the other coal-fired units at Plant Crist. The selection and installation of one or more additional NO_x reduction technologies for one or more of the other units will follow engineering studies conducted as part of the Ozone Agreement.³ The engineering studies contemplated by the Ozone Agreement are intended to produce unit specific cost and performance data that will allow Gulf to make a decision between various alternatives based on the relative cost-effectiveness of each technology. To augment the NO_x reductions envisioned from the addition of the NO_x reduction technologies discussed above, the Ozone Agreement also calls for the retirement of the three oldest Crist generating units (Crist 1, Crist 2 and Crist 3) by May 1, 2006.

(8) As shown in the graph set forth in Appendix B to this petition, the annual NO_x emission reductions envisioned by the Ozone Agreement, as compared to 1999 baseline data, are equivalent to a result that could otherwise be achieved by the installation of SCR technology on both Crist 7 and Crist 6. The flexibility to study other alternatives for achieving an overall plant

² Due to structural interference and performance concerns for the new SCR, the Ozone Agreement also calls for a new Crist 7 precipitator to be constructed at a new location in order to allow the new SCR to be built in the location of the old Crist 7 precipitator. The new SCR will be completed one year after construction of the new precipitator is completed.

³ The deadline for installing other selected NO_x reduction technologies is May 1, 2006 unless the cost effective choice is determined to be SCR technology for Crist 6. If SCR for Crist 6 is selected, the deadline for installation will be December 31, 2007. The Ozone Agreement calls for Gulf to obtain written concurrence from FDEP before implementing NO_x reduction technology or technologies on one or more of the remaining coal-fired units at Plant Crist. The written concurrence from FDEP will specify that the use of the selected technology or technologies is reasonable and necessary to achieve the overall plantwide emission rate of 0.2 lbs/mmBtu specified in the Ozone Agreement.

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wide btu weighted average NO_x emission rate of 0.2 lbs/mmbtu may allow Gulf to avoid the cost of installing SCR technology on Crist 6 for a net savings of as much as \$50 million or more.

(9) Gulf seeks approval of the Ozone Agreement as an environmental compliance program/activity appropriate for recovery through the ECRC pursuant to the amendments to the Florida Statutes contained in Chapter 2002-276 of the Laws of Florida. This new program is appropriate for ECRC recovery based on the provisions of Section 366.8255(1)(d)7 of the Florida Statutes and the prior orders of the Commission implementing the ECRC.

(10) The Company's expenses and/or expenditures associated with the activities discussed in the Ozone Agreement are not recovered through any other cost recovery mechanism or through base rates. These new activities were not included in the Company's last test year forecast upon which its current base rates were established. As a result, the expenditures and/or expenses associated with these activities will be incurred separate and apart from the expenditures and/or expenses for activities that were approved in the Company's last test year forecast upon which rates are based.

(11) Gulf is not requesting a change in the ECRC factors as part of this petition. The projected expenditures and expenses will be reflected in subsequent true-up and/or projection filings submitted as part of the ongoing docket addressing the ECRC. The actual expenditures made and expenses incurred by the Company will be addressed in subsequent ECRC filings and will be subject to audit.

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(12) The parties to the Ozone Agreement acknowledge that the NO_x reduction activities identified therein are conditioned upon timely approval by this Commission for cost recovery through the ECRC. Given that substantial expenditures must be undertaken early in 2003 in order to meet the deadlines set forth in the Ozone Agreement, it is imperative that Gulf obtain an order from this Commission authorizing Gulf to recover the costs incurred pursuant to this agreement through the Environmental Cost Recovery Clause that is rendered final within 90 days of the execution of the agreement.⁴ If a final order is not rendered within 90 days of the date of execution of this agreement, the parties concur that the dates and schedules set forth in the Ozone Agreement are subject to revision solely by mutual agreement of the parties in order to allow Gulf to move forward with the activities described therein above pending a final order by the FPSC. If a final order is not rendered within 120 days of execution of this agreement, the entire agreement automatically becomes null and void unless extended by mutual written agreement of the parties within 30 days thereafter. The net effect of these provisions is that delay in final rendition of an order approving the request made by this petition beyond the end of this year will either result in delay of the NO_x emission reductions contemplated by the Ozone Agreement or cancellation of the agreement altogether. Either result will frustrate the intent underlying enactment of Chapter 2002-276 of the Laws of Florida which is to enable communities such as the PFMPA to avoid becoming classified as non-attainment areas for ozone ambient air quality standards with the consequential effects that may include imposition of emission caps that could limit expansion of business and industry, addition of required vehicle emission testing, and federal road funding cutbacks. As a result, Gulf respectfully requests that

⁴ A final order is one that is no longer subject to review or appeal by a court of competent jurisdiction.
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the Commission take this petition up for consideration as Proposed Agency Action at the earliest opportunity. Towards that end, Gulf respectfully suggests that a Commission decision on this petition as Proposed Agency Action at the Commission Conference scheduled for October 1, 2002 followed by expedited entry of a PAA order would allow the traditional 21 day period for substantially affected parties to request a hearing to run in time for the Commission to hold a hearing, if requested, on November 20-22, 2002 as part of the proceedings in Docket No. 020007-EI related to the ECRC. Absent a request for hearing, such a PAA order will become final and begin the time for a substantially affected party to file a notice of appeal. If no such notice is filed, the resulting order will be rendered final and no longer subject to review or appeal within the deadlines specified by the Ozone Agreement. If a request for hearing is filed by an appropriate party, a Commission decision could still be issued and made final in the absence of an appeal before the Ozone Agreement would be rendered null and void by its own terms.

WHEREFORE, Gulf Power Company respectfully requests the Commission to approve the "Agreement for the Purpose of Ensuring Compliance with Ozone Ambient Air Quality Standards" entered into on August 28, 2002 between the Florida Department of Environmental Protection and Gulf Power Company and the costs associated therewith for recovery through the

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Environmental Cost Recovery Clause consistent with this petition, and that such approval and authorization be set forth in a Proposed Agency Action order issued by the Commission at the earliest practical opportunity or grant such other relief as is just and reasonable.

Respectfully submitted the 29th day of August, 2002.



JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 7455

Beggs & Lane

501 Commendencia Street

P. O. Box 12950

Pensacola, Florida 32591-2950

(850) 432-2451

Attorneys for Gulf Power Company

**AGREEMENT FOR THE PURPOSE OF ENSURING
COMPLIANCE WITH OZONE AMBIENT AIR
QUALITY STANDARDS**

This agreement is entered into by the Florida Department of Environmental Protection (DEP) and Gulf Power Company (GULF), for the exclusive purposes as follows: (a) ensuring that GULF's electrical generating facility located within the Pensacola, Florida Metropolitan Planning Area (PFMPA) supports the Area's compliance with the eight hour ozone ambient air quality standard and (b) authorizing related cost recovery pursuant to Section 366.8255(1)(d) of the Florida Statutes as amended by the Florida Legislature in its 2002 session and signed into law by the Governor of the State of Florida.

WHEREAS:

I. GULF owns and operates the Crist Plant electrical generating facility in Escambia County, Florida. This plant generates electricity for the consuming public through the combustion of fossil fuel. The combustion of fossil fuels produces some of the precursor compounds that contribute to the formation of ozone in the ambient air.

II. Under the authority of the Clean Air Act, the U. S. Environmental Protection Agency (EPA) promulgated regulations dealing with air quality, including ambient air quality standards designed to protect human health and welfare. One such regulation places a limit on the amount of ozone that is considered to be acceptable in the ambient air during any 8-hour period (Ozone Standard).

III. Based upon the best available information, including ambient air quality monitoring data, DEP does not expect Escambia and Santa Rosa Counties to be in compliance with the Ozone Standard in 2004/2005 unless significant reductions of emissions of ozone precursor compounds are achieved in the Pensacola, Florida Metropolitan Planning Area.

IV. In its 2002 session, the Florida legislature adopted amendments to section 366.8255(1)(d) of the Florida Statutes to provide that an electric utility may seek recovery of costs and expenses prudently incurred pursuant to a voluntary agreement with DEP or EPA, for the purpose of ensuring compliance with ozone ambient air quality standards.

V. Representatives of DEP and GULF have met and arrived at a mutual agreement in furtherance of the purposes of Section 366.8255(1)(d)7 of the Florida Statutes as amended during the 2002 Florida legislative session.

VI. DEP and GULF concur that installation of Selective Catalytic Reduction (SCR) controls at Crist Unit #7 as well as the implementation of other NO_x reduction

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technologies on one or more of the other three coal-fired generating units at Plant Crist will be needed as part of a community wide effort to reduce ozone precursor compounds in the Pensacola Metropolitan Planning Area. Due to structural interference and performance concerns for the new SCR, a new Unit #7 precipitator will also be constructed at a new location and the SCR will be completed one year later in the location of the old Unit #7 precipitator.

VII. It is anticipated that the implementation of this agreement will result in an approximately 61% reduction [9,188 tons] in annual NO_x emissions from the GULF Crist Plant based upon 1999 baseline data.

NOW THEREFORE, in consideration of the premises and the mutual agreements contained herein, and intending to be legally bound, the DEP and GULF hereby agree as follows:

1. By May 1, 2005, GULF, after obtaining necessary permits and approvals, will install and begin and continue operating an SCR system at Crist Unit #7 whenever the Crist Unit #7 is online. The SCR system is designed to achieve no less than an 85% reduction in the quantity of nitrogen oxides as measured at the SCR unit inlet (SCR Project). The SCR Project includes the installation of a new precipitator necessary to structurally accommodate installation of the SCR. See Exhibit "A" for proposed project schedule.
2. In addition to the Crist Unit #7 SCR Project, and in order to achieve an overall plant wide Btu weighted average of 0.2 lbs/mmbtu NO_x emission rate as further specified in paragraph 3 below, Gulf agrees to conduct engineering studies on the feasibility of other NO_x reduction technologies on one or more of the remaining three coal-fired units at Plant Crist. Such studies and related unit specific demonstration projects may include (but are not limited to) SCR, Selective Non-Catalytic Reduction (SNCR) technology, Over-Fired Air (OFA) technology, natural gas reburn technology, selective use of biomass fuel, etc. Gulf further agrees to complete these studies by May 1, 2005. In the event GULF identifies an SCR project for Crist Unit #6 as the NO_x reduction technology, GULF will implement, begin and continue operating the SCR on Crist Unit #6 as described in paragraph 3 below by December 31, 2007. In the event GULF identifies a NO_x reduction technology other than SCR on Crist Unit #6, GULF will select and implement one or more NO_x reduction technologies on one or more of the three other Plant Crist coal-fired units by May 1, 2006. GULF will obtain written concurrence from DEP, before implementing such NO_x reduction technology or technologies, that the use thereof is reasonable and necessary to achieve the overall plantwide emission rate of 0.2 lbs/mmbtu specified in paragraph 3 below.

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3. GULF will make necessary changes identified and within the timeframes set forth in paragraph 2 above, that will allow it to limit the overall 30 day average NO_x emission rate at the Crist Plant to 0.2 lbs./mmbtu year-round except for periods in which Crist Unit #7 is offline. The emission rate shall be calculated pursuant to the formula set forth in Exhibit "B" to this agreement. While Crist Unit #7 is online, this 0.2 lbs./mmbtu will be achieved by utilizing the SCR system on Crist Unit #7 [discussed in paragraph 1 above] and the controls identified pursuant to paragraph 2 above. During such time as Crist Unit #7 may be offline between May 1 and September 15, GULF agrees to operate any NO_x reduction technology or technologies DEP may have determined to be reasonable and necessary at other Plant Crist coal-fired units, pursuant to paragraph 2 above, unless prevented from doing so by circumstances beyond its reasonable control.
4. In addition to the NO_x emission rate reduction strategies implemented pursuant to paragraphs 1 through 3 above, as a further part of this agreement to support the PFMPA's compliance with the eight hour ozone ambient air quality standard, GULF agrees to retire Crist Unit #1 within 120 days of receiving a final order from the Florida Public Service Commission as provided in paragraph 8 below. In addition, GULF further agrees to retire Crist Unit #2 and Crist Unit #3 on or before May 1, 2006.
5. In the event state or federal law changes to require a change in NO_x emissions or the PFMPA is declared non-attainment for ozone, any reduction requirements would be in accordance with all applicable state and federal requirements. In addition, although Florida currently has no state statute providing for NO_x trading or credits, GULF shall be entitled to retain all NO_x reduction credits and trading rights that may be authorized by Florida law in the future.
6. In the event the FPSC issues a final order authorizing GULF to recover costs incurred pursuant to this agreement, by July 5, 2004, GULF will submit a Title V renewal application to the Department's Bureau of Air Regulation, 2600 Blair Stone Rd, MS 5500, Tallahassee, FL 32399 to incorporate the control technologies contained in this agreement as well as the NO_x emission rate as described in paragraphs 1 through 3 above. DEP concurs that the changes envisioned by this agreement will not constitute "modifications" that trigger New Source Review.
7. DEP concurs that the steps and changes described in paragraphs 1 through 4 above are prudent for purposes of (a) ensuring that GULF's electrical generating facility located within the PFMPA supports the Area's compliance with the eight hour ozone ambient air quality standard and (b) authorizing

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related cost recovery pursuant to Section 366.8255(1)(d) of the Florida Statutes as amended by the Florida Legislature in its 2002 session and signed into law by the Governor of the State of Florida.

8. This agreement is based upon the assumption that an order from the Florida Public Service Commission (FPSC) authorizing GULF to recover the costs incurred pursuant to this agreement through the Environmental Cost Recovery Clause is rendered final (final order) within 90 days of the execution of the agreement. A final order is one that is no longer subject to review or appeal by a court of competent jurisdiction. If a final order is not rendered within 90 days of the date of execution of this agreement, the parties concur that the dates and schedules herein are subject to revision solely by mutual agreement, in order to allow GULF to move forward with the activities described in paragraphs 1-4 above pending a final order by the FPSC. Gulf will exercise good faith in seeking approval of such cost recovery from the FPSC in a timely manner. DEP will support the efforts of GULF before the FPSC and in any subsequent review or appeal. If a final order is not rendered within 120 days of execution of this agreement, the entire agreement shall automatically become null and void unless extended by mutual written agreement of the parties within 30 days thereafter.
9. This agreement shall bind the parties hereto and those whom they represent and may be modified only in writing with the consent of both parties.
10. This agreement is entered into and effective on the date of the last signature of the parties below.

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

By: David B. Struhs
David B. Struhs
Secretary

Date: August 28, 2002

GULF POWER COMPANY

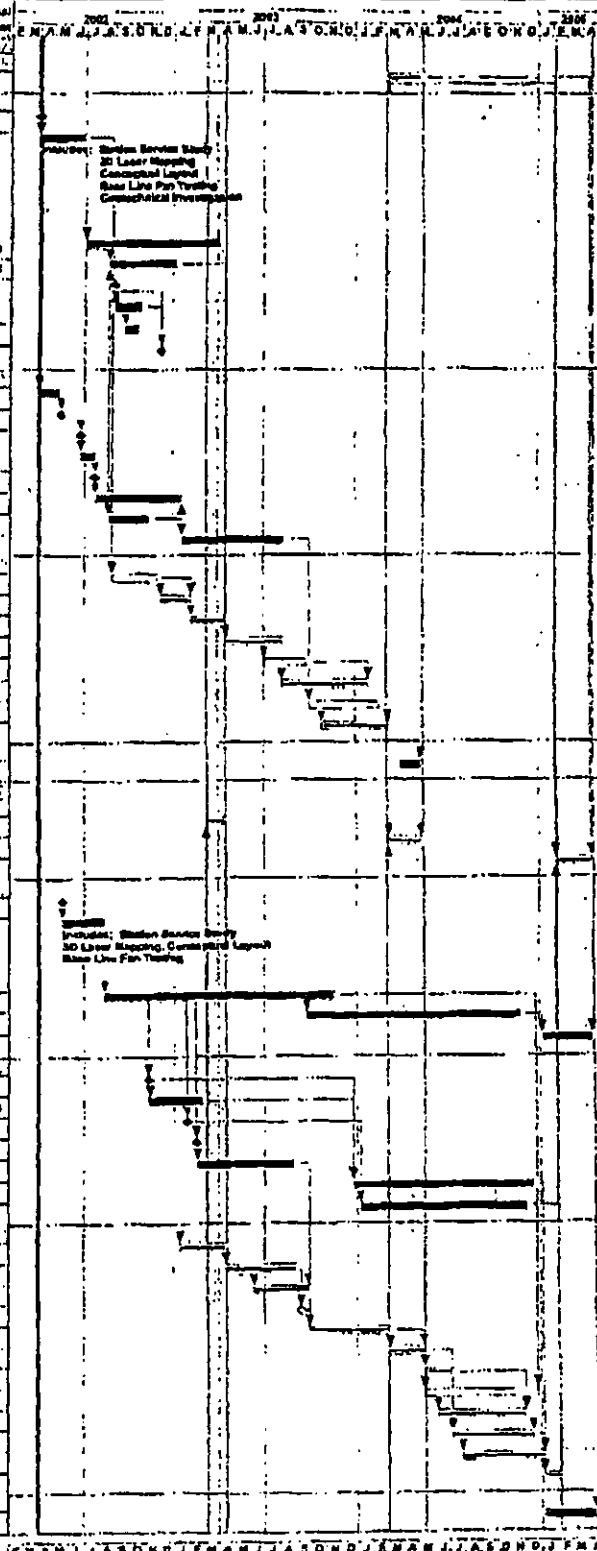
By: Thomas A. Fanning
Thomas A. Fanning
President and Chief Executive Officer

Date: August 28, 2002

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NO_x AGREEMENT

EXHIBIT "A"

Activity ID	Activity Description	Qty	Esty	Esty	Esty	Total
ID	Description	Bar	Start	Start	Start	Rate
CONSTRUCTION						
CON100	Preceptor Fabric	10	01MAY02	01MAY02		0
ENGINEERING						
ENG001	Project Start	0	01APR02			0
ENG002	Preliminary Engineering	60	01APR02	25JUN02		0
ENG100	Final Engineering Design and Support Fabric	204	01JUL02	02APR03		19
ENG101	DCS Design Document and Support	100	20AUG02	04JAN03		78
ENG102	Receive Foundation Info from Preceditor Vendor	0	02SEP02			0
ENG103	SCS Design Pile and Foundations	40	02SEP02	25OCT02		0
ENG104	SCS Prepare Pile Bidding Guide	20	23SEP02	18OCT02		0
ENG105	Award Pile Contract	0	08NOV02			0
PROCUREMENT						
PRO100	Final Fabric for Preceptor Design and Supply	30	01APR02	17MAY02		0
PRO101	Issue Preceptor Inquiry for Bids	0		17MAY02		0
PRO102	Receive Preceptor Bids	0		24MAY02		0
PRO103	Evaluate Preceptor Bids	20	24MAY02	23JUL02		0
PRO104	Award Preceptor Design and Supply	0		23JUL02		0
PRO105	Vendor Design Preceptor	120	23JUL02	17JAN03		0
PRO106	Final Modeling - Preceptor	80	20AUG02	11NOV02		18
PRO107	Preceptor - Fabricate and Deliver	130	16JAN03	09AUG03		65
CONSTRUCTION						
CST100	Relocators	80	28AUG02	20NOV02		2
CST101	Install Pile	80	04DEC02	05FEB03		0
CST102	Install Pile Caps	20	07FEB03	15APR03		0
CST103	Install Pile and Ductwork Support Steel	80	17APR03	09AUG03		0
CST104	Install Ductwork	80	03JUL03	24SEP03		0
CST105	Install Preceptor Box	120	07AUG03	21JAN04		0
CST106	Install Preceptor Mechanical Equipment	100	02OCT03	17FEB04		0
CST107	Install Preceptor Control System	100	27OCT03	05MAR04		0
STARTUP						
SU100	Checkout and Start Up	40	31MAR04	09MAY04		0
SCR CATALYTIC REDUCTION						
CONSTRUCTION						
CON100	SCR Relocators Design	30	05MAY02	11APR03		0
CON101	Building Relocators Collaps	80	05MAY02	09MAY03		0
CON102	SCR Thru Collaps	70	05FEB03	13APR03		0
ENGINEERING						
ENG000	Project Start	0	20MAY02			0
ENG001	Preliminary Engineering	60	20MAY02	06AUG02		0
ENG100	Final Engineering Design	340	12AUG02	20NOV02		0
ENG101	Construction Support	320	24SEP02	23NOV03		0
ENG102	Design Support	100	04JAN03	13APR03		0
PROCUREMENT						
PRO100	Award Catalyst	0		06NOV02		13
PRO101	Final Modeling	80	11NOV02	28FEB03		27
PRO102	Award ID Fans and Motors	0		26JAN03		44
PRO103	Award Ductwork Steel	0		14FEB03		21
PRO104	Fabricate and Deliver Structural Steel	140	17FEB03	20AUG03		21
PRO105	Fabricate and Deliver Catalyst	270	20FEB03	10DEC03		13
PRO106	Fabricate and Deliver ID Fans and Motors	250	06JAN03	02DEC03		44
CONSTRUCTION						
CST100	Relocators	70	13JAN03	11APR03		0
CST101	Install Pile	100	14APR03	20AUG03		0
CST102	Install Pile Caps	80	06JAN03	20MAY03		0
CST103	Award General Construction	0		12MAY03		10
CST104	Install Ductwork Steel	120	28SEP03	02MAY04		0
CST105	Structural Fabricate and Deliver	50	07JAN04	10MAY04		0
CST106	Install Steel to Receptor Level	80	11MAY04	05JUL04		0
CST107	Install Remaining Steel	104	11MAY04	24DEC04		7
CST108	Install Receptor Box	120	06JAN04	28NOV04		0
CST109	Install Mechanical Systems	110	08JUL04	10DEC04		0
CST110	Install Electrical Systems	110	28JUL04	04JAN05		0
CST111	Final Catalyst	21	06JAN05	02FEB05		0
STARTUP						
SU100	Checkout and Start Up	100	04JAN05	13APR05		0



**AGREEMENT FOR THE PURPOSE OF ENSURING
COMPLIANCE WITH OZONE AMBIENT AIR
QUALITY STANDARDS**

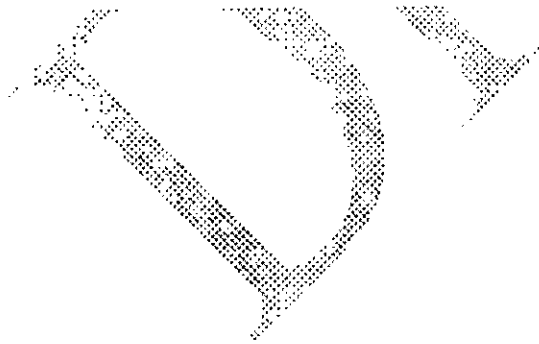
Exhibit "B"

Gulf will measure its compliance with the emission rate limit set forth in paragraph 3 of this agreement by determining the Plant Crist NO_x emission rate, when Crist Unit #7 has operated for 30 sequential days (which need not be consecutive) on a generating unit-specific btu weighted average basis pursuant to the following formula:

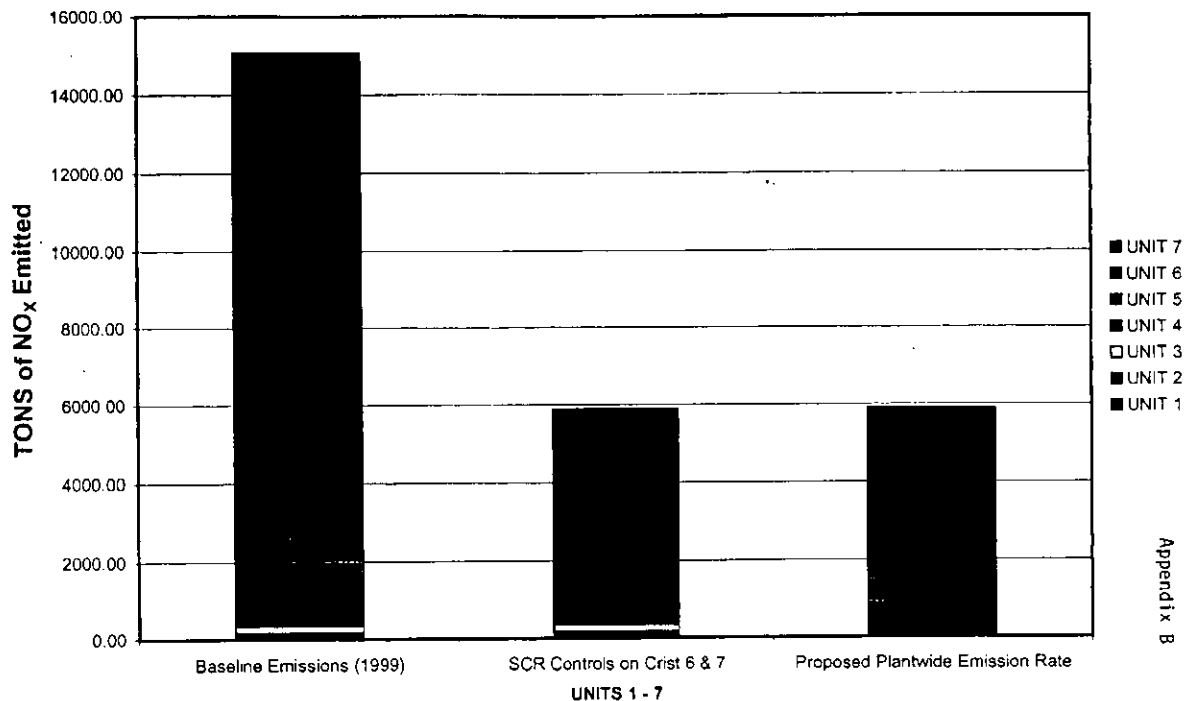
$$\begin{array}{l} \text{plant wide} \\ \text{daily} \\ \text{mmbtu} \\ \text{weighted} \\ \text{NO}_x \text{ rate} \end{array} = \frac{\sum_{\substack{\text{Units} \\ 4, 5, 6, 7}} \left[\left(\text{Unit \# daily mmbtu} \right) \times \left(24 \text{ hour avg unit \# NO}_x \text{ CEMs rate} \right) \right]}{\sum_{\substack{\text{Units} \\ 4, 5, 6, 7}} \left(\text{Unit \# daily mmbtu} \right)}$$

For the purposes of this calculation, a Crist Unit #7 operating day means any calendar day that Crist Unit #7 is online a minimum of 18 hours.

Unit # daily mmbtu (heat input) in the foregoing formula is determined by Plant Crist's daily as-burned fuel analysis



Comparison of Crist Plant Emission Reduction Alternatives



SECTION 4. APPENDIX NA

NO_x AGREEMENT

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of FDEP/Gulf Power agreement pursuant to Section 366.8255(1)(d)7 of the Florida Statutes for purposes of cost recovery of the related expenditures and expenses through the Environmental Cost Recovery Clause.

Docket No. 02____-EI

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing has been furnished this 29th day of August 2002 by U.S. Mail or hand delivery to the following:

Marlene Stern, Esquire
Staff Counsel
FL Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0863

Joseph A. McGlothlin, Esquire
McWhirter Reeves, P.A.
117 S. Gadsden Street
Tallahassee FL 32301

John T. Butler, Esquire
Steel, Hector & Davis LLP
200 S. Biscayne Blvd., Ste 4000
Miami FL 33131-2398

John W. McWhirter, Esquire
McWhirter Reeves, P.A.
400 N Tampa St Suite 2450
Tampa FL 33602

John Roger Howe, Esquire
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., Room 812
Tallahassee FL 32399-1400

Ms. Debra Swim
LEAF
1114 Thomasville Rd, Suite E
Tallahassee FL 32303

Lee L. Willis, Esquire
Ausley & McMullen
P. O. Box 391
Tallahassee FL 32302

[Handwritten Signature]
JEFFREY A. STONE
Florida Bar No. 325953
RUSSELL A. BADDERS
Florida Bar No. 0007455
Beggs & Lane
P. O. Box 12950
Pensacola FL 32591-2950
850 432-2451
Attorneys for Gulf Power Company

SECTION 4. APPENDIX SC
STANDARD CONDITIONS

Unless otherwise specified by permit or rule, the following conditions apply to all emissions units and activities at this facility.

EMISSIONS AND CONTROLS

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Unless otherwise specified in the permit, excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
7. **General Visible Emissions:** Unless otherwise specified in the permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. [Rule 62-296.320(4)(b)1, F.A.C.]
8. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

9. **Required Number of Test Runs:** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
10. **Operating Rate During Testing:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted

SECTION 4. APPENDIX SC
STANDARD CONDITIONS

capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

11. **Calculation of Emission Rate:** For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
12. **Test Procedures:** Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. **Required Sampling Time.** Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - b. **Minimum Sample Volume.** Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. **Calibration of Sampling Equipment.** Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

[Rule 62-297.310(4), F.A.C.]

13. **Determination of Process Variables**

- a. **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

14. **Sampling Facilities:** The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
15. **Test Notification:** The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
16. **Special Compliance Tests:** When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
17. **Test Reports:** The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

SECTION 4. APPENDIX SC
STANDARD CONDITIONS

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

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

RECORDS AND REPORTS

18. **Records Retention:** All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
19. **Annual Operating Report:** The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

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:

Ms. Penny Manuel
 Vice President and SPO
 Gulf Power Company
 One Energy Place
 Pensacola, Florida 32520

2. Article Number

(Transfer from service label)

7000 1670 0013 3110 1496

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Handwritten Signature]

Agent

Addressee

B. Received by (Printed Name)

JANIE BAKELY

C. Date of Delivery

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D. Is delivery address different from item 1? Yes

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 Gulf Power Company
 One Energy Place
 Pensacola, Florida 32520

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