

One Energy Place  
Pensacola, Florida 32520

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September 20, 2010

Mr. Jonathan Holtom P.E.  
Florida Department of Environmental Protection  
Division of Air Resources Management  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, Florida 32399-2400

Dear Mr. Holtom:

RE: CRIST ELECTRIC GENERATING PLANT  
COMMENTS ON PROPOSED - TITLE V PERMIT REVISION  
AIR PERMIT NO. 033045-031-AV

Please find attached Gulf Power Comments on the "Draft" Crist Proposed Title V Permit Revision of which the "Intent to Issue" was public noticed on September 6, 2010. Thanks again for the opportunity to comment and we look forward in working with you to resolve these few items of interest.

Please call me at (850) 444 – 6527 regarding any questions regarding these comments.

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: Greg Terry, Gulf Power  
John Dominey, Gulf Power  
Terry Wright, Gulf Power  
Rusty Meharg, Gulf Power  
Rick Bradburn, FDEP NW District Office, Pensacola, FL

**Crist Draft Title V Comments:**  
**Facility ID No: 0330045 - 031- AC**  
**September 20, 2010**

**Comments:**

- 1) Statement of Basis: (Page 4 of 6) Section III Emissions Units and Specific Conditions, Subsection A. 4. New Specific Condition A. 10 Operation of Sulfur Dioxide (SO<sub>2</sub>) Control Devices. There is a typo in the Sentence: “The FGD Scrubber operational day shall be defined....” The construction permit states “A FGD Scrubber operational day shall be defined....” We request “The” be revised to “A”.
- 2) Statement of Basis: (Page 4 of 6) Section III Emissions Units and Specific Conditions, Subsection A. 4. New Specific Condition A. 10 Operation of Sulfur Dioxide (SO<sub>2</sub>) Control Devices. 3. Long Term Maintenance. The last sentence in the section states: “During a FGD scrubber bypass, each unit shall remain in compliance with all other valid SO<sub>2</sub> emissions standards.” We request “valid” be changed to “applicable” which is a more appropriate description.
- 3) Statement of Basis: (Page 5 of 6) Section III Emissions Units and Specific Conditions, Subsection A. 7. New Specific Condition A. 14 Sulfur Dioxide (SO<sub>2</sub>) b. Solid Fuel. Condition notes reference to Permit No. AC17-234016. Please re-check reference. Permit No. 0330045-008-AC may be the correct reference.
- 4) Statement of Basis: (Page 5 of 6) Section III Emissions Units and Specific Conditions, Subsection A. 28. Continuous Monitoring. The last sentence in the section states: “Unless or until an alternative sampling procedure is approved by the Department, the existing monitoring system shall be maintained and used to demonstrate compliance with all existing emissions standards when operating in the bypass mode.” We believe this statement to be obsolete since Condition A.10. b. establishes an alternative procedure. Please delete the statement or reference Condition A. 10. b.
- 5) Statement of Basis: (Page 6 of 6) Section III Emissions Units and Specific Conditions, Subsection A. 31. Annual Compliance Test Required. The last sentence in the section states: “.... and Unit 015 shall be tested for VE.” Unit 015 is not listed in the Subsection B. Summary of Emissions Units. We request the addition of Unit 015. Limestone Handling Equipment under SECTION 1. FACILITY INFORMATION, Subsection B. Summary of Emissions Units, (Page 2 of 48). Also, the addition of Unit 016 Gypsum Handling Equipment is needed in the same section.
- 6) Statement of Basis: (Page 6 of 6) Section III Emissions Units and Specific Conditions, Subsection A. 31. Annual Compliance Test Required. We request the “Permitting Note” be moved into the Condition in lieu of being a permit note. “The annual SO<sub>2</sub> and NO<sub>x</sub> tests are required by Rule 62-297.310(7), F.A.C., can be done during the annual RATAs as satisfaction of this requirement, provided all other testing requirements specified in the permit are met. Once CEMS are installed and operational in the bypass stacks and continuous compliance can be demonstrated, completion of the annual RATAs will replace the need for SO<sub>2</sub> or NO<sub>x</sub> stack tests.”
- 7) Section III. (Page 11 of 48) Emissions Units and Specific Conditions, Subsection A. Emissions Units -004, -005, -006 and -007; Condition A. 10. Operation of Sulfur Dioxide (SO<sub>2</sub>) Control Devices. There is a typo in the Sentence: “The FGD Scrubber

- operational day shall be defined....” The construction permit states “A FGD Scrubber operational day shall be defined....” We request “The” be revised to “A”.
- 8) Section III. (Page 11 of 48) Emissions Units and Specific Conditions, Subsection A. Emissions Units -004, -005, -006 and -007; Condition A. 10. Operation of Sulfur Dioxide (SO<sub>2</sub>) Control Devices. b.3. Long Term Maintenance. (See Item #1 above). The last sentence in the section states: “During a FGD scrubber bypass, each unit shall remain in compliance with all other valid SO<sub>2</sub> emissions standards.” We request “valid” be changed to “applicable” which is a more appropriate description.
- 9) Section III. (Page 13 of 48) Emissions Units and Specific Conditions, Subsection A. Emissions Units -004, -005, -006 and -007; Condition A. 14 Sulfur Dioxide (SO<sub>2</sub>) b. Solid Fuel. (See Item #2 above.) Condition notes reference to Permit No. AC17-234016. Please re-check reference. Permit No. 0330045-008-AC may be the correct reference.
- 10) Section III. (Page 15 of 48) Emissions Units and Specific Conditions, Subsection A. Emissions Units -004, -005, -006 and -007; Subsection A. 28. Continuous Monitoring. (See Item #3 above.) The last sentence in the section states: “Unless or until an alternative sampling procedure is approved by the Department, the existing monitoring system shall be maintained and used to demonstrate compliance with all existing emissions standards when operating in the bypass mode.” We believe this statement to be obsolete since Condition A.10. b. establishes an alternative procedure. Please delete the statement or reference Condition A. 10. b.
- 11) Section III. (Page 16 of 48) Emissions Units and Specific Conditions, Subsection A. Emissions Units -004, -005, -006 and -007; Subsection A. 31. Annual Compliance Test Required. (See Item #5 above.) We request the “Permitting Note” be moved into the Condition in lieu of being a permit note. “The annual SO<sub>2</sub> and NO<sub>x</sub> tests are required by Rule 62-297.310(7), F.A.C., can be done during the annual RATAs as satisfaction of this requirement, provided all other testing requirements specified in the permit are met. Once CEMS are installed and operational in the bypass stacks and continuous compliance can be demonstrated, completion of the annual RATAs will replace the need for SO<sub>2</sub> or NO<sub>x</sub> stack tests.”