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CERTIFIED MAIL

BUREAU OF AIR REGULATION

March 13, 2006

Robert Bull
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road, M.S. #5505
Tallahassee, FL 32399-2400

RE: Crist Electric Generating Plant
Proposed Units 4 & 5 SNCR Construction Permit
Draft Air Permit No. 0330045-013-AC
Certified Mail Number: 7004 2890 0000 3134 2272

Dear Mr. Bull,

Please find enclosed Gulf Power's response to FDEP's proposed construction permit for the installation and operation of the Crist Units 4 & 5 SNCR systems.

We appreciate your efforts to work with us regarding the startup of the Crist emission control systems. Please call me at (850) 444-6537 regarding any additional questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads "Allison Little".

Allison N. Little, EIT
Gulf Power Company
Engineer III

Cc: w/att
Jim Vick, Gulf Power Environmental Affairs
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Greg Terry, Gulf Power Company
David Hollinger, Southern Company Services
Angela Morrison, Hopping, Green & Sams
Sandra Veazey, Florida Department of Environmental Protection

GULF POWER COMPANY
Plant Crist Unit 4 & 5 SNCR Draft Permit Comments
Air Construction Permit: 0330045-013-AC

Technical Evaluation and Preliminary Determination

Page 2 of 6 under Background

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.

Page 4 of 6 under Boiler

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".

Page 5 of 6 under Design Specifications, Ammonia Slip

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.

Page 5 of 6 under Conclusion

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.

Section 3 Emissions Unit Specific Conditions

Page 5 of 7

1) Condition 3. In the permitting note

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.

2) Condition 3. In the permitting note

Replace: When ammonia measurements in the flue gas are required, FTIR 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.

3) Condition 3. In the permitting note

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.

4) Condition 5.

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.

1) Item 8.

Second to last sentence should include SNCR on Unit 6. Replace with the following:

The plant-wide NOx 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.

2) Item 10

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.