

DeVore, Christy

From: Waters, G. Dwain [GDWATERS@southernco.com]
Sent: Thursday, February 25, 2010 4:18 PM
To: DeVore, Christy; Koerner, Jeff
Subject: Permit Items for Consideration

Just wanted to reiterate a few items on what Gulf is requesting in the HSC permit for your consideration as you draft the permit. Also, we would like to have a chance to review the pre-draft before it goes out of signature.

* CRIST 6 TURBINE SECTION similar to the Crist 7 Turbine Permit previously issued. See 0330045-027-AC

* PLANT CRIST SULFUR DIOXIDE EMISSIONS CAP PROPOSAL: Gulf Power is proposing to revise the current Crist SO₂ permit rate limit of 2.4 lb/mmBtu to a more stringent mass limit of 25,840 lb/hr for bypass scrubber operations. The proposed multi-unit (Unit 4,5,6,7) emissions cap is equivalent to a 2.1 SO₂ lb/mmBtu rate multiplied by permitted heat input capacity for Units 4,5,6 and 7. The proposed SO₂ cap will allow the facility more flexibility in fuel selection for scrubber and bypass operations. Gulf proposes to demonstrate compliance to the multi-unit emissions cap with stack continuous emission monitors on a 3 block hour basis. The proposed multi-unit mass SO₂ emissions cap will only be applicable to Crist FGD bypass operations. The Crist scrubber SO₂ limit of 886 tons/30 operational days will remain as outlined in the Crist FGD Air Construction Permit and will not be impacted by a fuel blend change for Plant Crist.

* PLANT CRIST SAM EMISSIONS CAP PROPOSAL: Gulf is proposing a multi-unit emissions cap at 165.5 tons/year for Units 4,5,6 and 7 to ensure the Unit 6 SCR, Unit 6 Turbine Upgrade or fuel blend change will not cause a significant net emissions increase. Gulf proposes to demonstrate reasonable assurance of compliance to the Crist multi-unit acid mist emissions cap by establishing a parametric model using FGD scrubber and hydrated lime injection rates to correlate the acid mist reduction efficiency. The preferred SAM test method is Method 8A or 8B.

G. Dwain Waters, Q.E.P.
Special Projects and Environmental Assets Coordinator Gulf Power Company One Energy Place
Pensacola, Florida 32520-0328
Phone: (850) 444-6080
Cell: (850) 336-6527
Fax: (850) 444-6217
gdwaters@southernco.com