

# Florida Department of Environmental Protection

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## Memorandum

To: Trina Vielhauer, Bureau of Air Regulation  
Through: Jeff Koerner, New Source Review Section *JK*  
From: Cleve Holladay, New Source Review Section *ceh*  
Date: August 28, 2009  
Subject: Draft Minor Source Air Construction Permit  
Project No. 0330045-027-AC  
Gulf Power Company, Crist Electric Generating Plant  
Unit 7 Steam Turbine Upgrade

The purpose of this project is to upgrade the high-pressure (HP), intermediate-pressure (IP) and the low-pressure (LP) steam turbine sections of existing Unit 7 at the Crist Electric Generating Plant. The turbine upgrade project will improve efficiency and should produce approximately 21 additional megawatts of power from the same steam production and fuel firing. The HP/IP section will be upgraded in the fall of 2009 and the LP section will be upgraded during the next regularly scheduled outage in 2012. The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. The project is not considered a new source review reform project. Day 90 of the permitting time clock is September 14, 2009. I recommend your approval of the attached draft permit package.

Attachments

TLV/jfk/cgh

**P.E. CERTIFICATION STATEMENT**

**PERMITTEE**

Gulf Power  
One Energy Place  
Pensacola, Florida 32520-0329

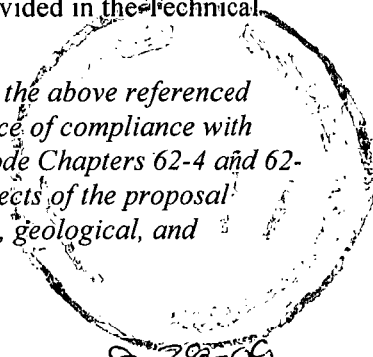
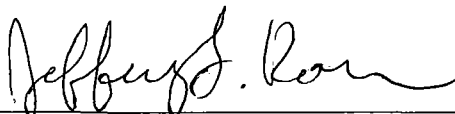
Draft Permit No. 0330045-027-AC  
Crist Electric Generating Plant  
Unit 7 Steam Turbine Upgrade  
Escambia County, Florida

**PROJECT DESCRIPTION**

The purpose of this project is to upgrade the high-pressure (HP), intermediate-pressure (IP) and the low-pressure (LP) steam turbine sections of existing Unit 7 at the Crist Electric Generating Plant. The turbine upgrade project will improve efficiency and should produce approximately 21 additional megawatts of power from the same steam production and fuel firing. The HP/IP section will be upgraded in the fall of 2009 and the LP section will be upgraded during the next regularly scheduled outage in 2012.

This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (F.A.C.) and is not subject to the preconstruction review requirements for major stationary sources in 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, civil, mechanical, structural, hydrological, geological, and meteorological features).*



Jeffery Koerner, P.E.  
Registration Number 49441

8-28-09

(Date)



# 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

August 28, 2009

Mr. Glenn Waters, Special Projects and Environmental Coordinator  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0329

Re: Project No. 0330045-027-AC  
Gulf Power Company, Crist Electric Generating Plant  
Unit 7 Steam Turbine Upgrade Project

Dear Mr. Waters:

On June 16, 2009, you submitted an application requesting authorization upgrade the high-pressure (HP), intermediate-pressure (IP) and the low-pressure (LP) steam turbine sections of existing Unit 7 at the Crist Electric Generating Plant. The existing facility is located in Escambia County at Governor's Bayou off 10 Mile Road in Pensacola, Florida. Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Technical Evaluation and Preliminary Determination; and the Draft Permit with Appendices. 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, Cleve Holladay, at 850-921-8986.

Sincerely,

A handwritten signature in black ink that reads "Trina Vielhauer". The signature is written in a cursive, flowing style.

Trina Vielhauer, Chief  
Bureau of Air Regulation

Enclosures

TLV/jfk/cgh

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**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

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

Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0329

Project No. 0330045-027-AC  
Minor Air Construction Permit

*Authorized Representative:*

Mr. Glenn Waters, Special Projects and Environmental Coordinator

Crist Electric Generating Plant  
Unit 7 Steam Turbine Upgrade  
Escambia County, Florida

**Facility Location:** Gulf Power Company operates the Crist Electric Generating Plant, which is located in Escambia County at Governor's Bayou off 10 Mile Road in Pensacola, Florida.

**Project:** The applicant requests authority to upgrade the high-pressure (HP), intermediate-pressure (IP) and the low-pressure (LP) steam turbine sections in existing Unit 7 to improve efficiency and produce approximately 21 additional megawatts of power from the same amount of steam produced by the same amount of fuel. The HP/IP steam turbine sections will be upgraded in the fall of 2009. The LP steam turbine section is scheduled for upgrade during the next regularly scheduled outage in 2012. The project is not expected to result in any increase in actual emissions. 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 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

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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

**Mediation:** Mediation is not available in this proceeding.

**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

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Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

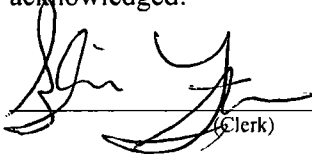
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 8/28/09 to the persons listed below.

- Mr. Glenn Waters, Gulf Power Company (gdwaters@southernco.com)
- Mr. Gregory Terry, Gulf Power Company (gnterry@southernco.com)
- Mr. Rick Bradburn, Northwest District Office (rick.bradburn@dep.state.fl.us)
- Mr. Mike Halpin, DEP Siting Office (mike.halpin@dep.state.fl.us)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)

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)

8/28/09  
(Date)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection  
Division of Air Resource Management, Bureau of Air Regulation  
Draft Air Construction Permit  
Project No. 0330045-027-AC  
Gulf Power Company, Crist Electric Plant  
Escambia County, Florida

**Applicant:** The applicant for this project is Gulf Power Company. The applicant's authorized representative and mailing address is: Glenn Waters, Special Projects and Environmental Coordinator, Gulf Power Company, Crist Electric Generating Plant, One Energy Place, Pensacola, Florida 32520-0329.

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

**Project:** The applicant requests authority to upgrade the high-pressure (HP), intermediate-pressure (IP) and the low-pressure (LP) steam turbine sections in existing Unit 7 to improve efficiency and produce approximately 21 additional megawatts of power from the same amount of steam produced by the same amount of fuel. The HP/IP steam turbine sections will be upgraded in the fall of 2009. The LP steam turbine section is scheduled for upgrade during the next regularly scheduled outage in 2012. The project is not expected to result in any increase in actual emissions.

**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 by entering draft permit number:  
<http://www.dep.state.fl.us/air/emission/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 period of 14 days from the date of publication of this 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 the 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.

(Public Notice to be Published in the Newspaper)

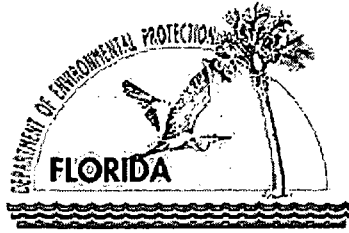
**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's 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  
Facility ID No. 0330045

**PROJECT**

Project No. 0330045-027-AC  
Application for Minor Source Air Construction Permit  
Unit 7 Steam Turbine Efficiency Upgrade

**COUNTY**

Escambia County, Florida

**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

August 28, 2009

## **1. GENERAL PROJECT INFORMATION**

### **Air Pollution Regulations**

Projects at stationary sources 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 applicable 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 categories. 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.

### **Glossary of Common Terms**

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

### **Facility Description and Location**

Gulf Power Company operates the existing Crist Electric Generating Plant, which is categorized under Standard Industrial Classification Code No. 4911. The existing facility consists of Units 4 - 7 (EU-004 – EU-007), which are coal-fired boilers. Units 4 and 5 control particulate with electrostatic precipitators (ESP) and control nitrogen oxides (NO<sub>x</sub>) with selective non-catalytic reduction (SNCR). Unit 6 controls particulate with an ESP and controls NO<sub>x</sub> with low-NO<sub>x</sub> burners and a SNCR system. Unit 7 controls particulate with an ESP and controls NO<sub>x</sub> with low-NO<sub>x</sub> burners and a selective catalytic reduction (SCR) system. The facility is located in Escambia County at Governor's Bayou off 10 Mile Road in Pensacola, Florida. The UTM coordinates of the existing facility are Zone 16, 478.5 km East, and 3381.44 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

### **Facility Regulatory Categories**

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates 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**

Existing Unit 7 is a 578-megawatt (MW) coal-fired boiler with a maximum heat input rate of 6406 MMBtu/hour. On June 16, 2009, the applicant requested authorization to improve the overall efficiency of Unit 7 by upgrading the following steam turbine sections: the high-pressure (HP) section, the intermediate-pressure (IP) section and the low-pressure (LP) section. The project is expected to result in an additional 21 MW of electrical generation from the same amount of steam generated by the same amount of fuel. The upgrades are scheduled in two phases. The HP and IP sections will be upgraded in the fall of 2009. The LP section is scheduled to be upgraded in 2012.

## 2. PSD APPLICABILITY

### General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, 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. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 5 tons per year or more of lead;
- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO<sub>x</sub>); sulfur dioxide (SO<sub>2</sub>); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM<sub>10</sub>); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H<sub>2</sub>S); total reduced sulfur (TRS), including H<sub>2</sub>S; reduced sulfur compounds, including H<sub>2</sub>S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO<sub>2</sub> and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 microgram per cubic meter (µg/m<sup>3</sup>), 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions 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

Although the proposed project is intended to provide an additional 21 MW of power, no changes to the boiler are necessary to realize the efficiency improvement. The applicant projects no increases in emissions resulting from the steam turbine improvements.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The applicant notes that there are several projects under way to install air pollution control equipment, including:

- Air Permit No. 0330045-005-AC authorized installation of an SCR system and upgrades to the existing ESP, which is complete.
- Air Permit No. 0330045-023-AC authorizes construction of a new wet flue gas desulfurization (FGD) system to reduce sulfur dioxide (SO<sub>2</sub>) emissions from existing Units 4 - 7, which should be complete by the end of 2009.
- On May 27, 2009, the Department issued Draft Permit No. 0330045-026-AC authorizing installation of a temporary hydrated lime injection (HLI) system for Units 4 – 7 to mitigate SAM emissions and a potential visible plume.
- The applicant is preparing a future application to install an SCR system on Unit 6, which will also include a permanent project to install a HLI system for Units 4 – 7.

The applicant provided the following emissions comparison for Unit 7 to show the expected impacts from the ongoing projects to install air pollution controls.

Table A. Summary of Future Expected Emissions

Pollutant	Annual Emissions, Tons/Year		
	Baseline Emissions	Future Expected Emissions	Change
CO	355	418	63
NO <sub>x</sub>	2959	1462	-1497
PM/PM <sub>10</sub> /PM <sub>2.5</sub>	266	20	-246
SO <sub>2</sub>	19,476	3,457	-16,019
VOC	42	49	7
SAM	121	49	-72

As shown in the above table, emissions from this plant are expected to decrease after completing installation of authorized the air pollution control equipment.

### 3. DEPARTMENT REVIEW

The proposed upgrades are to components associated with steam-electrical production and does not affect the boiler components or combustion characteristics. The project will improve unit efficiency while using the same amount of fuel and steam flow. The project is intended to increase power production by 21 MW, which is less than a 4% increase for Unit 7. An SCR system has been installed on unit 7 and is in operation. The wet FGD system should be operational for all four boilers by the end of 2009. It is unlikely that Unit 7 will be dispatched any differently because of the steam turbine improvement project. No increases in emissions are expected.

### 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. Cleve Holladay 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**

## **PERMITTEE**

Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520

Air Permit No. 0330045-027-AC  
Permit Expires: July 1, 2013

Authorized Representative:  
Mr. Glenn Waters, Special Projects and Environmental Coordinator

Minor Air Construction Permit  
Crist Electric Generating Plant  
Unit 7 Steam Turbine Upgrade

## **PROJECT**

This is the final air construction permit, which authorizes the permittee to upgrade the high-pressure (HP), intermediate-pressure (IP) and the low-pressure (LP) steam turbine sections of Unit 7. The project is expected to result in an additional 21 MW of electrical generation from the same amount of steam generated by the same amount of fuel. The proposed work will be conducted at the existing Crist Electric Generating Plant, which is located in Escambia County at Governor's Bayou off 10 Mile Road in Pensacola, Florida. The UTM coordinates are Zone 16, 478.50 km East, and 3381.44 km North.

This final permit is organized into the following sections: Section 1 (General Information), Section 2 (Administrative Requirements), Section 3 (Emissions Unit Specific Conditions) and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

## **STATEMENT OF BASIS**

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

**(DRAFT)**

\_\_\_\_\_  
Joseph Kahn, Director  
Division of Air Resource Management

\_\_\_\_\_  
(Date)

# **DRAFT PERMIT**

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Executed in Tallahassee, Florida

**(DRAFT)**

\_\_\_\_\_  
Joseph Kahn, Director  
Division of Air Resource Management

\_\_\_\_\_  
(Date)

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on \_\_\_\_\_ **(DRAFT)** \_\_\_\_\_ to the persons listed below.

- Mr. Glenn Waters, Gulf Power Company (gdwaters@southernco.com)
- Mr. Gregory Terry, Gulf Power Company (gnterry@southernco.com)
- Mr. Rick Bradburn, Northwest District Office (rick.bradburn@dep.state.fl.us)
- Mr. Mike Halpin, DEP Siting Office (mike.halpin@dep.state.fl.us)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)

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.

**(DRAFT)**

\_\_\_\_\_  
(Clerk)

\_\_\_\_\_  
(Date)

**FACILITY DESCRIPTION**

Gulf Power Company operates the existing Crist Electric Generating Plant, which is categorized under Standard Industrial Classification Code No. 4911. The existing facility consists of Units 4 - 7 (EU-004 – EU-007), which are coal-fired boilers. Units 4 and 5 control particulate with electrostatic precipitators (ESP) and control nitrogen oxides (NO<sub>x</sub>) with selective non-catalytic reduction (SNCR). Unit 6 controls particulate with an ESP and controls NO<sub>x</sub> with low-NO<sub>x</sub> burners and a SNCR system. Unit 7 controls particulate with an ESP and controls NO<sub>x</sub> with low-NO<sub>x</sub> burners and a selective catalytic reduction (SCR) system.

**PROPOSED PROJECT**

Existing Unit 7 is a 578-megawatt (MW) coal-fired boiler with a maximum heat input rate of 6406 MMBtu/hour. The permittee requested authorization to improve the overall efficiency of Unit 7 by upgrading the following steam turbine sections: the high-pressure (HP) section, the intermediate-pressure (IP) section and the low-pressure (LP) section. The project is expected to result in an additional 21 MW of electrical generation from the same amount of steam generated by the same amount of fuel. The upgrades are scheduled in two phases. The HP and IP sections are scheduled for upgrade in the fall of 2009. The LP section is scheduled for upgrade during the regularly scheduled outage in 2012.

**FACILITY REGULATORY CLASSIFICATION**

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act (CAA).
- 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(PSD), F.A.C.



## SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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1. Permitting Authority: The permitting authority for this project is the Bureau of Air Regulation, Division of Air Resource Management, Florida Department of Environmental Protection (Department). The Bureau of Air Regulation's mailing address 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 at 160 Governmental Center, Pensacola, Florida 32501-5794.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified 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.

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
007	Unit 7 (Phase I Acid Rain Unit) is a Foster Wheeler front and rear wall fired, dry bottom boiler that began commercial operation on August 1, 1973. <i>Fuels:</i> coal, natural gas, new No. 2 fuel oil and/or on-specification used oil <i>Capacity:</i> 6406 MMBtu/hour when firing pulverized coal and/or natural gas <i>PM Controls:</i> Cold side electrostatic precipitator <i>NOx Controls:</i> Low NOx burners and selective catalytic reduction <i>Continuous Monitors:</i> CO <sub>2</sub> , NO <sub>x</sub> , SO <sub>2</sub> , opacity, stack gas flow, and ammonia injection rate

### PROPOSED WORK

1. Upgrades: The permittee is authorized to upgrade the following steam turbine sections for Unit 7:

a. High-Pressure (HP) and Intermediate-Pressure (IP) Sections:

- 1) Full Integral, No Through Bore HP/IP Rotor;
- 2) Coupling Spacer, Nuts and Bolts – one set;
- 3) Triple Pin Control Stage Blading;
- 4) New Rotating and Stationary Blading;
- 5) Inner Cylinder w/Joint Bolting – Support/Alignment Hardware;
- 6) Separately Supported Nozzle Chambers;
- 7) Replacement Bell Seals;
- 8) New Piston Seal Rings for HP Exhaust, IP inlet sleeves, IP Exhaust;
- 9) Retractable spring back seals for HP dummy;
- 10) Vent Value (1); and
- 11) Other associated work.

The preliminary delivery and installation schedule for the new HP/IP equipment is the fall of 2009.

b. Low-pressure (LP) Sections:

- 1) Two Model No. BB71 LP turbine replacement modules with 5.6 square meters upgrade replacement (or equivalent) with standard assembly hardware.
- 2) Includes four tilt pad bearings to accommodate heavier mono-block rotors.

The preliminary delivery and installation schedule for the new LP equipment is the regularly scheduled 2012 outage.

[Application No. 0330045-027-AC]

2. Notification: The permittee shall provide a preliminary construction schedule to the Compliance Authority before beginning construction. The schedule shall be updated as necessary. The permittee shall notify the Compliance Authority within 10 days of completing construction on of each phase. [Rule 62-4.070(3), F.A.C.]
3. Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for this emissions unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulatory requirements. The permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, record keeping, reporting, etc. This project does not change the permitted capacity of Unit 7. [Rule 62-4.070(3), F.A.C.]

**SECTION 4. APPENDICES (DRAFT)**

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**Contents**

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

**SECTION 4. APPENDIX A (DRAFT)**

**Citation Formats and Glossary of Common Terms**

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**CITATION FORMATS**

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

**Old Permit Numbers**

Example: Permit No. AC50-123456 or 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 for that county  
“001” identifies the specific permit project number  
“AC” identifies the permit as an air construction permit  
“AF” identifies the permit as a minor source federally enforceable state operation permit  
“AO” identifies the permit as a minor source air operation permit  
“AV” identifies the permit as a major Title V air operation permit

**PSD Permit Numbers**

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of 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 number

**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

**GLOSSARY OF COMMON TERMS**

° F: degrees Fahrenheit

µg: microgram

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System  
(Department’s database)

**BACT:** best available control technology

**bhp:** brake horsepower

**Btu:** British thermal units

**CAM:** compliance assurance monitoring

**CEMS:** continuous emissions monitoring system

**cfm:** cubic feet per minute

**CFR:** Code of Federal Regulations

## SECTION 4. APPENDIX A (DRAFT)

### Citation Formats and Glossary of Common Terms

<b>CAA:</b> Clean Air Act	<b>NESHAP:</b> National Emissions Standards for Hazardous Air Pollutants
<b>CMS:</b> continuous monitoring system	<b>NO<sub>x</sub>:</b> nitrogen oxides
<b>CO:</b> carbon monoxide	<b>NSPS:</b> New Source Performance Standards
<b>CO<sub>2</sub>:</b> carbon dioxide	<b>O&amp;M:</b> operation and maintenance
<b>COMS:</b> continuous opacity monitoring system	<b>O<sub>2</sub>:</b> oxygen
<b>DARM:</b> Division of Air Resource Management	<b>Pb:</b> lead
<b>DEP:</b> Department of Environmental Protection	<b>PM:</b> particulate matter
<b>Department:</b> Department of Environmental Protection	<b>PM<sub>10</sub>:</b> particulate matter with a mean aerodynamic diameter of 10 microns or less
<b>dscf:</b> dry standard cubic feet	<b>ppm:</b> parts per million
<b>dscfm:</b> dry standard cubic feet per minute	<b>ppmv:</b> parts per million by volume
<b>EPA:</b> Environmental Protection Agency	<b>ppmvd:</b> parts per million by volume, dry basis
<b>ESP:</b> electrostatic precipitator (control system for reducing particulate matter)	<b>QA:</b> quality assurance
<b>EU:</b> emissions unit	<b>QC:</b> quality control
<b>F:</b> fluoride	<b>PSD:</b> prevention of significant deterioration
<b>F.A.C.:</b> Florida Administrative Code	<b>psi:</b> pounds per square inch
<b>F.A.W.:</b> Florida Administrative Weekly	<b>PTE:</b> potential to emit
<b>F.D.:</b> forced draft	<b>RACT:</b> reasonably available control technology
<b>F.S.:</b> Florida Statutes	<b>RATA:</b> relative accuracy test audit
<b>FGD:</b> flue gas desulfurization	<b>RBLC:</b> EPA's RACT/BACT/LAER Clearinghouse
<b>FGR:</b> flue gas recirculation	<b>SAM:</b> sulfuric acid mist
<b>ft<sup>2</sup>:</b> square feet	<b>scf:</b> standard cubic feet
<b>ft<sup>3</sup>:</b> cubic feet	<b>scfm:</b> standard cubic feet per minute
<b>gpm:</b> gallons per minute	<b>SIC:</b> standard industrial classification code
<b>gr:</b> grains	<b>SIP:</b> State Implementation Plan
<b>HAP:</b> hazardous air pollutant	<b>SNCR:</b> selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
<b>Hg:</b> mercury	<b>SO<sub>2</sub>:</b> sulfur dioxide
<b>I.D.:</b> induced draft	<b>TPD:</b> tons/day
<b>ID:</b> identification	<b>TPH:</b> tons per hour
<b>kPa:</b> kilopascals	<b>TPY:</b> tons per year
<b>lb:</b> pound	<b>TRS:</b> total reduced sulfur
<b>MACT:</b> maximum achievable technology	<b>UTM:</b> Universal Transverse Mercator coordinate system
<b>MMBtu:</b> million British thermal units	<b>VE:</b> visible emissions
<b>MSDS:</b> material safety data sheets	<b>VOC:</b> volatile organic compounds
<b>MW:</b> megawatt	

**SECTION 4. APPENDIX B (DRAFT)**

**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 403.141, 403.727, or 403.859 through 403.861, F.S. 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 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any 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 of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and 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 and 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 reasonable times, access to the premises where the permitted activity is located or conducted to:
  - a. Have access to and copy any records that must be kept under 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 noncompliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time then noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

**SECTION 4. APPENDIX B (DRAFT)**

**General Conditions**

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. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with 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;
  - b. Determination of Prevention of Significant Deterioration (not applicable); and
  - c. Compliance with New Source Performance Standards (not applicable).
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 for 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:
    - (a) The date, exact place, and time of sampling or measurements;
    - (b) The person responsible for performing the sampling or measurements;
    - (c) The dates analyses were performed;
    - (d) The person responsible for performing the analyses;
    - (e) The analytical techniques or methods used;
    - (f) 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.

## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Friday, August 28, 2009 2:47 PM  
**To:** 'gdwaters@southernco.com'  
**Cc:** 'gnterry@southernco.com'; Bradburn, Rick; Halpin, Mike; Gibson, Victoria; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'oquendo.ana@epa.gov'; Holladay, Cleve; Walker, Elizabeth (AIR)  
**Subject:** Gulf Power Company - Crist Electric Generating Plant; 0330045-027-AC  
**Attachments:** 0330045-027-AC\_Intent.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** 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".

*Note: 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/0330045.027.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0330045.027.AC.D_pdf.zip)

**Owner/Company Name:** GULF POWER COMPANY  
**Facility Name:** CRIST ELECTRIC GENERATING PLANT  
**Project Number:** 0330045-027-AC  
**Permit Status:** DRAFT  
**Permit Activity:** CONSTRUCTION/ UNIT 7 TURBINE EFFICIENCY UPGR  
**Facility County:** ESCAMBIA  
**Processor:** Cleve Holladay

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

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)



## Livingston, Sylvia

---

**From:** Waters, G. Dwain [GDWATERS@southernco.com]  
**Sent:** Friday, August 28, 2009 3:14 PM  
**To:** Livingston, Sylvia  
**Cc:** Terry, Greg N.; Bradburn, Rick; Halpin, Mike; Gibson, Victoria; forney.kathleen@epa.gov; abrams.heather@epa.gov; oquendo.ana@epa.gov; Holladay, Cleve; Walker, Elizabeth (AIR)  
**Subject:** RE: Gulf Power Company - Crist Electric Generating Plant; 0330045-027-AC

Gulf Power has received the draft Crist Unit 7 Turbine Air Construction Permit.  
Thanks, Dwain Waters

G. Dwain Waters, Q.E.P.  
Special Projects and Environmental Assets Coordinator  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0328  
Phone: (850) 444-6527  
Cell: (850) 336-6527  
Fax: (850) 444-6080  
[gdwaters@southernco.com](mailto:gdwaters@southernco.com)

---

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Friday, August 28, 2009 1:47 PM  
**To:** Waters, G. Dwain  
**Cc:** Terry, Greg N.; Bradburn, Rick; Halpin, Mike; Gibson, Victoria; forney.kathleen@epa.gov; abrams.heather@epa.gov; oquendo.ana@epa.gov; Holladay, Cleve; Walker, Elizabeth (AIR)  
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*Note: 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:**

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**Owner/Company Name:** GULF POWER COMPANY  
**Facility Name:** CRIST ELECTRIC GENERATING PLANT  
**Project Number:** 0330045-027-AC  
**Permit Status:** DRAFT  
**Permit Activity:** CONSTRUCTION/ UNIT 7 TURBINE EFFICIENCY UPGR  
**Facility County:** ESCAMBIA  
**Processor:** Cleve Holladay