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Pensacola, Florida 32520

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Certified Mail

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BUREAU OF AIR REGULATION

March 1, 2001

R. Bruce Mitchell
Title V Section – Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

RE: CRIST ELECTRIC GENERATING PLANT
AUTHORIZATION TO CONDUCT CAM PROTOCOL TESTING
PERMIT No: 0330045-001-AV

Thanks again for meeting with me in January and sending examples of similar permitting activities to help Gulf Power properly coordinate our proposed testing of the Crist Unit 7 electrostatic precipitator (ESP) for development of a Compliance Assurance Monitoring (CAM) protocol. As you are aware, CAM is a requirement that must be addressed in the next round of Title V permit renewals for all facilities having pollution control equipment. In order to meet this goal, Gulf Power is planning a series of special particulate emission tests to calibrate a EPRI (Electric Power Research Institute) computer model to evaluate the performance of the Crist Unit 7 ESP. Simply stated, this evaluation will require Gulf Power to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate emissions standard.

Therefore, Gulf Power requests a permit amendment to allow the CAM protocol developmental testing on Crist Unit 7 from April 9 through May 4, 2001 as needed to complete all tests and measurements. Authorization of these tests is consistent with the Department's power and duty under Section 403.061(18), Florida Statutes, to "[e]ncourage and conduct studies, investigations, and research relating to pollution and its causes, effects, prevention, abatement, and control."

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The specific equipment to be tested is the Crist Unit 7 electrostatic precipitator. The pollutants and or parameters measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature and other unit specific parameters that are needed for the computer model. Test methods to be utilized include EPA Method 9, EPA Method 17, CEM monitoring data (SO₂, NO_x, CO₂), and particulate size distribution.

Attached is an authorization statement by Robert G. Moore, the Responsible Official outlining his approval of this permit amendment request. Also attached is a statement by a professional engineer regarding the certification of the test protocol and schedule. Please note that we recently met with Andy Allen and the permitting staff at the Northwest Florida District office to outline this request, our test schedule and the basic CAM procedure. Ms. Sandra Veazey and her staff are being copied on this correspondence.

If you have any questions or need further information regarding the test procedures or CAM protocol development for Crist Unit 7, please call me at (850) 444.6527.

Sincerely,



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

cc: w/att: Jim. Vick, Gulf Power Company
Joe Martin, Gulf Power Company
John Dominey, Gulf Power Company
Kevin Beaty, Gulf Power Company
Greg Terry, Gulf Power Company
Danny Herrin, Southern Company Services
Mark Berry, Southern Company Services
Gary Perko, HGSS

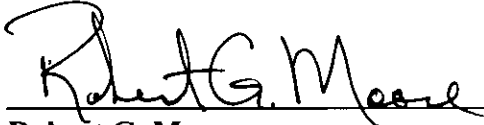
Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida

Mr. Andy Allen, FDEP Northwest District Office, Pensacola, Florida

**CERTIFICATION BY RESPONSIBLE OFFICIAL
CRIST UNIT 7 COMPLIANCE ASSURANCE MONITORING
TEST PERMIT AMENDMENT REQUEST**

“I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Crist Electric Generating Plant for which this permit amendment is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this request are true, accurate and complete.”

Responsible Official Signature:



Robert G. Moore
Vice-President of Power Generation/Transmission

3/2/01
Date:

**CRIST UNIT 7 COMPLIANCE ASSURANCE MONITORING
TEST PROTOCOL AND SCHEDULE
CERTIFICATION BY PROFESSIONAL ENGINEER**

“I, the undersigned, am a registered professional engineer in the state of Florida and hereby certify to the best of my knowledge that all information submitted for this permit amendment to conduct special emissions testing for compliance assurance monitoring at the Crist Electric Generating Plant is true, accurate and complete.”

Professional Engineer Signature:



Gregory N. Terry
Registration Number: 52786

3-5-01
Date