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Pensacola, Florida 32520

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November 30, 2009

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 RENEWAL
AIR PERMIT NO. 033045-025-AV

Please find attached Gulf Power Comments on the "Draft" Crist Proposed Title V Renewal Permit of which the "Intent to Issue" was public noticed on November 3, 2009. 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.".

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: 033045
Permit No. 033045-025-AV
November 30, 2009

Comments:

1. SECTION I. FACILITY INFORMATION; Subsection A. Facility Description: Please revise description to reflect “three fly ash silos” in lieu of “two”. See Emissions Unit 008.
2. SECTION II. FACILITY – WIDE CONDITIONS. Gulf Power request that the facility wide NOx Cap of 0.20 lb/mmBtu (when Unit 7 is on line) be added to this section. See Section A. 15.
3. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 8 of 45) A. 5. Selective Non-Catalytic Reduction (SNCR) System. Please correct condition as a Permit Note as noted in the original SNCR Construction Permits and Title V Permit. This information on the design and operation is for descriptive purposes only.
4. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 8 of 45) A. 6. Selective Catalytic Reduction (SCR) System. Please correct condition as a Permit Note similar to item 3 above. This information on the design and operation is for descriptive purposes only.
5. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 14 of 45). A. 29. Test Methods. Please add Method 7 with 7E – Determination of Nitrogen Oxide Emissions from Stationary Sources.
6. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 14 of 45). A. 33. Testing While Injecting Additives. Please revise condition to be consistent with the Smith Testing While Injecting Additives; i.e. “If supplemental additives are used greater than 50% of the time the unit(s) are operated, the owner or operator shall conduct all emissions tests while injecting additives consistent with normal operating practices approved by the Department”. In addition, Gulf Power request a “Permit Note” stating that this condition only applies to emissions tests in which the additive impacts the emissions; e.g. particulate tests.
7. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 15 of 45). A. 34. Visible Emissions. Please revise the “Permit Note:The transmissometers in use at this facility make a permanent recording every six-minutes based on an average of reading taken every 10 seconds.”
8. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 19 of 45). A. 51. Ambient Monitoring Requirement. Please delete Condition. Gulf Power no longer operates an ambient air monitoring network.
9. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 21 of 45). Subsection B. Emissions Unit -008 Description. Please correct the Unit Description to reflect “three” fly ash silo in lieu of “two”. Also revise the description of the number of vents in the “Permit Note” to one vent per silo and correct Silo A and B dimensions as approximately 3 feet by 4 feet. See item 10.
10. SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. (Page 21 of 45). B. 4. Visible Emissions. Please delete (2 on each baghouse) in regards to the number of vents in the condition due to recent changes.