



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

November 5, 2008

Mr. Theodore J. McCullough, V.P. of Power Generation
Gulf Power Company
One Energy Place
Pensacola, Florida 32520

Re: Draft Air Construction Permit No. 0330045-023-AC
(Revises Original Permit No. 0330045-015-AC)
Gulf Power Company, Crist Electrical Generating Plant
Revised Wet Flue Gas Desulfurization (FGD) Project
New Sulfur Dioxide (SO₂) Emissions Standard

Dear Mr. McCullough:

On October 8, 2008, you submitted an application requesting a new SO₂ emissions standard. This facility is located in Escambia County on Governors Bayou off 10 Mile Road in Pensacola, Florida. Enclosed are the following documents: Technical Evaluation and Preliminary Determination; Draft Permit and Appendices; Written Notice of Intent to Issue Air Permit; and Public Notice of Intent to Issue Air Permit. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the Project Engineer, Jeff Koerner, at 850/921-9536.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

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

Authorized Representative:

Mr. Theodore J. McCullough, V.P. of Power Generation

Air Permit No. 0330045-023-AC
Crist Electric Generating Plant
Existing Coal-Fired Units 4 - 7
Revised Wet FGD Project
New SO₂ Emissions Standard

Facility Location: Gulf Power Company operates the existing Crist Electric Generating Plant, which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida.

Project: This permit revision establishes a new sulfur dioxide (SO₂) emissions standard based on the final design and capabilities of the equipment. It revises original Permit No. 0330045-015-AC, which authorized construction of the wet flue gas desulfurization (FGD) project. Actual annual SO₂ emissions will be reduced as a result of this project. The project is not to subject to the preconstruction review requirements of Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact

Gulf Power Company
Crist Electrical Generating Plant

Draft Air Permit No. 0330045-023-AC
Wet FGD Project, New SO₂ Standard

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.

FO5


Trina Vielhauer, Chief
Bureau of Air Regulation

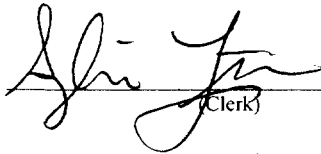
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that either this Written Notice of Intent to Issue Air Permit (including the Draft Permit, Appendices, Public Notice and Technical Evaluation and Preliminary Determination), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested to the persons listed below.

- Mr. Theodore J. McCullough, Gulf Power (tjmccull@southernco.com)
- Mr. G. Dwain Waters, Gulf Power Company (gdwaters@southernco.com)
- Mr. Tom Davis, ECT (tdavis@ectinc.com)
- Mr. Rick Bradburn, NWD Office (rick.bradburn@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epamail.epa.gov)
- Ms. Victoria Gibson, BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp


FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.


Clerk

11/6/08
Date

Florida Department of
Environmental Protection

Memorandum

To: Trina Vielhauer, Bureau of Air Regulation
From: Jeff Koerner, New Source Review Section 
Date: November 5, 2008
Subject: Draft Air Permit No. 0330045-023-AC
Gulf Power Company, Crist Electrical Generating Plant
Revisions to Wet Flue Gas Desulfurization Project
New SO₂ Emissions Standard

Gulf Power Company operates the Crist Electric Generating Plant, which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida. Air Permit No. 0330045-015-AC authorized the construction of a new wet flue gas desulfurization system (FGD) for existing coal-fired Units 4 through 7 (EU-004 through EU-007) to control sulfur dioxide (SO₂) emissions. Initially, the applicant elected to install the new air pollution control equipment to provide full flexibility in implementing the federal cap and trade program for sulfur dioxides under the Clean Air Interstate Rule (CAIR). For this new project, the Department revises the original permit to establish the following new SO₂ emissions standard based on the capabilities of the final design and capabilities of the equipment. Actual annual SO₂ emissions will be reduced as a result of this project. The project is not subject to PSD preconstruction review.

I recommend your approval of the attached draft permit package.

Attachments

TLV/jfk

P.E. CERTIFICATION STATEMENT

PERMITTEE

Gulf Power Company
One Energy Place
Pensacola, Florida 32520

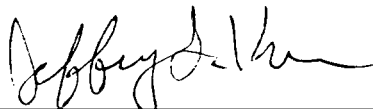
Draft Air Permit No. 0330045-023-AC
Crist Electric Generating Plant
Revised Wet Flue Gas Desulfurization Project
Existing Coal-Fired Units 4 - 7
Escambia County, Florida

PROJECT DESCRIPTION

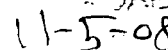
Gulf Power Company operates the Crist Electric Generating Plant, which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida. The Crist Electric Generating Plant includes four existing coal-fired Units 4 through 7. In 2007, the Department issued Permit No. 0330045-015-AC, which authorized the construction of a new wet flue gas desulfurization system (FGD) to control sulfur dioxide (SO₂) emissions. Initially, the applicant elected to install the new air pollution control equipment to provide full flexibility in implementing the federal cap and trade program for sulfur dioxides under the Clean Air Interstate Rule (CAIR).

For this new project, the Department is revising the original permit to establish the following new SO₂ emissions standard based on the final design and capabilities of the control equipment, "As determined by CEMS emissions data, SO₂ emissions from the combined operation of Units 4, 5, 6, and 7 shall not exceed 886.0 tons during any 30-day rolling total of FGD scrubber operational days." Actual annual SO₂ emissions will be reduced as a result of this project. The project is not subject to the preconstruction review requirements of Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

***I HEREBY CERTIFY** that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*



Jeffery F. Koerner, P.E.
Registration Number 49441



(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Gulf Power Company, Crist Electric Generating Plant
Draft Air Permit No. 0330045-023-AC
New Sulfur Dioxide Emissions Standard
Escambia County, Florida

Applicant: The applicant for this project is the Gulf Power Company. The applicant's authorized representative and mailing address is: Mr. Theodore J. McCullough, V.P. of Power Generation, Gulf Power Company, Crist Electric Generating Plant, One Energy Place, Pensacola, Florida 32520.

Facility Location: Gulf Power Company operates the existing Crist Electric Generating Plant, which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida.

Project: The Crist Electric Generating Plant includes four existing coal-fired Units 4 through 7. In 2007, the Department issued Permit No. 0330045-015-AC, which authorized the construction of a new wet flue gas desulfurization system (FGD) to control sulfur dioxide (SO₂) emissions. Initially, the applicant elected to install the new air pollution control equipment to provide full flexibility in implementing the federal cap and trade program for sulfur dioxides under the Clean Air Interstate Rule (CAIR).

For this new project, the Department is revising the original permit to establish the following new SO₂ emissions standard based on the final design and capabilities of the control equipment, "As determined by CEMS emissions data, SO₂ emissions from the combined operation of Units 4, 5, 6, and 7 shall not exceed 886.0 tons during any 30-day rolling total of FGD scrubber operational days." Actual annual SO₂ emissions will be reduced as a result of this project. The project is not subject to the preconstruction review requirements of Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a

(Public Notice to be Published in the Newspaper)

period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Gulf Power Company
One Energy Place
Pensacola, Florida 32520

Crist Electric Generating Plant
ARMS Facility ID No. 0330045
Escambia County, Florida

PROJECT

Project No. 0330045-023-AC
Wet Flue Gas Desulfurization Project
Existing Coal-Fired Units 4 - 7

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
New Source Review Section
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

November 5, 2008

{Filename: 0330045-023-AC - TEPD.doc}

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial activities. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Facility Description and Location

Gulf Power Company operates the Crist Electric Generating Plant, 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. This site is in an area currently in attainment with (or designated as unclassifiable for) all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS). The facility is an existing electric generating plant, which is categorized under Standard Industrial Classification Code No. 4911.

Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

Air Permit No. 0330045-015-AC authorized the construction of a new wet flue gas desulfurization system (FGD) for the existing coal-fired Units 4 – 7 (EU-004 through EU-007) to control sulfur dioxide (SO₂) emissions. Initially, the applicant elected to install the new air pollution control equipment to provide full flexibility in implementing the federal cap and trade program for sulfur dioxides under the Clean Air Interstate Rule (CAIR). For this project, the Department will establish a new SO₂ emissions standard based on the final design and capabilities of the equipment.

Processing Schedule

10/08/08 Received the application for a minor source air pollution construction permit; application complete.

2. PSD APPLICABILITY

General PSD Applicability

The Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. A PSD applicability review is required in areas currently in attainment with the state and federal AAQS or areas otherwise designated as "unclassifiable".

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit: 250 tons per year or more of any regulated air pollutant; 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD major facility categories defined in Rule 62-210.200, F.A.C. for major stationary sources; or 5 tons per year of lead. Projects at existing or new major stationary sources are subject to PSD preconstruction review. In addition, proposed projects at existing minor sources are subject to PSD preconstruction review if potential emissions *from the proposed project* will exceed the PSD major stationary source thresholds.

Once a project becomes subject to PSD preconstruction review, each PSD pollutant is reviewed for PSD applicability based on emissions thresholds known as the “significant emission rates” defined in Rule 62-210.200, F.A.C. Pollutant emissions from the project exceeding these rates are considered “significant” and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

PSD Applicability for Project

This project establishes a new SO₂ emissions standard to reflect the final design and capabilities of the previously authorized air pollution control equipment. Actual annual SO₂ emissions will be reduced as a result of this project. The project is not to subject to PSD preconstruction review.

3. PROJECT REVIEW

Air Permit No. 0330045-015-AC authorized the construction of a new wet FGD system to control SO₂ emissions from existing coal-fired 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 limestone slurry will be injected to chemically react with sulfur dioxide (SO₂) in the scrubber vessel for removal as gypsum. The wet FGD system is based on the Model No. CT-121 wet FGD process licensed by Southern Company from Chiyoda Corporation. The preliminary design is for removal of approximately 95% of the SO₂ 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.

The maximum heat input rates are: Unit 1 (1096.7 MMBtu/hour), Unit 2 (1096.7 MMBtu/hour), Unit 3 (3704.8 MMBtu/hour), and Unit 4 (6406.4 MMBtu/hour) for a total combined maximum heat input rate of 12,304.6 MMBtu/hour. The uncontrolled SO₂ emissions rate is 2.4 lb/MMBtu. Assuming a 91.7% reduction, the controlled SO₂ emissions rate will be 0.20 lb/MMBtu. Therefore, the maximum hourly emissions rate is expected to be: (12,304.6 MMBtu/hour) (0.20 lb/MMBtu) = 2460.92 lb/hour. The maximum daily emissions rate would be 59,062.08 lb/day and the maximum 30-day rolling average would be 885.9 tons/30 days.

To recognize the final design and capabilities of the wet FGD system, the applicant requests an emissions standard of 886.0 tons during any 30-day rolling total of FGD scrubber operational days with the following stipulations.

- A “FGD scrubber operational day” shall be defined as a calendar day during which one or more of the boilers operated for at least 18 hours and the FGD scrubber was operational or only being bypassed for purposes of short-term maintenance as described below.
- For normal operations, SO₂ emissions shall be determined by emissions data collected from the continuous emissions monitoring systems (CEMS). The SO₂ mass emissions rates shall be calculated in terms of “pounds per day” for each calendar day of operation by summing the hourly mass emissions rates (lb/hour) determined from the actual heat input rates (MMBtu/hour) and the monitored emissions levels (lb/MMBtu). Initially, the actual heat input rates will be determined by fuel firing rates and heating values. The permittee shall conduct a study to determine the accuracy of the stack flow monitors and provide a written report to the

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Bureau of Air Regulation and the Compliance Authority. Based on the results of the study, the permittee may use the stack flow monitors to determine the actual heat input rates after providing written notification of this decision to the Bureau of Air Regulation and the Compliance Authority. Thereafter, the permittee shall use the fuel-based method as a backup method for determining the actual heat input rates.

- For FGD scrubber bypass operation, SO₂ emissions shall be monitored and determined in accordance with the "Crist Alternative Monitoring Plan" (File No. 07-D-AP). The permittee is authorized to bypass the FGD scrubber in accordance with the following conditions.
 - *Startup and Shutdown:* The permittee is authorized to bypass the FGD scrubber during the startup and shutdown of each emissions unit. The permittee may exclude SO₂ emissions collected during startup and shutdown from 30-day rolling compliance total. Although not limited, such periods of bypass are estimated to be less than 96 hours per year per unit.
 - *Short-Term Maintenance:* The permittee is authorized to bypass the FGD scrubber to conduct short-term maintenance to correct problems with limestone-gypsum management and operational problems with the FGD system. During such periods, the permittee shall include representative SO₂ emissions rates in the 30-day rolling compliance total. Such short-term maintenance periods are not considered part of long-term maintenance (annual routine maintenance, periodic pre-planned maintenance or repair for force majeure scrubber outages).
 - *Long-Term Maintenance:* The permittee is authorized to bypass the FGD scrubber to conduct annual routine maintenance of the FGD scrubber system. For such periods, the permittee may exclude up to 360 hours per calendar year from the 30-day rolling compliance total. The permittee is authorized to bypass the FGD scrubber to conduct periodic pre-planned scrubber maintenance (based on best practices) and scrubber repairs due to force majeure outages. For such periods, the permittee may exclude up to an additional 360 hours per calendar year from the 30-day rolling compliance total.

The permittee shall use the protocol in 40 CFR 75 to calculate the initial representative SO₂ emissions for bypass operations. If this initial conservative estimate indicates a compliance issue, the permittee shall recalculate and determine compliance using the representative SO₂ emissions based on the actual fuel sulfur content and fuel firing rate. During a FGD scrubber bypass, each unit shall remain in compliance with all other valid SO₂ emissions standards. *{Permitting Note: Permit No. 0330045-010-AC established an SO₂ emissions standard of 2.40 lb/MMBtu of heat input, 24-hour average, with compliance demonstrated by certified SO₂ continuous emission monitors.}*

- The effective date of this new emissions standard is 180 calendar days after initial startup, but no later than December 31, 2010.
- For each incident of scrubber bypass operation, the permittee shall record the time the bypass is initiated, the reason for the bypass and the duration of the bypass. The permittee shall identify and summarize each incident and duration of scrubber bypass on the quarterly excess emissions report.

Based on this request, the Department estimates the following potential annual SO₂ emissions in tons/year (TPY).

Scrubber Bypass: (2.4 lb SO₂/MMBtu) (12,304.6 MMBtu/hour) (720 hours/year) (ton/2000 lb) = 10,631 TPY

Scrubber On-Line: (0.20 lb SO₂/MMBtu) (12,304.6 MMBtu/hour) (8760-720 hours/year) (ton/2000 lb) = 9893 TPY

Total: 20,524 TPY (not including bypass for startup and shutdown)

According to EPA's acid rain database, past actual annual SO₂ emissions have been:

2006: 35,614 TPY

2007: 41,181 TPY

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

This is an average of 38,398 TPY. Therefore, the new emissions standard would reduce actual annual SO₂ emissions by at least 46%. The proposed SO₂ emissions standard recognizes good control (> 90% reduction) by the wet FGD system when fully functional and provides operational flexibility to conduct scheduled and an unplanned maintenance and repairs as necessary.

In addition, the applicant requests the following correction to Condition 4 of the permit, "The permittee shall install a baghouse on each silo designed to meet a particulate matter emissions specification of 0.01 grains per ~~dry~~ actual standard cubic feet. New and replacement bags shall be selected that meet this equipment specification." The baghouses control emissions from silos at ambient conditions. The specification should have been in terms of actual conditions. The Department agrees and revised the condition accordingly.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT (REVISION)

PERMITTEE

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

Air Permit No. 0330045-023-AC Crist Electric Generating Plant Existing Units 4 - 7 Wet FGD Project Permit Expires: December 31, 2010
--

Authorized Representative:

Mr. Theodore J. McCullough, V.P. of Power Generation

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 is required~~ to install and operate a wet flue gas desulfurization system in accordance with the requirements of this permit ~~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

(DRAFT)

Joseph Kahn, Director
Division of Air Resource Management

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

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 in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD).

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.~~

REVISION

Originally, Permit No. 0330045-015-AC authorized construction of the new wet FGD system for existing Units 4 to 7. Project No. 0330045-023-AC revises the original permit to establish a new SO₂ emissions standard based on the final design and capabilities of the equipment.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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 (DRAFT)

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 _x 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 _x 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 _x 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 _x 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 (CO₂), nitrogen oxides (NO_x), and sulfur dioxide (SO₂). 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. Flow and opacity will be continuously monitored on the bypass stacks. Emissions from the new wet FGD system will exhaust through a new stack, as described in Condition 3, below. Continuous emissions monitoring systems (CEMS) will be installed on the common stack to monitor SO₂ emissions.

{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.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. Wet FGD System for Units 4 – 7

EQUIPMENT AND CONSTRUCTION

2. Wet Flue Gas Desulfurization (FGD) System: The permittee ~~is authorized shall~~ shall ~~construct and operate~~ a new wet FGD system to control SO₂ 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 (SO₂) 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; ~~Rules 62-4.070 and 62-4.080, 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 SO₂ 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~~ powdered limestone unloading station, two closed silos, ~~two ball mills,~~ two limestone slurry storage mix 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 actual~~ dry actual 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.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. Wet FGD System for Units 4 – 7

EMISSIONS LIMITING AND PERFORMANCE STANDARDS

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. Plant-Wide SO₂ Limit: The SO₂ emissions from the combined operation of Units 4, 5, 6, and 7 shall not exceed 886.0 tons during any 30-day rolling total of FGD scrubber operational days.
- a. A “FGD scrubber operational day” shall be defined as a calendar day during which one or more of the boilers operated for at least 18 hours and the FGD scrubber was operational or only being bypassed for purposes of short-term maintenance as described below.
 - b. For normal operations, SO₂ emissions shall be determined by CEMS emissions data. The SO₂ mass emissions rates shall be calculated in terms of “pounds per day” for each calendar day of operation by summing the hourly mass emissions rates (lb/hour) determined from the actual heat input rates (MMBtu/hour) and the monitored emissions levels (lb/MMBtu). Initially, the actual heat input rates will be determined by fuel firing rates and heating values. The permittee shall conduct a study to determine the accuracy of the stack flow monitors and provide a written report to the Bureau of Air Regulation and the Compliance Authority. Based on the results of the study, the permittee may use the stack flow monitors to determine the actual heat input rates after providing written notification of this decision to the Bureau of Air Regulation and the Compliance Authority. Thereafter, the permittee shall use the fuel-based method as a backup method for determining the actual heat input rates.
 - c. For FGD scrubber bypass operation, SO₂ emissions shall be monitored and determined in accordance with the “Crist Alternative Monitoring Plan” (File No. 07-D-AP). The permittee is authorized to bypass the FGD scrubber in accordance with the following conditions.
 - 1) Startup and Shutdown: The permittee is authorized to bypass the FGD scrubber during the startup and shutdown of each emissions unit. The permittee may exclude SO₂ emissions collected during startup and shutdown from 30-day rolling compliance total. Although not limited, such periods of bypass are estimated to be less than 96 hours per year per unit.
 - 2) Short-Term Maintenance: The permittee is authorized to bypass the FGD scrubber to conduct short-term maintenance to correct problems with limestone-gypsum management and operational problems with the FGD system. During such periods, the permittee shall include representative SO₂ emissions rates in the 30-day rolling compliance total. Such short-term maintenance periods are not considered part of long-term maintenance (annual routine maintenance, periodic pre-planned maintenance or repair for force majeure scrubber outages).
 - 3) Long-Term Maintenance: The permittee is authorized to bypass the FGD scrubber to conduct annual routine maintenance of the FGD scrubber system. For such periods, the permittee may exclude up to 360 hours per calendar year from the 30-day rolling compliance total. The permittee is authorized to bypass the FGD scrubber to conduct periodic pre-planned scrubber maintenance (based on best practices) and scrubber repairs due to force majeure outages. For such periods, the permittee may exclude up to an additional 360 hours per calendar year from the 30-day rolling compliance total.

The permittee shall use the protocol in 40 CFR 75 to calculate the initial representative SO₂ emissions for bypass operations. If this initial conservative estimate indicates a compliance issue, the permittee shall recalculate and determine compliance using the representative SO₂ emissions based on the actual

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. Wet FGD System for Units 4 – 7

~~fuel sulfur content and fuel firing rate. During a FGD scrubber bypass, each unit shall remain in compliance with all other valid SO₂ emissions standards. {Permitting Note: Permit No. 0330045-010-AC established an SO₂ emissions standard of 2.40 lb/MMBtu of heat input, 24-hour average, with compliance demonstrated by certified SO₂ continuous emission monitors.}~~

- d. ~~The effective date of this new emissions standard is 180 calendar days after initial startup, but no later than December 31, 2010.~~

~~[Application No. 0330045-023-AC and Rule 62-4.080(1), F.A.C.]~~

~~8.—9. 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.—10. Circumvention: Unless otherwise authorized by this permit, 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.—11. 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:~~

- a. To prevent emissions of unconfined particulate matter while unloading fly ash, ash leaving the facility shall be hauled in closed container trucks or barges. Ash and gypsum being disposed of on plant property will be mixed with water as needed to reduce fugitive emissions.
- b. The plant ash and gypsum haul roads shall be watered as necessary to control any unconfined particulate matter.
- c. 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.
- d. The coal pile shall be packed regularly to help in the prevention of coal pile fires and reduce fugitive dust.
- e. 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~~

~~12. 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.]~~

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. Wet FGD System for Units 4 - 7

CONTINUOUS MONITORING REQUIREMENTS

~~13.~~ 12. Continuous Monitoring: Existing Units 4 - 7 are subject to the federal Acid Rain monitoring requirements for opacity, stack gas flow rates, and emissions of CO₂, NO_x and SO₂. 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 CO₂, NO_x and SO₂. The new equipment shall be certified within 60 days of startup of the new wet FGD system. If the ~~existing~~ continuous opacity monitoring systems (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. and 62-214, F.A.C.]

RECORDS AND REPORTS

~~14.~~ 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.]

~~15.~~ 14. Notifications for Long-Term 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~~ For periods of FGD scrubber bypass due to annual routine maintenance and pre-planned scrubber maintenance based on best practices, the permittee shall notify the Compliance Authority at least three days prior to commencing the scheduled activity. For periods of repair due to force majeure FGD scrubber outages, the permittee shall notify the Compliance Authority as soon as possible, but no later than 24 hours of beginning a FGD scrubber outage. Notification may be made by letter, telephone, facsimile or e-mail. Each notification shall include 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 or short-term maintenance 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.]

15. Scrubber Bypass Records: For each incident of scrubber bypass operation, the permittee shall record the time the bypass was initiated, the reason for the bypass, the duration of the bypass, the average SO₂ emissions (lb/hour and lb/MMBtu) during the bypass, and the corrective actions taken to return the wet FGD system to service. The permittee shall identify and summarize each incident and duration of scrubber bypass on the quarterly excess emissions report.

SECTION 4. APPENDICES
CONTENTS

Appendix CF. Citation Format
Appendix GC. General Conditions
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 624.160, 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

{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 62210.700(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 62210.700(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

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.

SECTION 4. APPENDIX SC
STANDARD CONDITIONS

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

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.]

Livingston, Sylvania

From: Livingston, Sylvania
Sent: Thursday, November 06, 2008 12:00 PM
To: 'TJMCCULL@southernco.com'
Cc: 'gdwaters@southernco.com'; 'tdavis@ectinc.com'; Bradburn, Rick; 'forney.kathleen@epamail.epa.gov'; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: Gulf Power Company - Crist Electric Generating Plant; 0330045-023-AC

Dear Sir/ Madam:

Attached is the official **Notice of Draft Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0330045.023.AC.D_pdf.zip

Owner/Company Name: GULF POWER COMPANY
Facility Name: CRIST ELECTRIC GENERATING PLANT
Project Number: 0330045-023-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION/ Revised Wet Flue Gas Desulfurization Project
Facility County: ESCAMBIA

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.



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gned_Intent.p...

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-0771

Livingston, Sylvia

From: McCullough, Theodore J. [TJMCCULL@southernco.com]
To: Livingston, Sylvia
Sent: Thursday, November 06, 2008 12:29 PM
Subject: Read: Gulf Power Company - Crist Electric Generating Plant; 0330045-023-AC

Your message

To: TJMCCULL@southernco.com
Subject:

was read on 11/6/2008 12:29 PM.

Livingston, Sylvia

From: Waters, G. Dwain [GDWATERS@southernco.com]
Sent: Thursday, November 06, 2008 3:11 PM
To: Livingston, Sylvia; McCullough, Theodore J.
Cc: TDAVIS@ECTINC.COM; Bradburn, Rick; forney.kathleen@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: Re: Gulf Power Company - Crist Electric Generating Plant; 0330045-023-AC

Gulf has received the proposed Crist permit revision. Thanks, Dwain

Dwain Waters, QEP

From: Livingston, Sylvia
To: McCullough, Theodore J.
Cc: Waters, G. Dwain; tdavis@ectinc.com ; Bradburn, Rick ; forney.kathleen@epamail.epa.gov ; Gibson, Victoria ; Koerner, Jeff ; Walker, Elizabeth (AIR)
Sent: Thu Nov 06 10:59:59 2008
Subject: Gulf Power Company - Crist Electric Generating Plant; 0330045-023-AC

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http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0330045.023.AC.D_pdf.zip

Owner/Company Name: GULF POWER COMPANY
Facility Name: CRIST ELECTRIC GENERATING PLANT
Project Number: 0330045-023-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION/ Revised Wet Flue Gas Desulfurization Project
Facility County: ESCAMBIA

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<<0330045-023-AC_Signed_Intent.pdf>>

11/6/2008

Livingston, Sylvia

From: Tom Davis [tdavis@ectinc.com]
Sent: Thursday, November 06, 2008 1:00 PM
To: Livingston, Sylvia
Subject: RE: Gulf Power Company - Crist Electric Generating Plant; 0330045-023-AC

Sylvia,

I have received and can view the attachment provided below.

Thanks.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, November 06, 2008 12:00 PM
To: TJMCCULL@southernco.com
Cc: gdwaters@southernco.com; tdavis@ectinc.com; Bradburn, Rick; forney.kathleen@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: Gulf Power Company - Crist Electric Generating Plant; 0330045-023-AC

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11/6/2008