

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

October 28, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gene L. Ussery, Jr., Vice President of Power Generation
Gulf Power
One Energy Place
Pensacola, Florida 32520

Re: **Request for Additional Information**
Project No. 0330045-004-AC
Crist Units 4 and 5, Biomass Project

Dear Mr. Ussery:

On October 24, 2002, the Department received your request for an air construction permit to authorize the field-testing of "biomass" (wood chips, switchgrass, sawdust and sander dust) in Units 4 and 5 at the Crist Electric Generating Plant. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below.

1. Your request states that, "Gulf Power believes that no increases in emissions will occur for the testing and use of biomass fuels because the amounts of sulfur, nitrogen, and particulate is lower in biomass than in the coal it will be replacing."
 - a. To support this statement, please provide the following information: lower and higher heating values (Btu/lb), sulfur, nitrogen, ash, moisture, fluorides, lead, and mercury (in terms of percent by weight for all). Compare these values with existing values from coal currently being fired in these units.
 - b. Estimate emissions of carbon monoxide (CO), nitrogen oxides (NOx), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), sulfuric acid mist (SAM), fluorides (F1), lead (Pb), and mercury (Hg). Please provide references for the estimates and report emissions in terms of lb/MMBtu heat input, lb/hour, and tons per year. Compare the annual emissions estimate with the emissions form comparable coal firing. Does the proposed project trigger PSD preconstruction review?
 - c. Please explain the mechanism by which NOx emissions will be reduced 3-5%. Is this a 3-5% reduction from actual emissions or from permit allowable emissions? If based on actual emissions, what is the reference for the current coal-fired NOx emission rate in terms of lb/MMBtu? What is the averaging period? If NOx emissions are expected to decrease, what is expected for CO emissions?
 - d. Units 5 and 6 have electrostatic precipitators (ESP) to control emissions of particulate matter. These units are typically designed for a certain fuel that will produce particles within a known size range and of a given resistivity. Please provide information that shows the particle size range and resistivity from firing the proposed "biomass" fuels is within the original design range of the ESPs. Will there be an increase in particulate matter emissions from firing "biomass"?
2. Historically, the addition of wood and other plant-based materials as fuels for existing coal-fired boilers have caused several problems related to storage, handling, and charging. Please describe how the "biomass" materials will be brought to the site, unloaded, stored at the site, and charged into the units. What additional equipment and measures must be taken to adjust to "biomass" as a new fuel?

"More Protection, Less Process"

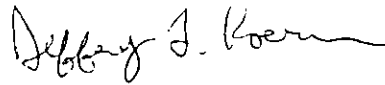
Printed on recycled paper.

3. For the ten-month test period, please estimate the total maximum expected firing rates for each fuel (MMBtu per 10 months).

Please provide certification from a Professional Engineer registered in Florida for your initial request and for the additional information requested by the Department [Rule 62-4.050(3), F.A.C.]. The Department notes that your request is to begin field-testing on November 18, 2002. Once the application is complete and if approved, our rules require public notice for such projects with a minimum 14-day public comment period. Please submit the requested additional information as soon as possible so that the Department can attempt to meet your proposed schedule.

The Department will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information. If you have any questions, please contact me at 850/921-9536.

Sincerely,



Jeffery F. Koerner
New Source Review Section

AAL/jfk

cc: Mr. G. Dwain Waters, Gulf Power
Ms. Sandra Veazey, NWD Office
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

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, Jr.
 V.P. of Power Generation
 Gulf Power Corporation
 One Energy Place
 Pensacola, FL 32520

2. Article

7001 0320 0001 3692 7744

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

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C. Signature *J. Garner* Agent Addressee

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Sent To: Gene L. Ussery, Jr.
 Street, Apt. No. or P.O. Box: One Energy Place
 City, State, Zip+4: Pensacola, FL 32520

PS Form 3800, January 2001 See Reverse for Instructions

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

OCT 24 2002

DIVISION OF AIR
RESOURCES MANAGEMENT



Certified Mail

October 22, 2002

Al L. Linero
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

RE: CRIST ELECTRIC GENERATING PLANT
BIOMASS PROJECT
PERMIT No: 0330045-001-AV

Thank you for meeting with us on October 3, 2002 regarding the Crist Biomass Renewable Energy Project. Enclosed, pursuant to your request is our research study plan outlining the details of the project along with our determination of no emissions increase. A Responsible Official certification statement is also enclosed. Gulf Power hereby requests a construction permit to conduct field testing beginning on November 18, 2002 to determine the feasibility of the long range use of biomass as a fuel.

If you have any questions regarding this project or the protocol development for the Crist Biomass Renewable Energy Project, please call me at (850) 444.6527.

Sincerely,

A handwritten signature in black ink, appearing to read "Dwain Waters". The signature is written in a cursive style with a long horizontal line extending to the right.

G. Dwain Waters, Q.E.P.
Air Quality Programs Supervisor

cc: w/att: Jim. Vick, Gulf Power Company
Charles Howton, Gulf Power Company
Wright, Terry, Gulf Power Company
John Dominey, Gulf Power Company
Danny Herrin, Southern Company Services
Gary Perko, Hopping, Green & Sams
Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida