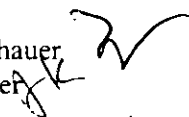



# Memorandum

# Florida Department of Environmental Protection

Permit Signed: 5/2/07

TO: Joseph Kahn

THRU: Trina Vielhauer  
Jeff Koerner 

FROM: Jonathan Holtom 

DATE: April 26, 2007

SUBJECT: Project No. 0330045-015-AC  
Final Construction Permit for Gulf Power Crist  
Installation of a Wet Flue Gas Desulfurization System

Attached for your approval and signature is a final construction permit for Gulf Power's Crist Electric Generating Plant. This permit authorizes Gulf Power Company to construct a Wet Flue Gas Desulfurization system for Units 4 - 7 to reduce sulfur dioxide emissions as part of its plan to comply with the requirements of the Clean Air Interstate Rule.

The Public Notice requirements were met on April 4 by publishing in the Pensacola News Journal. No comments were received from the public in response to this Public Notice, and no petitions were filed for an Administrative Hearing. The applicant did provide minor comments which have been addressed in the Final Determination.

I recommend your approval and signature.

Attachments

TLV/jk/jh

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF FINAL PERMIT

In the Matter of an  
Application for Permit by:

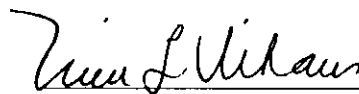
Ms. Penny Manuel, Vice President and SPO  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0328

Air Permit No. 0330045-015-AC  
Crist Electric Generating Plant  
Escambia County

Enclosed is Final Permit Number 0330045-015-AC. This permit authorizes Gulf Power Company to construct a Wet Flue Gas Desulfurization system for Units 4 - 7 to reduce sulfur dioxide emissions as part of its plan to comply with the requirements of the Clean Air Interstate Rule. This permit 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 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

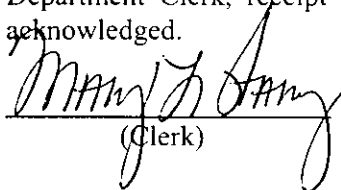
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Determination and the Final Permit) was sent by e-mail with return receipt requested before the close of business on 5/2/07 to the persons listed:

Ms. Penny M. Manuel, Gulf Power Company ([pmmanuel@southernco.com](mailto:pmmanuel@southernco.com))  
Mr. G. Dwain Waters, Gulf Power Company ([gdwaters@southernco.com](mailto:gdwaters@southernco.com))  
Mr. Tom Davis, ECT ([tdavis@ectinc.com](mailto:tdavis@ectinc.com))  
Mr. Rick Bradburn, NWD ([rick.bradburn@dep.state.fl.us](mailto:rick.bradburn@dep.state.fl.us))  
Mr. Gregg Worley, EPA Region 4 ([worley.gregg@epa.gov](mailto:worley.gregg@epa.gov))

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) 5/2/07  
(Date)



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## PERMITTEE

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

### Authorized Representative:

Ms. Penny Manuel, Vice President and SPO

Air Permit No. 0330045-015-AC  
Crist Electric Generating Plant  
Existing Units 4 - 7  
Wet FGD Project  
Permit Expires: December 31, 2010

## PROJECT AND LOCATION

This permit authorizes the construction of a new wet flue gas desulfurization system (FGD) for Units 4 - 7 at the existing Crist Electric Generating Station (SIC No. 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.

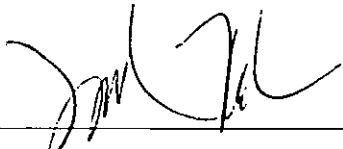
## STATEMENT OF BASIS

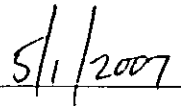
The applicant elects to install a wet flue gas desulfurization system to provide full flexibility in implementing the federal cap and trade program for sulfur dioxides under the Clean Air Interstate Rule (CAIR). Because CAIR affords a regulated facility the flexibility to evaluate market conditions to determine whether it will install controls, operate existing controls, or purchase allowances generated by other plants, the Department of Environmental Protection (Department) does not require the installation of this equipment or its operation.

This air pollution construction permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (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

  
\_\_\_\_\_  
Joseph Kahn, Director  
Division of Air Resource Management

  
\_\_\_\_\_  
(Date)

## FINAL DETERMINATION

Gulf Power Company  
Crist Electric Generating Plant  
Air Permit No. 0330045-015-AC

The Department distributed a public notice package on March 30, 2007, to authorize the installation of a wet Flue Gas Desulfurization (FGD) system for units 4 - 7 at the Gulf Power Crist Electric Generating Plant, which is located on Pate Road, off of 10 Mile Road on Governors Bayou, Escambia County. The Public Notice of Intent to Issue was published in The Pensacola News Journal on April 4, 2007.

### COMMENTS/CHANGES

No public comments were received during the 14-day public comment period; however, comments were received from the Permittee. Those comments and the Department's response are addressed below.

#### **Email from Mr. G. Dwain Waters dated April 16, 2007**

**Comment 1.** Statement of Basis: Permit Cover Page. The description states the purpose as "to provide full flexibility in implementing the federal cap and trade program for nitrogen oxides under the Clean Air Interstate Rule (CAIR)". Gulf requests the words: "nitrogen oxides" be deleted and replaced with "sulfur dioxides" in the statement of basis. The Wet FGD Scrubber system reduces sulfur dioxide in lieu of nitrogen oxides.

**Response 1.** The correction has been made.

**Comment 2.** Section 1. General Information: Facility and Project Description; Page 2 of 6. Please revise the sentence: "Fuel oil is used as supplemental fuel in all four of the units" to: "Natural gas, fuel oil and on-specification used oil are used as supplemental fuels in all four of the units." The revised description more actually reflects the availability of supplemental fuels permitted for the Crist units.

**Response 2.** The requested change has been made.

**Comment 3.** Section 3. Emissions Unit Specific Conditions; Page 4 of 6. The words: "ammonia injection rates" should be deleted in the sentence above the permit note which reads: "Each stack is equipped with continuous monitors for determining opacity, stack gas flow rates and ammonia injection rates, and emissions of carbon dioxide (CO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>) and sulfur dioxides (SO<sub>2</sub>)." Each stack is not equipped with a system to monitor ammonia injection rates. This section appears to describe the existing units and stacks at Plant Crist.

**Response 3.** As written, the paragraph describes the existing stacks and associated monitors for each unit. For clarification, the paragraph is changed as follows:

Under the current configuration, Units 4 and 5 share a common stack that is 450 feet tall with a diameter of 18.0 feet. The combined volumetric flow rate from Units 4 and 5 at permitted capacity is approximately 802,500 acfm with an exit temperature of 290° F. Units 6 and 7 also share a common stack that is 450 feet tall with a diameter of 23.2 feet. The combined volumetric flow rate from Units 6 and 7 at permitted at capacity is approximately 2,463,000 acfm with an exit temperature of 320° F. The ductwork from each unit leading to the existing stacks is equipped with continuous monitors for

## FINAL DETERMINATION

Gulf Power Company  
Crist Electric Generating Plant  
Air Permit No. 0330045-015-AC

determining opacity, stack gas flow rates, ~~and ammonia injection rates~~, and emissions of carbon dioxide (CO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), and sulfur dioxide (SO<sub>2</sub>). The ammonia supply line leading to the Unit 7 SCR system and the urea supply lines leading to the Units 4, 5 and 6 SNCR systems are equipped with flow monitors. Following the completion of this project, the existing stacks will be used during periods of wet FGD bypass operations. Emissions from the new wet FGD system will exhaust through a new stack, as described in Condition 3, below.

**Comment 4.** Section 3. Specific Condition #4 Limestone Handling; Page 5 of 6. The statement: "To the extent practicable, limestone conveyors shall be enclosed and crushing equipment located inside buildings" seems to be vague in how to determine the extent of practicable. The general rule that applies reads: "Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter."

**Response 4.** It is the Department's intent of this requirement to prevent or minimize emissions of additional unconfined particulate matter emissions associated with the operation of this new equipment. To accomplish this, the new crushers are to be located within a building or enclosure and the exposed conveyors are to be covered where possible. We understand that it is not practicable to cover some of the loading/unloading points and that it is difficult to completely contain emissions from drop points and changes in conveyor directions. At the locations where it is not practicable to cover the conveyors due to operational requirements, the plant shall adhere to the precautions that were proposed in the application to prevent emissions of unconfined particulate matter. For clarity, the following condition has been added as Specific Condition 10. The existing Specific Conditions 10 – 13 have been renumbered as 11 – 14.

10. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements:

1) To prevent emissions of unconfined particulate matter while unloading fly ash, ash leaving the facility shall be hauled in closed container trucks. Ash and gypsum being disposed of on plant property shall be mixed with water as needed to reduce fugitive emissions.

2) The plant ash and gypsum haul roads shall be watered as necessary to control any unconfined particulate matter.

3) As sections of the ash and gypsum landfill reach their capacity these sections shall be grassed over to prevent any particulate matter being lifted into the wind.

4) The coal pile shall be packed regularly to help in the prevention of coal pile fires and reduce fugitive dust.

5) A dust suppressant shall be applied to the coal, limestone and gypsum on the conveyor belts as necessary to control dust.

[Rule 62-296.320(4)(c), F.A.C.]

## FINAL DETERMINATION

Gulf Power Company  
Crist Electric Generating Plant  
Air Permit No. 0330045-015-AC

In addition, the following sentence will be added to Specific Conditions 4 and 5:

See Specific Condition 10.

**Comment 5.** Section 3. Specific Condition #5 Gypsum Handling; Page 5 of 6. The statement: "To the extent practicable, conveyors, transporting dewatered gypsum shall be enclosed" seems to be vague in how to determine the extent of practicable. The general rule that applies reads: "Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter."

**Response 5.** See response 4, above.

**Comment 6.** Section 3. Specific Condition #8 Visible Emissions; Page 6 of 6. The opacity limitation should be based on the general opacity standard of 20% in lieu of 5% opacity.

**Response 6.** When operating properly, there should be no emissions from the silo baghouses. A discharge of 20% opacity from a baghouse vent for this activity would suggest a failure of the control system and much higher emissions than indicated in the application. No change is made as a result of this comment.

**Comment 7.** Section 3. Specific Condition #10 (now #11) Wet FGD Bypass; Page 6 of 6. Please revise item a. to reference that startup/shutdown bypass should be per unit per year in lieu of "per year" thus the condition should read: "Such periods of bypass are estimated to be less than 96 hours per unit per year". In addition, item b. references: "Periods of bypass operations shall be documented as specified in Condition 12, below". The reference should be Condition 13, below. Condition 12 references "Project Schedule".

**Response 7.** The Department agrees with this comment and will clarify that the estimate is based on hours per year per unit.

**Comment 8.** Section 3. Specific Condition #11 (now #12). Continuous Monitoring; Page 6 of 6. Gulf Power met with the FDEP Monitoring Group regarding the Crist FGD Monitoring Plan on April 9, 2007. Gulf believes all issues regarding the alternative monitoring plan have been resolved which allows removal of the CEM systems (for state compliance requirements) during bypass operations. Gulf agrees to amend the plan previously submitted to include quarterly QA/QC procedures for the SCR unit with approved methods and agrees to conduct annual NO<sub>x</sub> tests as a QA/QC on the SNCR units to verify the Appendix D matrix after its initial establishment. Gulf will agree to update the SNCR NO<sub>x</sub> matrix before all future Title V renewal submissions (i.e., every 5 years). Gulf will also request to retain the CEM method as an option for bypass should new regulation or compliance initiatives require and/or due to plant election. It is Gulf's interpretation of that the existing language in Specific Condition #11 allows the permittee to obtain a letter of authorization from the Department approving the alternative plan, thus no changes are needed.

**Response 8.** The issuance of an alternate monitoring plan is a separate formal Agency Action (not a letter of authorization) that is not addressed by this air construction permit. Specific Condition 11 (renumbered to 12) will remain an applicable requirement in this permit issuance. If, and when, an

## FINAL DETERMINATION

Gulf Power Company  
Crist Electric Generating Plant  
Air Permit No. 0330045-015-AC

alternate monitoring plan is officially approved, it will be incorporated into the Title V permit at the time of the next revision.

**Comment 9.** Section 3. Specific Condition #13. Scrubber Bypass; Page 6 of 6. Notice to the Compliance Authority of planned maintenance or repair of the scrubber seems contradictory to Specific Condition #9 that states "Operation of the wet FGD system is not required by this permit." In addition, non-planned events may occur which require maintenance or repair that can not be pre-noticed.

**Response 9.** Gulf Power has indicated that the wet FGD system will operate most of the time. The permit condition simply requires a notice prior to bypass for planned maintenance or repair to the control system. Unplanned repairs would fall under the classification of malfunction, which, as stated in Specific Condition 11, is estimated to be less than 96 hours per year. If unable to comply with any condition of the permit as a result of a malfunction, the permittee is required to immediately notify the Department. "Immediately" means the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the incident, excluding weekends and holidays. This is required in Condition 1 of Appendix SC.

**Comment 10.** Additional General Design Comment: Crist will need to operate an alternative ventilation system during the bypass of Units 4 or 5 for boiler maintenance when the scrubber is on-line for other Crist Units. This operation is due to safety concerns for workers who enter the boiler to perform repairs once the boiler is shutdown and all fans are cleared. Gulf proposes to add man safe discharge dampers to isolate the draft to the scrubber for Units 4 and 5 as an alternate ventilation system. Engineering will design small ducts to an old auxiliary stack not currently in use to allow adequate flow of natural draft air through the boiler. Air flow will be regulated by the ID fan inlet dampers. No additional emissions are expected during these boiler outage maintenance periods. Gulf believes that this safety mechanism is needed and does not impact the scrubber design, the operation of the scrubber or the emission estimates previously submitted for the project. Gulf believes this change falls within the scope outlined in Specific Condition # 6 Updated Designs and commits to submitting a final design specification with the location and operation of the man safe dampers and specifics of the auxiliary stack during the construction phase.

**Response 10.** Please provide a complete description of the final design when submitting the Title V revision application at the conclusion of this project. At that time, a description will be added to the Title V permit for the appropriate emissions units.

## CONCLUSION

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

## SECTION 1. GENERAL INFORMATION

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### FACILITY AND PROJECT DESCRIPTION

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

ID	Emission Unit Description
004	Boiler No. 4 (Substitution Phase I and Phase II Acid Rain Unit)
005	Boiler No. 5 (Substitution Phase I and Phase II Acid Rain Unit)
006	Boiler No. 6 (Phase I and Phase II Acid Rain Unit)
007	Boiler No. 7 (Phase I and Phase II Acid Rain Unit)

The permittee will construct a new wet FGD system for Units 4 - 7.

### REGULATORY CLASSIFICATION

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

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.

PSD: The existing facility is a major stationary source of air pollution.

### RELEVANT DOCUMENTS

The following relevant documents are not a part of this permit, but helped form the basis for this permitting action: the permit application and additional information received to make it complete; the Draft Permit; the Department's Technical Evaluation and Preliminary Determination; the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the publication in a newspaper of general circulation; comments on the Draft Permit package; and the Department's Final Determination.



## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The Permitting Authority for this project is the Bureau of Air Regulation in the Division of Air Resource Management of the Department. The mailing address for the Bureau of Air Regulation is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida, 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Department's Northwest District Office. The mailing address for the Northwest District office is: 160 Governmental Center, Suite 308, Pensacola, Florida, 32502-5794. The phone number is: (850) 595-8300.
3. Appendices: The following Appendices are attached as part of this permit: Appendix CF (Citation Format) and Appendix GC (General Conditions); 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, 62-296 and 62-297, 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 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. The application shall be submitted to the Bureau of Air Regulation, with copies to each Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. Wet FGD System for Units 4 – 7

This section of the permit addresses the following existing emissions units.

ID	Emission Unit Description
004	Boiler No. 4 is a Combustion Engineering tangentially fired, dry bottom boiler that began commercial operation on July 1, 1959. It is a Substitution Phase I and Phase II Acid Rain Unit. Authorized fuels include coal, natural gas, new No. 2 fuel oil and/or on-specification used oil. The permitted capacity is 1,096.7 MMBtu per hour. Existing air pollution control equipment includes hot-side and cold-side electrostatic precipitators, low-NO <sub>x</sub> burners, and selective non-catalytic reduction (SNCR).
005	Boiler No. 5 is a Combustion Engineering tangentially fired, dry bottom boilers that began commercial operation on June 1, 1961. It is a Substitution Phase I and Phase II Acid Rain Unit. Authorized fuels include coal, natural gas, new No. 2 fuel oil and/or on-specification used oil. The permitted capacity is 1,096.7 MMBtu per hour. Existing air pollution control equipment includes hot-side and cold-side electrostatic precipitators, low-NO <sub>x</sub> burners, and SNCR.
006	Boiler No. 6 is a Foster Wheeler front wall fired, dry bottom boiler that began commercial operation on May 1, 1970. It is a Phase I and Phase II Acid Rain Unit. Authorized fuels include coal, natural gas, new No. 2 fuel oil and/or on-specification used oil. The permitted capacity is 3,704.8 MMBtu per hour. Existing air pollution control equipment includes a cold-side electrostatic precipitator, low-NO <sub>x</sub> burners, and SNCR.
007	Boiler No. 7 is a Foster Wheeler front and rear wall fired, dry bottom boiler that began commercial operation on August 1, 1973. It is a Phase I and Phase II Acid Rain Unit. Authorized fuels include coal, natural gas, new No. 2 fuel oil and/or on-specification used oil. The permitted capacity is 6,406 MMBtu per hour. Existing air pollution control equipment includes a cold-side electrostatic precipitator, low-NO <sub>x</sub> burners, and selective catalytic reduction (SCR).

Under the current configuration, Units 4 and 5 share a common stack that is 450 feet tall with a diameter of 18.0 feet. The combined volumetric flow rate from Units 4 and 5 at permitted capacity is approximately 802,500 acfm with an exit temperature of 290° F. Units 6 and 7 also share a common stack that is 450 feet tall with a diameter of 23.2 feet. The combined volumetric flow rate from Units 6 and 7 at permitted at capacity is approximately 2,463,000 acfm with an exit temperature of 320° F. The ductwork from each unit leading to the existing stacks is equipped with continuous monitors for determining opacity, stack gas flow rates, and emissions of carbon dioxide (CO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), and sulfur dioxide (SO<sub>2</sub>). The ammonia supply line leading to the Unit 7 SCR system and the urea supply lines leading to the Units 4, 5 and 6 SNCR systems are equipped with flow monitors. Following the completion of this project, the existing stacks will be used during periods of wet FGD bypass operations. Emissions from the new wet FGD system will exhaust through a new stack, as described in Condition 3, below.

*{Permitting Note: Based on the current Title V air operation permit, these units are regulated under Rule 62-296.405, F.A.C. (Fossil Fuel Fired Steam Generators > 250 MMBtu/Hour Heat Input). Units 4 and 5 are regulated as Phase I Substitution and Phase II Acid Rain Units. Units 6 and 7 are regulated as Phase I and Phase II Acid Rain Units.}*

#### PREVIOUS APPLICABLE REQUIREMENTS

1. Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for these emissions units. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070, F.A.C.]

#### EQUIPMENT AND CONSTRUCTION

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. Wet FGD System for Units 4 – 7

2. Wet Flue Gas Desulfurization (FGD) System: The permittee is authorized construct a new wet FGD system to control SO<sub>2</sub> emissions from Units 4 – 7. The system will consist of a large scrubber vessel as well as a number of subsystems for transport and processing flue gas exhaust, limestone, gypsum, other solids, and water. All four boiler exhausts will be directed to the single scrubber reactor where a limestone slurry will be injected to chemically react with sulfur dioxide (SO<sub>2</sub>) in the scrubber vessel for removal as gypsum. The wet FGD system shall be installed, tuned, operated, and maintained as described in the application, approved drawings, plans, and other documents on file with the Department. [Application No. 0330045-015-AC; Design; Rule 62-4.070, F.A.C.]

*{Permitting Note: The wet FGD system is based on the Model CT-121 wet FGD process licensed by Southern Company from Chiyoda Corporation. The preliminary design is for removal of approximately 95% of the SO<sub>2</sub> emissions. In addition, the wet FGD system is expected to: remove an estimated 50% to 70% of the particulate matter emissions; remove an estimated 95% of the hydrogen chloride and hydrogen fluoride emissions; and capture an estimated 80% of the oxidized mercury.}*

3. Flue Gas Handling: The permittee is authorized to construct a new exhaust stack to serve as the common stack for Units 4 - 7 under normal conditions with the wet FGD system in operation. The preliminary design for the new common stack is for the following characteristics: a height of 490 feet; an exit diameter of 35 feet; an exit temperature of 131° F; and an actual volumetric flow rate of 3,282,000 acfm. The two existing stacks for Units 4/5 and Units 6/7 will remain as bypass stacks for: periods of startup and shutdown of Units 4 – 7; malfunction of Units 4 – 7 (any or all) or the wet FGD system; or, repair or scheduled maintenance of the wet FGD system. Under normal operating conditions, the existing stack for Units 4/5 will be used to provide makeup air to the system. [Application No. 0330045-015-AC; Design; Rule 62-4.070, F.A.C.]
4. Limestone Handling: The permittee is authorized to construct a new limestone handling system for the receipt, storage, conveyance, pulverization, and sluicing of limestone. The system will consist of a barge unloader, an open storage pile, feed hoppers, two closed silos, two ball mills, two limestone slurry storage tanks, and associated pumps, valves, instrumentation and piping. The permittee shall install a baghouse on each silo designed to meet a particulate matter emissions specification of 0.01 grains per dry standard cubic feet. New and replacement bags shall be selected that meet this equipment specification. To the extent practicable, limestone conveyors shall be enclosed and crushing equipment located inside buildings. The remainder of the limestone handling system shall be designed, maintained and operated to minimize emissions of fugitive particulate matter by confining, enclosing or wetting (as necessary). See specific condition 10. [Application No. 0330045-015-AC; Design; Rule 62-4.070, F.A.C.]
5. Gypsum Handling: The permittee is authorized to construct a new gypsum handling system to transport, store, dewater, and load for shipment the gypsum produced by the scrubber vessel. The equipment will include tanks, pumps, piping, valves, instrumentation, hydrocyclones, vacuum filters, and conveyors. There will be two vacuum filters with accessories to serve units 4 - 7. To the extent practicable, conveyors transporting dewatered gypsum shall be enclosed. The remainder of the gypsum handling system shall be designed, maintained and operated to minimize emissions of fugitive particulate matter by confining, enclosing or wetting (as necessary). See specific condition 10. [Application No. 0330045-015-AC; Design; Rule 62-4.070, F.A.C.]
6. 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. [Application No. 0330045-015-AC; Design; Rule 62-4.070, F.A.C.]

### EMISSIONS LIMITING AND PERFORMANCE STANDARDS

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. Wet FGD System for Units 4 – 7

7. Emissions Standards and Limitations: This permit does not alter any previous emissions standards or limitations on permitted capacities such as heat input rates, fuel consumption, or hours of operation. It does not authorize any additional fuels or other such methods of operation. The permittee shall comply with all applicable emissions standards and limitations specified in any valid air construction and operation permits. [Application No. 0330045-015-AC; Design; Rule 62-4.070, F.A.C.]
8. Visible Emissions: Visible emissions from the limestone storage silo baghouses shall not exceed 5% opacity. Initial and annual tests shall be conducted in accordance with EPA Method 9 and the test conditions in Appendix SC of this permit. [Rule 62-4.070, F.A.C.]
9. Circumvention: No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. Operation of the wet FGD system is not required by this permit. [Rule 62-210.650, F.A.C.]
10. Emissions of Unconfined Particulate Matter: Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements:
  - 1) To prevent emissions of unconfined particulate matter while unloading fly ash, ash leaving the facility shall be hauled in closed container trucks. Ash and gypsum being disposed of on plant property will be mixed with water as needed to reduce fugitive emissions.
  - 2) The plant ash and gypsum haul roads shall be watered as necessary to control any unconfined particulate matter.
  - 3) As sections of the ash and gypsum landfill reach their capacity these sections shall be grassed over to prevent any particulate matter being lifted into the wind.
  - 4) The coal pile shall be packed regularly to help in the prevention of coal pile fires and reduce fugitive dust.
  - 5) A dust suppressant shall be applied to the coal, limestone and gypsum on the conveyor belts as necessary to control dust.

[Rule 62-296.320(4)(c), F.A.C.]

### **BYPASS OPERATION**

11. Wet FGD Bypass: In accordance with the manufacturer's recommended procedures, the permittee intends to bypass the wet FGD system under the following conditions.
  - a. During startup or shutdown of Units 4 – 7, or malfunction of any of the Units 4 – 7 or the wet FGD system, the wet FGD system may be bypassed as necessary to prevent contaminants due to incomplete combustion from entering the scrubber and/or being entrained in the gypsum. Such periods of bypass are estimated to be less than 96 hours per year per unit.
  - b. The wet FGD system may be bypassed to perform scrubber maintenance and/or repair. Periods of bypass due to scrubber maintenance and repair are estimated to be less than 360 hours per year.

Periods of bypass operations shall be documented as specified in Condition 14, below.

[Application No. 0330045-015-AC; Design; Rules 62-4.070, F.A.C.]

### **CONTINUOUS MONITORING REQUIREMENTS**

12. Continuous Monitoring: Existing Units 4 - 7 are subject to the federal Acid Rain monitoring requirements

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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### A. Wet FGD System for Units 4 – 7

for opacity, stack gas flow rates, and emissions of CO<sub>2</sub>, NO<sub>x</sub> and SO<sub>2</sub>. The permittee shall install, calibrate, operate and maintain continuous emissions monitoring systems in the new common stack to monitor and record the stack gas flow rate and emissions of CO<sub>2</sub>, NO<sub>x</sub> and SO<sub>2</sub>. The new equipment shall be certified within 60 days of startup of the new wet FGD system. If the existing COMS located in the ductwork of each unit are able to record opacity during periods of normal and bypass operation, the existing COMS may be retained; otherwise, a new COMS shall be installed in the common scrubber stack. Unless or until an alternate sampling procedure is approved by the Department, the existing monitoring systems shall be maintained and used to demonstrate compliance with all existing emissions standards when operating in the bypass mode. [Application No. 0330045-015-AC; Design; Rules 62-4.070, F.A.C. & 62-214, F.A.C.]

### RECORDS AND REPORTS

13. Project Schedule: This construction project is scheduled to be completed and operation of the new wet FGD system commenced by December 31, 2009. The permittee shall update the Department of any change to this schedule. In addition, the permittee shall notify the Department upon completion of construction of the wet FGD system. [Application No. 0330045-015-AC; Design; Rule 62-4.070, F.A.C.]
14. Scrubber Bypass: For each period of scrubber bypass due to planned maintenance or repair, the permittee shall notify the Compliance Authority in advance by email, fax, or phone with the following information: the purpose of the wet FGD bypass, the expected dates of wet FGD bypass, and the expected duration of wet FGD bypass. During all such bypass periods, each unit shall continue to comply with the current permit standards and conditions related to excess emissions. No advance notice is required for scrubber bypass due to startup or shutdown of any of Units 4 - 7; however, the permittee shall record and maintain on-site records of all scrubber bypasses. [Rule 62-4.070(3), F.A.C.]

**SECTION 4. APPENDICES**  
**CONTENTS**

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Appendix CF. Citation Format  
Appendix GC. General Conditions  
Appendix SC. Standard Conditions

**SECTION 4. APPENDIX CF**  
**CITATION FORMATS**

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*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

**SECTION 4. APPENDIX GC**  
**GENERAL CONDITIONS**

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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**

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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 SC**  
**STANDARD CONDITIONS**

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*{Permitting Note: 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. **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.]
3. **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.]
4. **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.]
5. **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.]
6. **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.]
7. **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**

8. **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.]
9. **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 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

**SECTION 4. APPENDIX SC**  
**STANDARD CONDITIONS**

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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.]

10. 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.]
11. 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.]

12. 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.]

13. 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.
14. 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.]
15. 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.]
16. 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:
- 1. The type, location, and designation of the emissions unit tested.
  - 2. The facility at which the emissions unit is located.

**SECTION 4. APPENDIX SC**  
**STANDARD CONDITIONS**

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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**

17. **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.]
18. **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.]

**Adams, Patty**

---

**From:** Harvey, Mary  
**Sent:** Wednesday, May 02, 2007 3:23 PM  
**To:** 'Ms. Penny M. Manuel, Gulf Power Company'; 'Mr. G. Dwain Waters, Gulf Power Company'; 'Mr. Tom Davis, ECT'; Bradburn, Rick; 'Mr. Gregg Worley, EPA Region 4'  
**Cc:** Adams, Patty; Holtom, Jonathan; Gibson, Victoria  
**Subject:** Gulf Power Company - Facility #0330045-015-AC-FINAL  
**Attachments:** 0330045-015-AC - FINAL - Appendix.PDF; 0330045-015-AC Final Permit.PDF; FINLDET 0330045-015-AC-FINAL.PDF; FinInotc 0330045-015-AC - FINAL.PDF; Signed Documents - Gulf Power Co. - Facility ID #0330045-015-AC-FINAL.pdf

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

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

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Thank you,

DEP, Bureau of Air Regulation

5/4/2007

**Adams, Patty**

---

**From:** Waters, G. Dwain [GDWATERS@southernco.com]  
**Sent:** Wednesday, May 02, 2007 4:32 PM  
**To:** Harvey, Mary; Manuel, Penny Morris; Mr. Tom Davis, ECT; Bradburn, Rick; Mr. Gregg Worley, EPA Region 4  
**Cc:** Adams, Patty; Holtom, Jonathan; Gibson, Victoria  
**Subject:** RE: Gulf Power Company - Facility #0330045-015-AC-FINAL

Gulf Power has received the final Crist FGD Construction Permit. Thanks for the quick response to our permitting request. Dwain

G. Dwain Waters, Q.E.P.  
Special Projects and Environmental Assets Coordinator  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0328  
Phone: (850) 444-6527  
Cell: (850) 336-6527  
Fax: (850) 444-6217  
gdwaters@southernco.com

---

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Wednesday, May 02, 2007 2:23 PM  
**To:** Manuel, Penny Morris; Waters, G. Dwain; Mr. Tom Davis, ECT; Bradburn, Rick; Mr. Gregg Worley, EPA Region 4  
**Cc:** Adams, Patty; Holtom, Jonathan; Gibson, Victoria  
**Subject:** Gulf Power Company - Facility #0330045-015-AC-FINAL

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Thank you,

DEP, Bureau of Air Regulation

5/4/2007

**Adams, Patty**

---

**From:** Harvey, Mary  
**Sent:** Thursday, May 03, 2007 9:05 AM  
**To:** Adams, Patty; Holtom, Jonathan  
**Subject:** FW: Gulf Power Company - Facility #0330045-015-AC-FINAL

---

**From:** Waters, G. Dwain [mailto:GDWATERS@southernco.com]  
**Sent:** Wednesday, May 02, 2007 4:32 PM  
**To:** Harvey, Mary; Manuel, Penny Morris; Mr. Tom Davis, ECT; Bradburn, Rick; Mr. Gregg Worley, EPA Region 4  
**Cc:** Adams, Patty; Holtom, Jonathan; Gibson, Victoria  
**Subject:** RE: Gulf Power Company - Facility #0330045-015-AC-FINAL

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G. Dwain Waters, Q.E.P.  
Special Projects and Environmental Assets Coordinator  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0328  
Phone: (850) 444-6527  
Cell: (850) 336-6527  
Fax: (850) 444-6217  
gdwaters@southernco.com

---

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Wednesday, May 02, 2007 2:23 PM  
**To:** Manuel, Penny Morris; Waters, G. Dwain; Mr. Tom Davis, ECT; Bradburn, Rick; Mr. Gregg Worley, EPA Region 4  
**Cc:** Adams, Patty; Holtom, Jonathan; Gibson, Victoria  
**Subject:** Gulf Power Company - Facility #0330045-015-AC-FINAL

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5/4/2007

community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation



**Adams, Patty**

---

**From:** Harvey, Mary  
**Sent:** Thursday, May 03, 2007 9:05 AM  
**To:** Adams, Patty; Holtom, Jonathan  
**Subject:** FW: Gulf Power Company - Facility #0330045-015-AC-FINAL

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**From:** Manuel, Penny Morris [mailto:PMManuel@southernco.com]  
**Sent:** Wednesday, May 02, 2007 4:25 PM  
**To:** Harvey, Mary  
**Cc:** Waters, G. Dwain; Vick, James O.  
**Subject:** RE: Gulf Power Company - Facility #0330045-015-AC-FINAL

I have received this document.

---

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Wednesday, May 02, 2007 2:23 PM  
**To:** Manuel, Penny Morris; Waters, G. Dwain; Mr. Tom Davis, ECT; Bradburn, Rick; Mr. Gregg Worley, EPA Region 4  
**Cc:** Adams, Patty; Holtom, Jonathan; Gibson, Victoria  
**Subject:** Gulf Power Company - Facility #0330045-015-AC-FINAL

Dear Sir/Madam:

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

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Thank you,

DEP, Bureau of Air Regulation

**Adams, Patty**

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**From:** Harvey, Mary  
**Sent:** Thursday, May 03, 2007 9:06 AM  
**To:** Adams, Patty  
**Subject:** FW: Gulf Power Company - Facility #0330045-015-AC-FINAL

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**From:** Tom Davis [mailto:tdavis@ectinc.com]  
**Sent:** Wednesday, May 02, 2007 4:22 PM  
**To:** Harvey, Mary  
**Subject:** RE: Gulf Power Company - Facility #0330045-015-AC-FINAL

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**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Wednesday, May 02, 2007 3:23 PM  
**To:** Ms. Penny M. Manuel, Gulf Power Company; Mr. G. Dwain Waters, Gulf Power Company; Mr. Tom Davis, ECT; Bradburn, Rick; Mr. Gregg Worley, EPA Region 4  
**Cc:** Adams, Patty; Holtom, Jonathan; Gibson, Victoria  
**Subject:** Gulf Power Company - Facility #0330045-015-AC-FINAL

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Thank you,

DEP, Bureau of Air Regulation

5/4/2007

## Adams, Patty

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**From:** Harvey, Mary  
**Sent:** Thursday, May 03, 2007 9:06 AM  
**To:** Adams, Patty  
**Subject:** FW: Gulf Power Company - Facility #0330045-015-AC-FINAL

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**From:** Manuel, Penny Morris [<mailto:PManuel@southernco.com>]  
**Sent:** Wednesday, May 02, 2007 3:35 PM  
**To:** Harvey, Mary  
**Subject:** Read: Gulf Power Company - Facility #0330045-015-AC-FINAL

Your message

**To:** [PManuel@southernco.com](mailto:PManuel@southernco.com)  
**Subject:**

was read on 5/2/2007 3:35 PM.