

Friday, Barbara

From: Forney.Kathleen@epamail.epa.gov

Sent: Tuesday, August 14, 2007 10:19 AM

To: Friday, Barbara

Cc: Little.James@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov

Subject: Re: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

We received this permit... Thanks

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130

Fax: 404-562-9019

8/14/2007

Friday, Barbara

To: gdwaters@southernco.com; 'tdavis@ectinc.com'; Bradburn, Rick; little.james@epa.gov; forney.kathleen@epa.gov
Cc: Holtom, Jonathan
Subject: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant
Attachments: FinlNotc0330045-018-AC.pdf; 0330045-018-AC Appendix.pdf; 0330045-018-AC Final Permit.pdf; FinalACPermitSignaturePage.pdf; FINLDET 0330045-018-AC-F.pdf

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).

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

8/13/2007

Friday, Barbara

From: System Administrator
To: Bradburn, Rick
Sent: Monday, August 13, 2007 2:39 PM
Subject: Delivered:FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

Your message

To: 'gdwaters@southernco.com'; 'tdavis@ectinc.com'; Bradburn, Rick; 'little.james@epa.gov'; 'forney.kathleen@epa.gov'
Cc: Holtom, Jonathan
Subject: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant
Sent: 8/13/2007 2:39 PM

was delivered to the following recipient(s):

Bradburn, Rick on 8/13/2007 2:39 PM

Friday, Barbara

From: Exchange Administrator
Sent: Monday, August 13, 2007 2:39 PM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)

Attachments: ATT141524.txt; FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant



ATT141524.txt
(284 B)

FINAL AC Permit
No.: 0330045-0...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

tdavis@ectinc.com

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]
Sent: Monday, August 13, 2007 2:38 PM
To: Friday, Barbara
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(692 B)



Message
Headers.txt (2 KB)

This is the mail system at host mseive02.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<forney.kathleen@epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK,
sent 46C0A4F8_13628_26679_6

<little.james@epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent
46C0A4F8_13628_26679_6

Friday, Barbara

From: Tom Davis [tdavis@ectinc.com]
Sent: Monday, August 13, 2007 2:41 PM
To: Friday, Barbara
Subject: RE: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Monday, August 13, 2007 2:39 PM
To: gdwaters@southernco.com; tdavis@ectinc.com; Bradburn, Rick; little.james@epa.gov; forney.kathleen@epa.gov
Cc: Holtom, Jonathan
Subject: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

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Thank you,

DEP, Bureau of Air Regulation

8/13/2007

Friday, Barbara

From: Bradburn, Rick
To: Friday, Barbara
Sent: Monday, August 13, 2007 2:45 PM
Subject: Read: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

Your message

To: 'gdwaters@southernco.com'; 'tdavis@ectinc.com'; Bradburn, Rick; 'little.james@epa.gov'; 'forney.kathleen@epa.gov'
Cc: Holtom, Jonathan
Subject: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant
Sent: 8/13/2007 2:39 PM

was read on 8/13/2007 2:45 PM.

Friday, Barbara

From: Mailer-Daemon@ectinc.com
Sent: Monday, August 13, 2007 2:48 PM
To: Friday, Barbara
Subject: Confirm: 'FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant' received

A message which requested delivery confirmation recently arrived at this server. This server honors all delivery confirmation requests whether generated from local mail traffic or from mail received via an outside source (such as SMTP/POP).

Message-ID: <1900D374FE4CCB4AB8DEB001320338BABA7E06@tlhexsmb5.floridadep.net>
To : tdavis@ectinc.com
From : Barbara.Friday@dep.state.fl.us
Subject : FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy
Generating Plant
Date : Mon, 13 Aug 2007 14:38:40 -0400

Receiving Domain: ectinc.com

Friday, Barbara

From: Waters, G. Dwain [GDWATERS@southernco.com]
Sent: Monday, August 13, 2007 2:56 PM
To: Friday, Barbara; TDAVIS@ECTINC.COM; Bradburn, Rick; little.james@epa.gov; forney.kathleen@epa.gov
Cc: Holtom, Jonathan
Subject: Re: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

Gulf Power has received the permit. Thanks, Dwain

Dwain Waters, QEP

-----Original Message-----

From: Friday, Barbara <Barbara.Friday@dep.state.fl.us>
To: Waters, G. Dwain; tdavis@ectinc.com <tdavis@ectinc.com>; Bradburn, Rick <Rick.Bradburn@dep.state.fl.us>; little.james@epa.gov <little.james@epa.gov>; forney.kathleen@epa.gov <forney.kathleen@epa.gov>
CC: Holtom, Jonathan <Jonathan.Holtom@dep.state.fl.us>
Sent: Mon Aug 13 13:38:40 2007
Subject: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

Dear Sir/Madam:

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<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,

DEP, Bureau of Air Regulation

Friday, Barbara

From: Waters, G. Dwain [GDWATERS@southernco.com]
To: Friday, Barbara
Sent: Monday, August 13, 2007 2:56 PM
Subject: Read: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

Your message

To: GDWATERS@southernco.com
Subject:

was read on 8/13/2007 2:56 PM.

Friday, Barbara

From: Terry, Greg N. [GNTERRY@southernco.com]
To: undisclosed-recipients
Sent: Monday, August 13, 2007 5:05 PM
Subject: Read: FINAL Title V Permit Revision No.: 0330045-016-AV - Gulf Power Company - Crist Electric Generating Plant

Your message

To: GNTERRY@southernco.com
Subject:

was read on 8/13/2007 5:05 PM.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Mr. G. Dwain Waters, Q.E.P.
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Air Permit No. 0330045-018-AC
Crist Electric Generating Plant
Escambia County

Enclosed is Final Permit Number 0330045-018-AC. This permit authorizes the rebuild of the electrostatic precipitators (ESP) for units 4 and 5 at the existing Crist Generating Station. 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 8/13/07 to the persons listed:

Mr. G. Dwain Waters, Gulf Power Company (gdwaters@southernco.com)

Mr. Tom Davis, ECT (tdavis@ectinc.com)

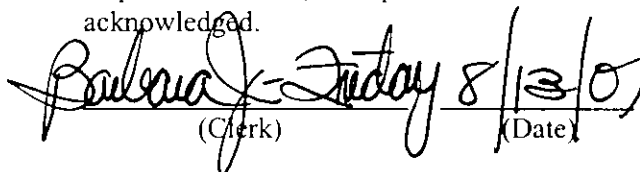
Mr. Rick Bradburn, NWD (rick.bradburn@dep.state.fl.us)

Mr. Jim Little, EPA Region 4 (little.james@epa.gov)

Ms Katy Forney, EPA Region 4 (forney.kathleen@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) 8/13/07 (Date)

FINAL DETERMINATION

Gulf Power Company
Crist Electric Generating Plant
Air Permit No. 0330045-018-AC

The Department distributed a public notice package on July 24, 2007, to authorize the rebuilding of the hot-side electrostatic precipitators for units 4 and 5 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 July 27, 2007.

COMMENTS/CHANGES

No comments were received from the public during the 14-day public comment period; however, minor comments were received from the applicant and the permit was changed as shown below. Deletions are indicated by a ~~strike through~~ and additions are indicated by a double underline.

Comment 1. Section 3. Emissions Unit Specific Condition # 4, Project Schedule; Page 5 of 6. The item references specific schedules for Unit 4 and 5. It should be noted that these dates are tentative and are subject to be revised based on unit, plant and system operating needs and conditions. In addition, Gulf believes that specific outage schedules should not be noted in a public document which may allow a "competitive advantage" to players in the energy market. This statement is based upon recent rulings by FERC regarding "Separation Protocol".

Response 1. The Department understands the applicant's concerns and has changed condition 4 as follows:

4. Project Schedule: Unit 5 is scheduled for the ESP maintenance and upgrade during ~~September~~, 2007. Unit 4 is scheduled for the ESP maintenance and upgrade during ~~January~~, 2008. [Applicant Request]

Comment 2. Section 4. Appendix SC, Standard Conditions: For clarification purposes, it should be noted that Plant Crist has several items which meet the qualifying standard condition statement: "Unless otherwise specified by the permit or rule, the following conditions apply to all emissions units and activities at this facility."

- Item 3. Excess Emissions Allowed: Condition does not apply to Plant Crist for startup and shutdown for 2 hours in any 24 hour period.
- Item 7. General Visible Rule of 20% opacity does not apply to many of the Crist generating units.

Response 2. Appendix SC contains standard conditions that generally apply to all construction permitting projects. The items in the Title V permit that fall under the "Unless otherwise specified by the permit or rule..." language are not in any way affected by this construction permit. Your comment is noted, but no changes are required to this permit.

CONCLUSION

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



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:

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

Crist Electric Generating Plant
Units 4 & 5 ESP Rebuild Project
Facility ID No. 0330045
SIC No. 4911

Air Permit No. 0330045-018-AC
Permit Expires: December 31, 2009

PROJECT AND LOCATION

This permit authorizes the construction/rebuild of the hot-side electrostatic precipitators (ESP) for Units 4 and 5 at the existing Crist Electric Generating Station, which is located on Governors Bayou off of 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, 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 rebuild 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)

SECTION 1. GENERAL INFORMATION

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 fuels in all four of the units.

The following units are affected by this air construction permit.

ID	Emission Unit Description
004	Boiler No. 4 (Phase I and II Acid Rain Unit)
005	Boiler No. 5 (Phase I and II Acid Rain Unit)

The project addressed by this permitting action is the rebuild of the hot-side electrostatic precipitators (ESP) for Units 4 and 5.

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.

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

RELEVANT DOCUMENTS

The permit application and any additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.

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 (Department) 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 32502-5794.
3. Appendices: The following Appendices are attached as part of this permit: Appendix CF (Citation Format); Appendix GC (General Conditions); 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, 62-296, 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, 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/rebuild 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. Due to the minor nature of the Title V permit revisions that will be required following the changes authorized by this permit, a requested revision to accurately describe the rebuilt ESP shall be included with the next application for Title V permit (revision or renewal). [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 004 & 005

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

ID	Emission Unit Description
004	Boiler No. 4 (Phase I and II Acid Rain Unit)
005	Boiler No. 5 (Phase I and II Acid Rain Unit)
<p><i>Description:</i> Unit 4 is a Combustion Engineering tangentially fired, dry bottom boiler that began commercial operation on July 1, 1959. Unit 5 is a Combustion Engineering tangentially fired, dry bottom boiler that began commercial operation on June 1, 1961.</p> <p><i>Fuels:</i> Coal, natural gas, new No. 2 fuel oil and/or on-specification used oil, biomass, and occasional on-site generated "oil contaminated soil".</p> <p><i>Capacity:</i> Each unit is rated for 1,096.7 million British thermal units per hour (MMBtu/hour) when firing pulverized coal, natural gas, No. 2 fuel oil, or on-specification used oil; and, 40.2 MMBtu/hr when firing biomass.</p> <p><i>Particulate Matter (PM) Controls:</i> Hot-side and cold-side electrostatic precipitators (ESP).</p> <p><i>Nitrogen Oxide (NO_x) Controls:</i> Low NO_x burners and selective non-catalytic reduction (SNCR).</p> <p><i>Continuous Monitors:</i> Carbon dioxide (CO₂), NO_x, sulfur dioxide (SO₂), opacity, stack gas flow, and urea injection rate.</p> <p><i>Stack Parameters:</i> Units 4 shares a common stack with Unit 5 that is 450 feet tall with a diameter of 18.0 feet. The volumetric flow rate of Unit 4 & 5 combined, at permitted capacity, is approximately 596,012 acfm.</p> <p><i>{Permitting Notes: 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); predate the requirements of Rule 62-212.400, F.A.C. (PSD Preconstruction Review); and are regulated under Phase I and Phase II of the federal Acid Rain Program (40 CFR 75).}</i></p>	

PREVIOUS APPLICABLE REQUIREMENTS

1. 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.]

EQUIPMENT AND CONSTRUCTION

2. Hot-side Electrostatic Precipitators: The permittee is authorized to rebuild the hot-side ESP on Units 4 and 5. Each unit is currently composed of a two-chamber single casing with three (3), 9-foot mechanical fields consisting of a Buell "BA" design with weighted wire discharge electrodes. In general, the rebuild will consist of the following work. The internals of the Unit 4 and 5 casings will be rebuilt in Buell "BA" configuration with GE ENERGY ESP-3 collecting plates and RDE-1 rigid discharge electrodes. New switch mode power supply (SMPS) units will be installed for each casing. The existing rappers and vibrators will be replaced with GE ENERGY electromagnetic impact rappers. The existing casing, hoppers, box beams, and collecting plate support frame pivot points will be reused. GE ENERGY will also supply new insulator compartments and mini penthouses, as well as hopper doors for both units. New hot roof panels and new internal water wash systems will also be installed. The roof panels are designed to fit within the existing box beams and will be pre-punched for the roof penetrations. [Design; Applicant Request.]
3. Updated Designs: The permittee shall update the Department with final design specifications and any

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Emissions Units 004 & 005

substantial changes made to the final design specifications during the actual construction phase. [Rule 62-4.070(3), F.A.C.]

4. Project Schedule: Unit 5 is scheduled for the ESP maintenance and upgrade during 2007. Unit 4 is scheduled for the ESP maintenance and upgrade during 2008. [Applicant Request]

PERFORMANCE REQUIREMENTS

{Permitting Note: This permit does not alter any specifications or limitations included in previous permits that define permitted capacities such as heat input rates, fuel consumption, or hours of operation. It does not authorize any additional fuels or such other methods of operation.}

EMISSIONS STANDARDS

{Permitting Note: All existing emissions limits remain in effect.}

EMISSIONS PERFORMANCE TESTING

5. 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.]
6. Particulate Matter (PM) Compliance Tests: Within 60 days after completing the rebuild of the ESP and bringing Units 4 and 5 back on line, the permittee shall conduct tests to demonstrate compliance with the PM limits. Test data shall be collected for at least three one-hour test runs. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

RECORDS AND REPORTS

7. 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) and the PM emission rate (lb/MMBtu). The report shall also include copies of the continuous opacity monitoring results recorded during the tests and a statement that a revised ESP description will be provided with the next application for Title V permit (revision or renewal). [Rule 62-297.310(8) & 62-213.440, F.A.C.]

SECTION 4. APPENDICES)

Appendix CF - Citation Format;
Appendix GC - General Conditions; 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

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 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(3), F.A.C.]

Florida Department of
Environmental Protection

Memorandum

TO: Joseph Kahn

THRU: Trina Vielhauer
Jeff Koerner *JK*

FROM: Jonathan Holtom *J.H.*

DATE: August 10, 2007

SUBJECT: Project No. 0330045-018-AC
Final Construction Permit For Gulf Power Crist
Rebuild of Units 4 and 5 Electrostatic Precipitators (ESP)

Attached for your approval and signature is a final construction permit for Gulf Power's Crist Electric Generating Plant. This permit authorizes the rebuild of the ESP for units 4 and 5.

The Public Notice requirements were met on July 27 by publishing in the Pensacola News Journal. No comments were received from the public, but minor comments were received from the applicant, in response to this Public Notice. No petitions were filed for an Administrative Hearing.

I recommend your approval and signature.

Attachments

TLV/jk/jh