

One Energy Place
Pensacola, Florida 32520

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BUREAU OF AIR REGULATION



Certified Mail

August 28, 2009

Cleve Holladay
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Holladay:

RE: CRIST ELECTRIC GENERATING PLANT
HYDRATED LIME INJECTION PROJECT
DRAFT PERMIT COMMENTS
Permit No: 0330045-026-AC

Please find enclosed Gulf Power's comments regarding the recently issued draft air construction permit for the Crist Temporary Hydrated Lime Injection System (#0330045-26-AC).

We greatly appreciate your efforts to work with us regarding the startup of this emission control system. Please call me regarding any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Dwain Waters Q.E.P." The signature is written in a cursive style.

G. Dwain Waters, Q.E.P.
Special Projects and Environmental Assets Coordinator

cc: w/att: Wright, Terry, Gulf Power Company
John Dominey, Gulf Power Company
Greg Terry, Gulf Power Company
Rick Bradburn, FDEP Northwest District Office, Pensacola, Florida

Gulf Power Company
Crist Temporary Hydrated Lime Injection Draft Construction Permit Comments:
Project No. 0330045-026-AC
August 28, 2009

Comments:

- 1) Section 3. Emissions Unit Specific Conditions (Page 5 of 6). 3. Operation: Please revise the condition to read: "The permittee is authorized to install and operate a temporary HLI system as determined necessary by the permittee to mitigate a visible plume and to evaluate the effectiveness of the equipment." This revision clarifies that operation is solely determined by the source and that the "circumvention" provision as outlined in the Common Conditions (Section 4. Appendix C) is not applicable to operation of the temporary HLI system.
- 2) Section 3. Emissions Unit Specific Conditions (Page 5 of 6). 4. Required Performance Tests: Please revise the condition to read: "The permittee shall conduct stack tests in accordance with EPA Method 8, or 8A or 8B to determine the SAM emissions subject to the following conditions:" This revision allows an alternative test protocol other than Method 8 to be used to measure SAM emissions. Method 8 was originally designed for the sulfur acid industry and is not the appropriate test method for a fossil fired utility boiler due to interferences from sulfates from particulate matter and sulfur dioxide. Method 8A or 8B is the preferred test method.
- 3) Section 3. Emissions Unit Specific Conditions (Page 5 of 6). 4. Required Performance Tests: a. Please clarify that condition "a" allows that the test location may be post the scrubber, i.e. the stack, since there may not be a suitable test location "after the HLI injection point" before the scrubber.
- 4) Section 3. Emissions Unit Specific Conditions (Page 5 of 6). 4. Required Performance Tests: b. Please revise condition "b" to be similar to condition "a" regarding the description of the operating rates of the units. Please revise the condition to read: "...Each test run shall be conducted while firing only coal with the HLI system on at the highest boiler operating rates possible for the given system demands...."
- 5) Section 3. Emissions Unit Specific Conditions (Page 5 of 6). 4. Required Performance Tests: e. Please revise condition "e" to read: "All required tests shall be conducted within 90 days of the startup of the temporary HLI system."