



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

April 10, 2001

CERTIFIED MAIL – Return Receipt Requested

Mr. Robert G. Moore
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

*Treat as a
final permit*

Dear Mr. Moore:

RE: Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's Electrostatic Precipitator (ESP)

The Department has reviewed the request that you provided on March 8, 2001. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Crist Electrical Generating Plant's Unit #7's ESP (electrostatic precipitator) located in Pensacola, Escambia County. The purpose is to help the company address Compliance Assurance Monitoring (CAM), which will have to be addressed regarding the ESP upon renewal of their Title V Operation Permit. Paragraph 403.061(16), Florida Statutes (F.S.), authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide reasonable and practical regulatory controls consistent with public interest.

In accordance with the provisions of Paragraphs 403.061(16) and (18), F.S., and Rule 62-210.700(5), F.A.C., you are hereby authorized to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's ESP. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions and opacity standards. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit #7's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, visible emissions, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load,

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Mr. Robert G. Moore
Gulf Power Company
Crist Electric Generating Plant: Unit #7
Page Two

fuel flow, excess air and flue gas temperature, and other unit specific parameters that are needed for the computer model.

The performance tests and parameter measurements or monitoring shall be subject to the following conditions:

1. Unless waived, the permittee shall notify the Department's Northwest District office and the Bureau of Air Regulation at least 15 days prior to commencement of the performance tests and parameter measurements or monitoring. A written report shall be submitted to these offices within 45 days upon completion of the last test run and parameter measurements and monitoring.
2. The authorized testing and measurement and monitoring schedule is from April 14 to May 4, 2001. If additional time is needed, the permittee shall provide the Department with documentation of the progress accomplished to date and shall identify what is left to be done to complete the testing and measurements or monitoring.
3. The parameters to be measured or monitored are sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), carbon dioxide (CEM), particulate size distribution, ash content of the fuel, ultimate fuel analyses, load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model.
4. Emissions testing shall be conducted for the following pollutants and using the following test methods:
 - a. Particulate matter EPA Test Method 17 (including EPA Test Methods 1 thru 4)
 - b. Visible emissions EPA Test Method 9
5. The release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C., is not authorized for this activity.
6. Performance testing shall immediately cease upon the occurrence of a valid environmental complaint by a citizen or other party, or a nuisance or danger to the public health or welfare. Performance testing shall not resume until appropriate measures to correct the problem have been implemented.
7. The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida.
8. This Department action is just to authorize the performance testing and parameter measurements and monitoring for the Crist Unit #7's ESP for the purpose of developing a CAM protocol.
9. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
10. The Department shall be notified in writing on the date of the last test run and parameter measurement and monitoring completion. If after work hours, notification shall occur on the next work day.

Mr. Robert G. Moore
Gulf Power Company
Crist Electric Generating Plant: Unit #7
Page Three

11. Attachment Section.

- a. Mr. G. Dwain Waters's letter received March 8, 2001.
- b. Final Determination.

The Department has relied on the information referenced in the Attachment Section and conversations with representatives of Gulf Power Company in authorizing this activity.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources Management

HLR/rbm

Enclosures

cc: Clair Fancy, DEP - BAR
Scott Sheplak, DEP - BAR
Sandra Veazey, DEP - NWD
Andy Allen, DEP - NWD
Joe Kahn, DEP - BAMMS
G. Dwain Waters, Q.E.P., GPC

FINAL DETERMINATION

Gulf Power Company

Project No.: 0330045-002-AC

I. Public Notice and Comments.

The Public Notice of the permitting project was published in the Pensacola News Journal on March 20, 2001. There were no written comments received in the commenting period (14-days), which concluded at the close of business of April 2nd. However, on March 19th, Mr. Dwain Waters, with Gulf Power Company, phoned Mr. Bruce Mitchell and provided the following comments on the draft authorization letter:

1. On the 1st page, 2nd paragraph, 6th line, insert "and opacity" after "...particulate matter emissions" and make "standard" plural; and, it will read as:

.....particulate matter emissions and opacity standards.

2. On the 2nd page, condition No. 1 requires a notification of 15 days, which would conflict with the proposed date of April 16th. Therefore, "Unless waived," will be placed at the beginning of the condition as follows:

1. Unless waived, the permittee shall notify.....

3. On the 2nd page, condition No. 10, add a statement to the end on the condition to cover a situation where the testing ends after business hours. Therefore, the following sentence will be added to the end of the condition:

If after work hours, notification shall occur on the next work day.

II. Conclusion.

The changes requested were acceptable and did not significantly change the permitting action. Therefore, it is recommended to issue the authorization letter with the above changes made.

Florida Department of
Environmental Protection

Memorandum

Bruce

TO: Howard Rhodes

THRU: Clair Fancy

FROM: Bruce Mitchell

DATE: April 10, 2001

SUBJECT: Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's Electrostatic Precipitator (ESP)

The proposed project was Public Noticed in the Pensacola News Journal on March 20, 2001. No comments were received during the commenting period (14-days), which ended April 2, 2001.

It is recommended that the letter be signed.

HLR/rbm

Attachment

Fax #: 850/444-6217



Florida
Department of
Environmental Protection

Jeb Bush
Governor

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

David Struhs
Secretary

F A X T R A N S M I T T A L S H E E T

DATE: 4-12-2001

TO: Gov. D wain Waters

PHONE: 850/444-6527

FAX: 850/444-6217

FROM: Bruce Mitchell

PHONE: 850/921-9506

Division of Air Resources Management

FAX: 850.922.6979

RE: CAM Protocol; Plant Crist

CC: _____

Total number of pages including cover sheet: 5

Message

Hard copy to follow. Please give me a call if
there is any problems in transmitting /readability.

Thanks,

Bruce Mitchell

If there are any problems with this fax transmittal, please call the above phone number.

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Florida Department of Environmental Protection

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

David Struhs
Secretary

F A X T R A N S M I T T A L S H E E T

DATE: 4-12-2001

TO: Ms. Sandra Veazey

SB/695-8096

PHONE: SC/695-8364

FAX: SC/695-8417

FROM: Bruce Mitchell

PHONE: SC/291-9506

Division of Air Resources Management

FAX: 850.922.6979

RE: Gulf Power Crist Plant: CAM testing

CC: _____

4-12-01
down
11:45

Total number of pages including cover sheet: 5

Message

Please advise is unreadable.

Junta,

Bruce Mitchell

4-12-01 @ 12:30 pkg did not go through. Mary Beth Curke
e-mailed the pkg + sent signature page by fax

If there are any problems with this fax transmittal, please call the above phone number.

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Mr. Robert G. Moore
 V.P. of Power Generation/Transmission
 Gulf Power Company
 One Energy Place
 Pensacola, Florida 32520-0328

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) RG Moore B. Date of Delivery 7/16/00

C. Signature X RG Moore Agent Addressee

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

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 Registered Return Receipt for Merchandise
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4. Restricted Delivery? (Extra Fee) Yes

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Total Postage & Fees	\$	

Name (Please Print Clearly) (to be completed by mailer)
Robert G. Moore, V.P. of Power Generation/Transmission
 Street, Apt. No. or PO Box No.
Gulf Power Company - One Energy Place
 City, State, ZIP+4
Pensacola Fla 32520-0328

PS Form 3800, July 1999 See Reverse for Instructions