

Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

Gulf Power - Crist
- general file -

October 28, 2002

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Ussery:

RE: Additional Time Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Crist Electric Generating Plant's Unit No. 6's Electrostatic Precipitator (ESP)
0330045-003-AC

The Department has reviewed the request that you provided on June 5, 2002; and, the request for additional time authorization received October 24, 2002. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Crist Electric Generating Plant's Unit No. 6's ESP (electrostatic precipitator) located in Pensacola, Escambia County. The purpose is to help the company address Compliance Assurance Monitoring (CAM), which will have to be addressed regarding the ESP upon renewal of their Title V Operation Permit. Paragraph 403.061(16), Florida Statutes (F.S.), authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide reasonable and practical regulatory controls consistent with public interest.

In accordance with the provisions of Paragraphs 403.061(16) and (18), F.S., and Rule 62-210.700(5), F.A.C., you are hereby authorized to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Electric Generating Plant's Unit No. 6's ESP. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions and opacity standards. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit No. 6's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), particulate matter, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also.

"More Protection, Less Process"

Printed on recycled paper.

Mr. Gene L. Ussery
Gulf Power Company
Crist Electric Generating Plant: Unit No. 6
0330045-003-AC
Page Two

The performance tests and parameter measurements or monitoring shall be subject to the following conditions:

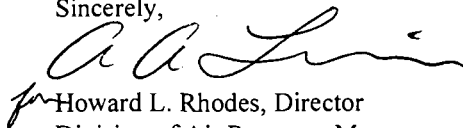
1. Unless waived, the permittee shall notify the Department's Northwest District Office and Bureau of Air Regulation Office at least 15 days prior to commencement of the performance tests and parameter measurements or monitoring. A written report shall be submitted to these offices within 45 days upon completion of the last test run and parameter measurements and monitoring.
2. The authorized testing and measurement and monitoring schedule is from October 28, 2002, through June 30, 2003. If additional time is needed, the permittee shall provide the Department with documentation of the progress accomplished to date and shall identify what is left to be done to complete the testing and measurements or monitoring.
3. The parameters to be measured or monitored are sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), particulate matter, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also.
4. Emissions testing shall be conducted concurrently for the following pollutants and using the following test methods:
 - a. Particulate matter EPA Test Method 17 (including EPA Test Methods 1 thru 4)
 - b. Visible emissions EPA Test Method 9
5. The performance test plans are as follows:
 1. Conduct a performance test (three 1-hour runs) using EPA Method 17 at "normal" operations;
 2. Conduct a performance test (three 1-hour runs) using EPA Method 17 at a reduction in the ESP efficiency; and,
 - 3.a. If the test results show that the PM allowable limit was exceeded; then the ESP's efficiency will be increased and a third performance test using EPA Method 17 will be conducted (supposedly between "normal" and "at the reduced efficiency"); or,
 - b. If the test results show that the PM allowable limit was not exceeded; then the ESP's efficiency will be further decreased and a third performance test using EPA Method 17 will be conducted in an attempt to define the outer range of the ESP's efficiency at which the PM allowable limit will be exceeded; and,
 - c. If the outer range is not established by the 2nd and 3rd performance tests, then the performance testing is ended for that emissions unit; and, Gulf Power Company will use the data to help define their CAM Plan for that emissions unit tested.
6. The release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C., is not authorized for this activity.
7. Performance testing shall immediately cease upon the occurrence of a valid environmental complaint by a citizen or other party, or a nuisance or danger to the public health or welfare. Performance testing shall not resume until appropriate measures to correct the problem have been implemented.

Mr. Gene L. Ussery
Gulf Power Company
Crist Electric Generating Plant: Unit No. 6
0330045-003-AC
Page Three

8. The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida.
9. This Department action is just to authorize the performance testing and parameter measurements and monitoring for the Crist Unit No. 6's ESP for the purpose of developing a CAM protocol.
10. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
11. The Department shall be notified in writing on the date of the last test run and parameter measurement and monitoring completion. If after work hours, notification shall occur on the next work day.
12. Attachment Section.
 - a. Mr. G. Dwain Waters's letter received June 5, 2002.
 - b. Final Determination.
 - c. Mr. G. Dwain Waters's letter received October 24, 2002.
 - d. Additional time authorization letter dated October 28, 2002.

The Department has relied on the information referenced in the Attachment Section and conversations with representatives of Gulf Power Company in authorizing this activity.

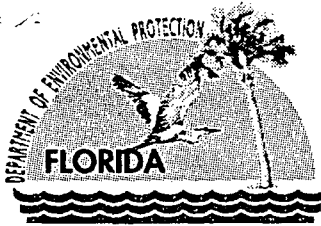
Sincerely,


for Howard L. Rhodes, Director
Division of Air Resource Management

HLR/rbm

Enclosures

cc: Scott Sheplak, DEP - BAR
Sandra Veazey, DEP - NWD
Kevin White, DEP - NWD
Joe Kahn, DEP - BAMMS
G. Dwain Waters, Q.E.P., GPC
Gregory N. Terry, P.E., GPC



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

October 28, 2002

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Ussery:

RE: Additional Time Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Lansing Smith Electric Generating Plant's Units Nos. 1 & 2's Electrostatic Precipitator (ESP) 0050014-004-AC

The Department has reviewed the request that you provided on June 5, 2002; and, the request for additional time authorization received October 24, 2002. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Lansing Smith Electric Generating Plant's Units Nos. 1 & 2's ESP (electrostatic precipitator) located in Lynn Haven, Bay County. The purpose is to help the company address Compliance Assurance Monitoring (CAM), which will have to be addressed regarding the ESP upon renewal of their Title V Operation Permit. Paragraph 403.061(16), Florida Statutes (F.S.), authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide reasonable and practical regulatory controls consistent with public interest.

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Mr. Gene L. Ussery
Gulf Power Company
Lansing Smith Electric Generating Plant: Units Nos. 1 & 2
0050014-004-AC
Page Two

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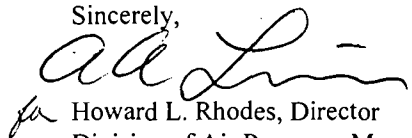
1. Unless waived, the permittee shall notify the Department's Northwest District Office, Northwest District Branch Office - Panama City, and Bureau of Air Regulation Office at least 15 days prior to commencement of the performance tests and parameter measurements or monitoring. A written report shall be submitted to these offices within 45 days upon completion of the last test run and parameter measurements and monitoring.
2. The authorized testing and measurement and monitoring schedule is from October 28, 2002, through June 30, 2003. If additional time is needed, the permittee shall provide the Department with documentation of the progress accomplished to date and shall identify what is left to be done to complete the testing and measurements or monitoring.
3. The parameters to be measured or monitored are sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), particulate matter, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also.
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Mr. Gene L. Ussery
Gulf Power Company
Lansing Smith Electric Generating Plant: Units Nos. 1 & 2
0050014-004-AC
Page Three

8. The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida.
9. This Department action is just to authorize the performance testing and parameter measurements and monitoring for the Lansing Smith Units Nos. 1 & 2's ESP for the purpose of developing a CAM protocol.
10. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
11. The Department shall be notified in writing on the date of the last test run and parameter measurement and monitoring completion. If after work hours, notification shall occur on the next work day.
12. Attachment Section.
 - a. Mr. G. Dwain Waters's letter received June 5, 2002.
 - b. Final Determination.
 - c. Mr. G. Dwain Waters's letter received October 24, 2002.
 - d. Additional time authorization letter dated October 28, 2002.

The Department has relied on the information referenced in the Attachment Section and conversations with representatives of Gulf Power Company in authorizing this activity.

Sincerely,


for Howard L. Rhodes, Director
Division of Air Resource Management

HLR/rbm

Enclosures

cc: Scott Sheplak, DEP - BAR
Sandra Veazey, DEP - NWD
Kevin White, DEP - NWD
Gary Shaffer, DEP - NWDB
Joe Kahn, DEP - BAMMS
G. Dwain Waters, Q.E.P., GPC
Gregory N. Terry, P.E., GPC

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

OCT 24 2002

DIVISION OF AIR
RESOURCES MANAGEMENT



Certified Mail

October 21, 2002

R. Bruce Mitchell
Title V Section – Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

RE: CRIST ELECTRIC GENERATING PLANT
AUTHORIZATION TO EXTEND CAM PROTOCOL TESTING
PERMIT No: 0330045-003-AC

Thanks again for meeting with Mike Markey and me last week regarding our continuing efforts to prepare protocols for Compliance Assurance Monitoring (CAM). As outlined in our meeting, Gulf Power is requesting the construction permit for conducting CAM testing at Plant Crist be extended until June 30, 2003. The main reason for the request is due to increased budgetary constraints facing Gulf Power in 2002. CAM test at Crist Units 4 & 5 were completed on schedule and their reports are being submitted to the Department later this month.

Attached is an authorization statement by Gene L. Ussery, Jr., the Responsible Official outlining his approval of this permit extension request.

If you have any questions or need further information regarding the test procedures or CAM protocol development for Plant Crist, please call me at (850) 444.6527.

Sincerely,

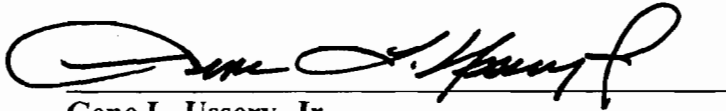
G. Dwain Waters, Q.E.P.
Air Quality Programs Supervisor

cc: w/att: Jim. Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Kevin Beaty, Gulf Power Company
Clark Mitchell, Southern Company Services
Gary Perko, HGSS
Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida

**CERTIFICATION BY RESPONSIBLE OFFICIAL
CRIST UNITS 4,5,6 COMPLIANCE ASSURANCE
MONITORING TEST PERMIT EXTENSION REQUEST**

“I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Crist Electric Generating Plant for which this permit extension is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this request are true, accurate and complete.”

Responsible Official Signature:

A handwritten signature in black ink, appearing to read "Gene L. Ussery, Jr.", written over a horizontal line.

**Gene L. Ussery, Jr.
Vice-President of Power Generation**

10-17-02
Date:

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

OCT 24 2002

DIVISION OF AIR
RESOURCES MANAGEMENT

Certified Mail



October 21, 2002

R. Bruce Mitchell
Title V Section – Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

RE: LANSING SMITH ELECTRIC GENERATING PLANT
AUTHORIZATION TO EXTEND CAM PROTOCOL TESTING
PERMIT No: 0050014-004-AC

Thanks again for meeting with Mike Markey and me last week regarding our continuing efforts to prepare protocols for Compliance Assurance Monitoring (CAM). As outlined in our meeting, Gulf Power is requesting the construction permit for conducting CAM testing at Plant Lansing Smith be extended until June 30, 2003. This request is pursuant to budgetary constraints facing Gulf Power in 2002 and due to the unexpected waterwall replacement project on Unit 2 permitted to begin in January, 2003. CAM testing will need to be conducted after the completion of this project.

Attached is an authorization statement by Gene L. Ussery, Jr., the Responsible Official outlining his approval of this permit extension request.

If you have any questions or need further information regarding the test procedures or CAM protocol development for Plant Lansing Smith, please call me at (850) 444.6527.

Sincerely,

A handwritten signature in black ink, appearing to read "Dwain Waters".

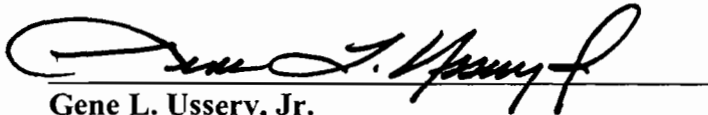
G. Dwain Waters, Q.E.P.
Air Quality Programs Supervisor

cc: w/att: Jim. Vick, Gulf Power Company
Trey Hall, Gulf Power Company
Marie Largilliere, Gulf Power Company
Kevin Beaty, Gulf Power Company
Clark Mitchell, Southern Company Services
Gary Perko, HGSS
Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida

**CERTIFICATION BY RESPONSIBLE OFFICIAL
LANSING SMITH UNITS 1 & 2 COMPLIANCE ASSURANCE
MONITORING TEST PERMIT EXTENSION REQUEST**

"I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Lansing Smith Electric Generating Plant for which this permit extension is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this request are true, accurate and complete."

Responsible Official Signature:



**Gene L. Ussery, Jr.
Vice-President of Power Generation**

10-17-02
Date:



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

July 26, 2002

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Ussery:

RE: Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Lansing Smith Electric Generating Plant's Units Nos. 1 & 2's Electrostatic Precipitator (ESP)
0050014-004-AC

The Department has reviewed the request that you provided on June 5, 2002. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Lansing Smith Electric Generating Plant's Units Nos. 1 & 2's ESP (electrostatic precipitator) located in Lynn Haven, Bay County. The purpose is to help the company address Compliance Assurance Monitoring (CAM), which will have to be addressed regarding the ESP upon renewal of their Title V Operation Permit. Paragraph 403.061(16), Florida Statutes (F.S.), authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide reasonable and practical regulatory controls consistent with public interest.

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Mr. Gene L. Ussery
Gulf Power Company
Lansing Smith Electric Generating Plant: Units Nos. 1 & 2
0050014-004-AC
Page Three

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 - b. Final Determination.

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Sincerely,



for Howard L. Rhodes, Director
Division of Air Resources Management

HLR/rbm

Enclosures

cc: Clair Fancy, DEP - BAR
Scott Sheplak, DEP - BAR
Sandra Veazey, DEP - NWD
Kevin White, DEP - NWD
Gary Shaffer, DEP - NWDB
Joe Kahn, DEP - BAMMS
G. Dwain Waters, Q.E.P., GPC
Gregory N. Terry, P.E., GPC

GULF POWER COMPANY
One Energy Place
Pensacola, FL 32520-0328

Fax Phone: 850.444.6217 -
Environmental Affairs

RECEIVED

JUL 18 2002

BUREAU OF AIR REGULATION

Fax

| | | | |
|---------------|---|---------------|--|
| To: | Bruce Mitchell FDEP Tallahassee, FL | From: | Dwain Waters Gulf Power Co. / Environmental Affairs |
| Fax: | 850-413-9198 | Pages: | 3 plus cover page |
| Phone: | 850-922-6979 | Date: | 07/18/02 |
| Re: | | | |

Urgent For Your Review Comment by _____

Please Reply Please Recycle

● **Comments:**

Please find attached public notice affidavit for
the Crist CAM Air Construction Permit. The original will be
mailed today to you. Please let me know if you
have any questions or concerns. Thanks, Dwain
(850-444-6527)

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111



Certified Mail

July 18, 2002

Mr. Bruce Mitchell
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

RE: CRIST ELECTRIC GENERATION FACILITY
DEP File No. 0330045-003-AC
Air Construction Permit for CAM - Public Notice Affidavit

Thanks for the quick response to Gulf Power's request for an air construction permit to conduct CAM testing at Plant Crist. Enclosed is the proof of publication, i.e., newspaper affidavit regarding the Public Notice of Intent to Issue An Air Construction Permit originally sent to Gene L. Ussery (Gulf Power) on June 25, 2002.

Please let me know if you have any questions regarding this matter and if you receive any public comments regarding our request.

Sincerely,

G. Dwain Waters, Q.E.P.
Air Quality Programs Supervisor

Cc: J. O. Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Sandra Veazey, FDEP, Northwest District
Kevin White, FDEP Northwest District

PENSACOLA News Journal

Informed. In Tune. In Touch.

BEST AVAILABLE COPY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENT

Draft Air Construction Permit No.:
Gulf Power Company
Crist Electric Generating
Escambia County

Published Daily-Pensacola, Escambia County, FL

STATE OF FLORIDA County of Escambia

Before the undersigned authority personally appeared Glenda Nail who is personally known to me and who on oath says that he/she is a representative of The Pensacola News Journal, a daily newspaper published in Pensacola in Escambia County, Florida; that the attached copy of advertisement, being a legal in the matter of Public Notice of Intent to Issue an Air Construction Permit was published in said newspaper in the issues of July 11, 2002. Affiant further says that the said Pensacola News Journal is a newspaper published in Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida each day and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and Affiant further says that he/she has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this 11th day of July A.D., 2002.

Bereth Ferguson
Bereth Ferguson
Notary Public

BERETH FERGUSON
Notary Public-State of FL
My Comm. Expires OCT. 10, 2005
Comm. No. DD048662

The Department of Environmental Protection (permit) to issue an air construction permit to Gulf Power Company's Crist Electric Generating Plant located in Pensacola, Escambia County, Florida. The permittee, Gulf Power Company, applied on conduct pollutant testing and parameter measurement Assurance Monitoring (CAM) protocol for Units Nos. 4, 5 & 6's ESP (electrostatic precipitator) at the Crist Electric Generating Plant in Pensacola, Escambia County, Florida. The permittee requests the Department of Environmental Protection to vary the collection efficiency of the ESPs. The data gathered will allow the calibration of the ESPs. The pollutants and parameters to be measured include sulfur dioxide (SO₂), particulate matter, carbon dioxide (CO₂), ash content, and other unit specific parameters that are needed. The permittee requests the Department of Environmental Protection to vary the collection efficiency of the ESPs. The data gathered will allow the calibration of the ESPs. The pollutants and parameters to be measured include sulfur dioxide (SO₂), particulate matter, carbon dioxide (CO₂), ash content, and other unit specific parameters that are needed. The permittee requests the Department of Environmental Protection to vary the collection efficiency of the ESPs. The data gathered will allow the calibration of the ESPs. The pollutants and parameters to be measured include sulfur dioxide (SO₂), particulate matter, carbon dioxide (CO₂), ash content, and other unit specific parameters that are needed.

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

The complete project file includes the Draft application/request, and the information submitted for confidential records under Section 403.11, F.S. Scott M. Sheplak, P.E., at the above address, for information.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Construction Permit No.: 0330046-003-AG
Gulf Power Company
Crist Electric Generating Plant
Escambia County

BEST AVAILABLE COPY

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit to Gulf Power Company for its Crist Electric Generating Plant located in Pensacola, Escambia County. The applicant's name and address are: Gene L. Usery, V.P. of Power Generation/Transmission, Gulf Power Company, One Energy Place, Pensacola, Florida 32520-0328.

The permittee, Gulf Power Company, applied on June 5, 2002, for authorization to conduct pollutant testing and parameter measurements for the development of a Compliance Assurance Monitoring (CAM) protocol for the Gulf Power Company's Crist Units Nos. 4, 5, & 6's ESP (electrostatic precipitator), which is located at the Crist Electric Generating Plant in Pensacola, Escambia County. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash reactivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions standard. The data gathered will allow the calibration of an EPRM (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Units Nos. 4, 5 & 6's ESP. The pollutants and/or parameters to be measured or monitored will include sulfur dioxide (SO₂), nitrogen dioxide (NO₂), nitrogen oxides (NOx), particulate matter, carbon dioxide (CO₂), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRM computer model. Particulate size distribution may be evaluated also. The development testing is scheduled to run from September 1 through November 30, 2002.

The permitting authority will issue the Air Construction Permit, and subsequent Final Air Construction Permit, in accordance with the conditions of the Draft Air Construction Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Draft Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

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, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9230; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.50(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.50(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen 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 applicable 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-108.205, Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- The name and address of each agency affected and each agency's file(s) or identification number(s), if known;
- The name, address and telephone number of the petitioner; 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 petitioner's substantial rights will be affected by the agency determination;
- A statement of how and when the petitioner received notice of the agency action or proposed action;
- A statement of all disputed issues of material fact. If there are none, the petitioner must so state;
- A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; and
- A demand for relief.

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 28-108.301, 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 notice of intent. 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.

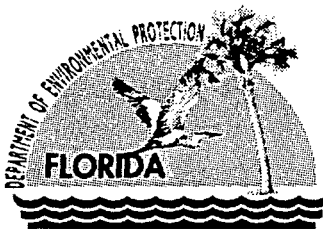
Mediation is not available for this proceeding.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Affected District Authority:
Department of Environmental Protection
Northwest District Office
Air Resources
160 Governmental Place
Pensacola, Florida 32520-0329
Telephone: 850/695-8300
Fax: 850/595-4417

The complete project file includes the Draft Air Construction Permit, the application/request, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532 for additional



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

July 12, 2002

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Ussery:

RE: Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Scholz Electric Generating Plant's Units Nos. 1 & 2's Electrostatic Precipitators (ESP)
0630014-002-AC

The Department has reviewed the request that you provided on June 5, 2002. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Scholz Electric Generating Plant's Units Nos. 1 & 2's ESP located in Sneads, Jackson County. The purpose is to help the company address Compliance Assurance Monitoring (CAM), which will have to be addressed regarding the ESP upon renewal of their Title V Operation Permit. Paragraph 403.061(16), Florida Statutes (F.S.), authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide reasonable and practical regulatory controls consistent with public interest.

In accordance with the provisions of Paragraphs 403.061(16) and (18), F.S., and Rule 62-210.700(5), F.A.C., you are hereby authorized to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Scholz Electric Generating Plant's Units Nos. 1 & 2's ESP. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions and opacity standards. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Scholz Units Nos. 1 & 2's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), particulate matter, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also.

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The performance tests and parameter measurements or monitoring shall be subject to the following conditions:

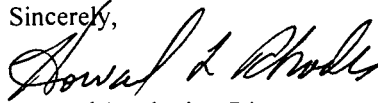
1. Unless waived, the permittee shall notify the Department's Northwest District Office, Northwest District Branch Office - Tallahassee, and Bureau of Air Regulation Office at least 15 days prior to commencement of the performance tests and parameter measurements or monitoring. A written report shall be submitted to these offices within 45 days upon completion of the last test run and parameter measurements and monitoring.
2. The authorized testing and measurement and monitoring schedule is from July 15 through September 30, 2002. If additional time is needed, the permittee shall provide the Department with documentation of the progress accomplished to date and shall identify what is left to be done to complete the testing and measurements or monitoring.
3. The parameters to be measured or monitored are sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), particulate matter, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also.
4. Emissions testing shall be conducted concurrently for the following pollutants and using the following test methods:
 - a. Particulate matter EPA Test Method 17 (including EPA Test Methods 1 thru 4)
 - b. Visible emissions EPA Test Method 9
5. The performance test plans are as follows:
 1. Conduct a performance test (three 1-hour runs) using EPA Method 17 at "normal" operations;
 2. Conduct a performance test (three 1-hour runs) using EPA Method 17 at a reduction in the ESP efficiency; and,
 - 3.a. If the test results show that the PM allowable limit was exceeded; then the ESP's efficiency will be increased and a third performance test using EPA Method 17 will be conducted (supposedly between "normal" and "at the reduced efficiency"); or,
 - b. If the test results show that the PM allowable limit was not exceeded; then the ESP's efficiency will be further decreased and a third performance test using EPA Method 17 will be conducted in an attempt to define the outer range of the ESP's efficiency at which the PM allowable limit will be exceeded; and,
 - c. If the outer range is not established by the 2nd and 3rd performance tests, then the performance testing is ended for that emissions unit; and, Gulf Power Company will use the data to help define their CAM Plan for that emissions unit tested.
6. The release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C., is not authorized for this activity.
7. Performance testing shall immediately cease upon the occurrence of a valid environmental complaint by a citizen or other party, or a nuisance or danger to the public health or welfare. Performance testing shall not resume until appropriate measures to correct the problem have been implemented.

Mr. Gene L. Ussery
Gulf Power Company
Scholz Electric Generating Plant: Units Nos. 1 & 2
0630014-002-AC
Page Three

8. The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida.
9. This Department action is just to authorize the performance testing and parameter measurements and monitoring for the Scholz Units Nos. 1 & 2's ESP for the purpose of developing a CAM protocol.
10. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
11. The Department shall be notified in writing on the date of the last test run and parameter measurement and monitoring completion. If after work hours, notification shall occur on the next work day.
12. Attachment Section.
 - a. Mr. G. Dwain Waters's letter received June 5, 2002.
 - b. Final Determination.

The Department has relied on the information referenced in the Attachment Section and conversations with representatives of Gulf Power Company in authorizing this activity.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resource Management

HLR/rbm

Enclosures

cc: Clair Fancy, DEP - BAR
Scott Sheplak, DEP - BAR
Sandra Veazey, DEP - NWD
Kevin White, DEP - NWD
Gerry Neubauer, DEP - NWDB
Joe Kahn, DEP - BAMMS
G. Dwain Waters, Q.E.P., GPC
Gregory N. Terry, P.E., GPC

FINAL DETERMINATION

Gulf Power Company

Scholz Electric Generating Plant

Project No.: 0630014-002-AC

I. Public Notice and Comments.

The Public Notice of the permitting project was published in the News Herald on June 28, 2002. On July 2nd, an e-mail message from Mr. Dwain Waters, with Gulf Power Company, was received during the commenting period (14-days) that concluded at the close of business of July 11, 2002. The request was to delete the requirement imposed on the P.E. of record for oversight of the overall testing project. The request was denied through an e-mail explanation on July 2nd and, therefore, no changes will be made to the Draft authorization letter.

II. Conclusion.

It is recommended to issue the authorization letter as noticed.

FINAL DETERMINATION

Gulf Power Company

Lansing Smith Electric Generating Plant

Project No.: 0050014-004-AC

I. Public Notice and Comments.

The Public Notice of the permitting project was published in the News Herald on July 11, 2002. No comments were received during the Public Notice period (14-days), which concluded at the close of business of July 25, 2002.

II. Conclusion.

It is recommended to issue the authorization letter as noticed.

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

JUL 22 2002

BUREAU OF AIR REGULATION
Certified Mail



July 15, 2002

Mr. Bruce Mitchell
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

RE: LANSING SMITH ELECTRIC GENERATION FACILITY
DEP File No. 0050014-004-AC
Air Construction Permit for CAM - Public Notice Affidavit

Thanks for the quick response to Gulf Power's request for an air construction permit to conduct CAM testing at Plant Smith. Enclosed is the proof of publication, i.e., newspaper affidavit regarding the Public Notice of Intent to Issue An Air Construction Permit originally sent to Gene L. Ussery (Gulf Power) on June 25, 2002.

Please let me know if you have any questions regarding this matter and if you receive any public comments regarding our request.

Sincerely,

A handwritten signature in black ink that reads "G. Dwain Waters Q.E.P.".

G. Dwain Waters, Q.E.P.
Air Quality Programs Supervisor

Cc: J. O. Vick, Gulf Power Company
Mike Sarab, Gulf Power Company
Trey Hall, Gulf Power Company
Marie Largilliere, Gulf Power Company
Sandra Veazey, FDEP, Northwest District
Kevin White, FDEP Northwest District


Florida Freedom Newspapers, Inc.

PUBLISHERS OF THE NEWS HERALD
Panama City, Bay County, Florida
Published Daily

State of Florida County of Bay

Before the undersigned authority appeared _____
Pam Gregory, who on oath says that (s)he
is Advertising Director of the News Herald, a daily
newspaper published at Panama City, in Bay County, Florida; that the attached copy
of advertisement, being a Legal Advertisement
in the matter of Public Notice
Lansing Smith
in the Bay County
Court, was published in said newspaper in the issues of _____
July 11, 2002

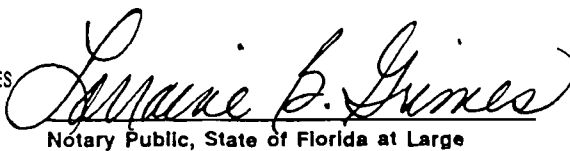
Affiant further says that the News Herald is a direct successor of the Panama City News and that this publication, together with its direct predecessor, has been continuously published in said Bay County, Florida, each day (except that the predecessor, Panama City News, was not published on Sundays), and that this publication together with its said predecessor, has been entered as a second class mail matter at the post office in Panama City in said Bay County, Florida, for a period of one year next preceding the first publication of the attached copy of the advertisement, all in accordance with the provisions of section 49.03, Florida Statutes; and affiant further says that (s)he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



State of Florida
County of Bay
Sworn to and subscribed before me this 11th day of July,
A. D., 2002 by Pam Gregory, Advertising Director of The
News Herald, who is personally known to me or has produced N/A
as identification.



Lorraine B. Grimes
MY COMMISSION # CC931149 EXPIRES
August 25, 2004
BONDED THRU TROY FAIN INSURANCE, INC.



Notary Public, State of Florida at Large

2279
PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Construction Permit No.: 0050014-004-AC
Gulf Power Company
Lansing Smith Electric Generating Plant
Bay County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit to Gulf Power Company for its Lansing Smith Electric Generating Plant located in Lynn Haven, Bay County. The applicant's name and address are: Gene L. Ussey, V.P. of Power Generation/Transmission, Gulf Power Company, One Energy Place, Pensacola, Florida 32520-0328.

The permittee, Gulf Power Company, applied on June 5, 2002, for authorization to conduct pollutant testing and parameter measurements for the development of a Compliance Assurance Monitoring (CAM) protocol for the Gulf Power Company's Lansing Smith Units Nos. 1 & 2's ESP (electrostatic precipitator), which is located at the Lansing Smith Electric Generating Plant in Lynn Haven, Bay County. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions standard. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Lansing Smith Units Nos. 1 & 2's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide (CEM (continuous emission monitor)), nitrogen oxides (CEM), particulate matter, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also. The development testing is scheduled to run from September 1 through November 30, 2002.

The permitting authority will issue the Air Construction Permit, and subsequent Final Air Construction Permit.

September 30, 2002.

The permitting authority will issue the Air Construction Permit, and subsequent Final Air Construction Permit, in accordance with the conditions of the Draft Air Construction Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Draft Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

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, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, 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 fourteen 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 applicable 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 will be only at the approval of the presiding officer upon the

a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, Florida Administrative Code (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(s) or identification number(s), if known;
- (b) The name, address and telephone number of the petitioner; 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 petitioner's substantial rights will be affected by the agency determination;
- (c) A statement of how and when the petitioner received notice of the agency action or proposed action;
- (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, as well as the rules and statutes which entitle petitioner to relief; and
- (f) A demand for relief.

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 notice of intent. 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 is not available for this proceeding.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:
Department of
Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive,
Suite 4
Tallahassee, Florida
32301
Telephone: 850/488-0114
Fax: 850/922-6979

Affected District Office

Fax: 850/922-6979

Affected District Office
Authority:
Department of
Environmental Protection
Northwest District Office
Air Resources
160 Governmental Place
Pensacola, Florida
32520-0328
Telephone: 850/595-8300
Fax: 850/595-4417

Affected District Branch
Office Authority:
Department of
Environmental Protection
Northwest District Branch
Office
2353 Jenks Avenue
Panama City, Florida
32405
Telephone: 850/872-4375
Fax: 850/872-7790

The complete project file includes the Draft Air Construction Permit, the application/request, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532 for additional information.
July 11, 2002

FINAL DETERMINATION

Gulf Power Company

Crist Electric Generating Plant

Project No.: 0330045-003-AC

I. Public Notice and Comments.

The Public Notice of the permitting project was published in the Pensacola News Herald on July 11, 2002. No comments were received during the Public Notice period (14-days), which concluded at the close of business of July 25, 2002.

II. Conclusion.

It is recommended to issue the authorization letter as noticed.



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

April 10, 2001

CERTIFIED MAIL – Return Receipt Requested

Mr. Robert G. Moore
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Moore:

RE: Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's Electrostatic Precipitator (ESP)

The Department has reviewed the request that you provided on March 8, 2001. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Crist Electrical Generating Plant's Unit #7's ESP (electrostatic precipitator) located in Pensacola, Escambia County. The purpose is to help the company address Compliance Assurance Monitoring (CAM), which will have to be addressed regarding the ESP upon renewal of their Title V Operation Permit. Paragraph 403.061(16), Florida Statutes (F.S.), authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide reasonable and practical regulatory controls consistent with public interest.

In accordance with the provisions of Paragraphs 403.061(16) and (18), F.S., and Rule 62-210.700(5), F.A.C., you are hereby authorized to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's ESP. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions and opacity standards. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit #7's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, visible emissions, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load,

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Mr. Robert G. Moore
Gulf Power Company
Crist Electric Generating Plant: Unit #7
Page Two

fuel flow, excess air and flue gas temperature, and other unit specific parameters that are needed for the computer model.

The performance tests and parameter measurements or monitoring shall be subject to the following conditions:

1. Unless waived, the permittee shall notify the Department's Northwest District office and the Bureau of Air Regulation at least 15 days prior to commencement of the performance tests and parameter measurements or monitoring. A written report shall be submitted to these offices within 45 days upon completion of the last test run and parameter measurements and monitoring.
2. The authorized testing and measurement and monitoring schedule is from April 14 to May 4, 2001. If additional time is needed, the permittee shall provide the Department with documentation of the progress accomplished to date and shall identify what is left to be done to complete the testing and measurements or monitoring.
3. The parameters to be measured or monitored are sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), carbon dioxide (CEM), particulate size distribution, ash content of the fuel, ultimate fuel analyses, load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model.
4. Emissions testing shall be conducted for the following pollutants and using the following test methods:
 - a. Particulate matter EPA Test Method 17 (including EPA Test Methods 1 thru 4)
 - b. Visible emissions EPA Test Method 9
5. The release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C., is not authorized for this activity.
6. Performance testing shall immediately cease upon the occurrence of a valid environmental complaint by a citizen or other party, or a nuisance or danger to the public health or welfare. Performance testing shall not resume until appropriate measures to correct the problem have been implemented.
7. The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida.
8. This Department action is just to authorize the performance testing and parameter measurements and monitoring for the Crist Unit #7's ESP for the purpose of developing a CAM protocol.
9. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
10. The Department shall be notified in writing on the date of the last test run and parameter measurement and monitoring completion. If after work hours, notification shall occur on the next work day.

Mr. Robert G. Moore
Gulf Power Company
Crist Electric Generating Plant: Unit #7
Page Three

11. Attachment Section.

- a. Mr. G. Dwain Waters's letter received March 8, 2001.
- b. Final Determination.

The Department has relied on the information referenced in the Attachment Section and conversations with representatives of Gulf Power Company in authorizing this activity.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources Management

HLR/rbm

Enclosures

cc: Clair Fancy, DEP - BAR
Scott Sheplak, DEP - BAR
Sandra Veazey, DEP - NWD
Andy Allen, DEP - NWD
Joe Kahn, DEP - BAMMS
G. Dwain Waters, Q.E.P., GPC

FINAL DETERMINATION

Gulf Power Company

Project No.: 0330045-002-AC

I. Public Notice and Comments.

The Public Notice of the permitting project was published in the Pensacola News Journal on March 20, 2001. There were no written comments received in the commenting period (14-days), which concluded at the close of business of April 2nd. However, on March 19th, Mr. Dwain Waters, with Gulf Power Company, phoned Mr. Bruce Mitchell and provided the following comments on the draft authorization letter:

1. On the 1st page, 2nd paragraph, 6th line, insert "and opacity" after "...particulate matter emissions" and make "standard" plural; and, it will read as:

.....particulate matter emissions and opacity standards.

2. On the 2nd page, condition No. 1 requires a notification of 15 days, which would conflict with the proposed date of April 16th. Therefore, "Unless waived," will be placed at the beginning of the condition as follows:

1. Unless waived, the permittee shall notify.....

3. On the 2nd page, condition No. 10, add a statement to the end on the condition to cover a situation where the testing ends after business hours. Therefore, the following sentence will be added to the end of the condition:

If after work hours, notification shall occur on the next work day.

II. Conclusion.

The changes requested were acceptable and did not significantly change the permitting action. Therefore, it is recommended to issue the authorization letter with the above changes made.



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

February 14, 2001

Mr. Dwayne Waters
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Waters:

RE: Guidance for Authorization to Conduct Potential Testing/Measurements for CAM

I have provided some excerpts of documents from some previous permitting activities where authorization to conduct some testing was pursued by Florida Crushed Stone Company. Included are the request, the Intent package, and the authorization letter. As for the request, it seems appropriate that you would provide a cover letter outlining your intent, referring to Section 403.061(18), Florida Statutes, as the suggested route that the Department might use to authorize some testing and/or measurements for CAM. Also, the request should contain the equipment [emissions unit(s)] involved, a finite timeframe (beginning and ending dates) needed to conduct any testing and/or measurements, the pollutants to be pursued, the parameters to be measured, and the specific test method(s) that you would like to perform and/or the equipment that will be used to make measurements. If we needed additional clarification or information, we would forward a request to you. Since you have already received your initial Title V Operation Permit, there would be no processing fee required.

Once we have received an acceptable request, an Intent package would be sent to you providing you with a Public Notice for publication in the newspaper of general circulation. Once through this activity satisfactorily, an authorization would be issued to you to allow you to conduct your testing and/or measurements. After conducting the testing and/or measurements, the data shall be made available to the Department.

I hope that the information provided will be helpful to you in preparing a request to us for authorization to conduct tests and/or measurements for CAM. If not, please give me a call at 850/921-9506.

Sincerely,

R. Bruce Mitchell
Environmental Administrator
Title V Section - Bureau of Air Regulation

RBM/m

Enclosures

cc: C. H. Fancy, BAR
Scott Sheplak, BAR
Sandra Veazey, NWD
Andy Allen, NWD

"More Protection, Less Process"

Printed on recycled paper.

Charles D. McCrary
Chief Production Officer
President -
Southern Company Generation

600 North 18th Street / 15N-8170
Post Office Box 2641
Birmingham, Alabama 35291

Scott

Tel 205.257.2243
Fax 205.257.5019

RECEIVED

NOV 24 1999

November 23, 1999

BUREAU OF AIR REGULATION



Energy to Serve Your World™

Mr. Clair H. Fancy, P.E.
Chief, Bureau of Air Regulation
Air Resources Management Division
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399 - 2400

Dear Mr. Fancy:

This letter is provided in accordance with the requirements outlined in Section IV Acid Rain Part and Appendix CP.-1 of the Crist Electric Generating Plant, Scholz Electric Generating Plant, and the Lansing Smith Electric Generating Plant Title V permits. On December 8, 1997, Southern Company submitted a Phase II NOx Averaging Plan to the States of Alabama, Florida, Georgia, and Mississippi and to Jefferson County, Alabama, with copies to the U.S. Environmental Protection Agency at Region IV and the Acid Rain Division. The plan was updated on April 15, 1999, from 71 to 75 units operated by Southern Company across the four state region. Following several comments from EPA Region IV and a few administrative changes, the plan was signed and resubmitted on July 23, 1999.

The initial Southern Company NOx averaging plan has been approved by the Alabama Department of Environmental Management, Georgia Environmental Protection Division, Mississippi Department of Environmental Quality, and the Jefferson County, Alabama, Department of Health. In conjunction with final approval of the averaging plan, the agencies have or are in the process of updating permits for these units per the November 18, 1999, letter to you from Mr. R. Douglas Neeley, U.S. Environmental Protection Agency.

This certification is based on information and belief formed after reasonable inquiry. To the best of my knowledge, the statements and information in this document are true, accurate, and complete as required by 62-213.420 (4) F.A.C.

If you have questions about the plan or the status of approval, please contact Mr. Danny Herrin, Manager, Clean Air Compliance, Southern Company Generation, at (205) 257-6468.

Sincerely,

Charles D. McCrary

cc: Ronald W. Gore, Alabama Department of Environmental Management
Ronald C. Methier, Georgia Environmental Protection Division
Dwight Wylie, Mississippi Department of Environmental Quality
James I. Carroll, Jefferson County Department of Health
R. Doug Neeley, U.S. Environmental Protection Agency
Robert Miller, U.S. Environmental Protection Agency



SCOTT, FYI

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 4
 ATLANTA FEDERAL CENTER
 61 FORSYTH STREET
 ATLANTA, GEORGIA 30303-8960

copy: D. Waters - Gulf
 J. Hunter - TSCO
 11/24 E. Middelmeier - NW dist
 B. Thomas - SW dist
 J. Campbell - HCEPC
 P. Comer - OGC
 H. Rhodes - VARMA

NOV 17 1999

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NOV 22 1999

4APT-ARB

Mr. Clair H. Fancy, P.E.
 Chief
 Bureau of Air Regulation
 Air Resources Management Division
 Florida Department of Environmental
 Protection
 Mail Station 5500
 2600 Blair Stone Road
 Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

Dear Mr. Fancy:

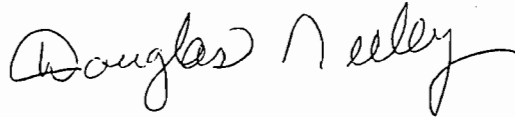
This letter is to follow up on our recent conversation regarding the approval process for the multi-state Phase II Acid Rain NOx Averaging Plan submitted by participating Southern Company plants to their respective State permitting authorities. Our conversation focused on the status of the proposed averaging plan, should the process of approval through the issuance of permits incorporating the plan not be completed by all the relevant permitting authorities by the Phase II effective date of January 1, 2000.

It is our understanding that the Florida Department of Environmental Protection (FDEP) has set a goal to complete the title V permitting process (i.e., finalize the title V permits) for the Gulf Power plants participating in the Southern Company Phase II NOx Averaging Plan by the end of this year. There remains the possibility, however, due to title V permitting delays that the FDEP may not approve Southern Company's plan and incorporate the plan into final title V permits by the end of this year.

The Acid Rain Division of the Environmental Protection Agency (EPA) considers a compliance plan submitted with an Acid Rain permit application to be part of the Acid Rain permit application (see 40 CFR 72.31(c)). This would include a Phase II NOx Averaging Plan; however, it would not include a petition for an alternative emission limitation period, a final alternative emission limitation or a renewal of a final alternative emission limitation. Therefore, the permit application shield provided in the Acid Rain regulations extends to a Phase II NOx Averaging Plan that is timely and complete (see 40 CFR 72.32(b)). Further, a complete Phase II NOx Averaging Plan is binding on the owners and operators until issuance or denial of the Acid Rain permit (see 40 CFR 72.32(c)). Under these rule provisions the units included in the Southern Company Phase II NOx Averaging Plan are required to operate in accordance with the terms of the averaging plan until the final approval of the plan (i.e., when all permitting authorities with jurisdiction over the units in the plan have approved the plan) (see 40 CFR 72.40(b)(2)).

If you have any questions or concerns regarding this matter, please contact Jenny Jachim of the EPA Region 4 staff at (404) 562-9126.

Sincerely,

A handwritten signature in cursive script that reads "Douglas Neeley". The signature is written in black ink and is positioned above the typed name.

R. Douglas Neeley
Chief
Air & Radiation Technology Branch
Air, Pesticides and Toxics
Management Branch

cc: W. Danny Herrin, Southern Company Services, Inc.
Ronald W. Gore, Alabama Department of Environmental Management
Ronald C. Methier, Environmental Protection Division
James L. Carroll, Jefferson County Department of Health
Dwight Alpern, Acid Rain Division
Robert Miller, Acid Rain Division

Appendix H-1, Permit History/ID Number Changes

Gulf Power Company
Crist

[DRAFT/PROPOSED/FINAL]Permit No.: 0330045-001-AV
Facility ID No.: 0330045

Permit History (for tracking purposes):

| <u>E.U. ID No</u> | <u>Description</u> | <u>Permit No.</u> | <u>Issue Date</u> | <u>Expiration Date</u> | <u>Extended Date</u> | <u>Revised Date(s)</u> |
|-----------------------|------------------------------------|-------------------|-----------------------|----------------------------|----------------------|------------------------|
| -001 | Crist Unit #1 | AO17-249656 | 5/19/94 | 1/15/96 | 8/14/96 | |
| -002 | Crist Unit #2 | AO17-249656 | 5/19/94 | 1/15/96 | 8/14/96 | |
| -003 | Crist Unit #3 | AO17-249656 | 5/19/94 | 1/15/96 | 8/14/96 | |
| -004 | Crist Unit #4 (Elec. Precipitator) | AO17-211303 | 4/17/92 | 4/1/97 | | |
| -005 | Power Boiler No. 5 | AO17-211303 | 4/17/92 | 4/1/97 | | |
| -006 | Power Boiler No. 6 | AO17-171809 | 6/6/90 | 9/2/95 | 8/14/96 | |
| -007 | Crist No. 7 | AO17-171806 | 6/6/90 | 9/2/95 | 8/14/96 | |
| -008 | Two Fly Ash Storage Silos | AO17-234356 | 7/30/93 | 7/1/98 | | |

(if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.: 10PEN17004506

To: Facility ID No.: 0330045



Lawton Chiles
Governor

Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

MAILED
MAY 22 1994
Virginia B. Wetherell
Secretary

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996
County: Escambia
Latitude/Longitude: 33°32'58"N/87°13'44"W
Project: Crist Boilers 1, 2, 3

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of Boilers 1, 2, and 3 with maximum rated heat inputs of 320, 320, and 550 MMBtu/hour, respectively. These boilers are primarily fueled with natural gas, with fuel oil as a standby fuel. Emissions are generally controlled by proper combustion; when operating with fuel oil, SO₂ emissions are controlled by the sulfur content of the fuel oil.

Operation of this source shall be consistent with the operation permit application dated April 15, 1994.

Located at the Crist Plant, Governor's Bayou, north of Pensacola.

Specific Condition No. 2 establishes maximum allowable operating and testing rates.

Specific Condition No. 6 establishes emission limits.

Specific Condition No. 7 establishes compliance testing requirements.

Specific Condition No. 9 requires submission of an annual operation report.

Specific Condition No. 10 requires submission of a Major Air Pollution Source Annual Operation Fee Form.

Specific Condition No. 11 requires submission of a Title V renewal application.

Carol Melton

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996

SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit. (FAC Rule 17-4.160)

Operation

2. The maximum allowable operating rates are 320, 320, and 550 MMBtu heat input per hour for Boiler 1, 2, and 3, respectively. These are the operating rates at which compliance with standards shall be demonstrated. Testing of emissions shall be conducted with the sources operating at capacity. Capacity is defined as 90 to 100% of rated capacity. If it is impracticable to test at capacity, then sources may be tested at less than capacity; if the sources are tested at less than capacity, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once a unit is so limited, then operation at higher capacity is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. (FAC Rule 17-4.070)
3. The maximum hours of operation are 24 hours/day, 7 days/week, and 52 weeks/year. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually. (Application dated April 15, 1994)
4. The maximum sulfur content of the back up fuel oil is limited to that percentage necessary to meet the SO₂ emission limit of 1.98 lbs/MMBtu heat input. The Permittee shall maintain a log available for Department inspection of the fuel oil sulfur content. (FAC Rule 17-4.070)
5. Satisfactory ladders, platforms, and other safety devices as well as necessary parts shall be provided, maintained, and made available as necessary to facilitate compliance inspections. (FAC Rule 17-297.345)

Emissions

6. The maximum allowable emission limit for each pollutant is as follows:

| Pollutant | FAC Rule | Allowable Emissions |
|-----------------|------------|---------------------------|
| VE | 17-296.405 | 20% opacity* |
| PM | 17-296.405 | 0.1 lb/MMBtu heat input |
| SO ₂ | 17-296.405 | 1.98 lbs/MMBtu heat input |

* except for one two-minute period/hour of up to 40% percent opacity

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996

SPECIFIC CONDITIONS:

Testing

7. Emissions tests for the following pollutants shall be performed between October 1 and November 30, in accordance with the test methods and frequency indicated, with notification to the Department 15 days prior to testing. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. For good cause, the Permittee may request an extension of a compliance test due date. However, inadequate planning of testing does not constitute good cause for an extension of the compliance test due date. The test report documentation must be submitted to the Department within 45 days after completion of testing.

| <u>Pollutant</u> | <u>Frequency</u> | <u>Test Method</u> | <u>Reference</u> |
|------------------|--|--------------------|---------------------|
| VE | annually | DEP No. 9 | FAC Rule 17-296.405 |
| | annually during excess emissions when applicable | DEP No. 9 | |
| PM | annually | EPA No. 5 | FAC Rule 17-296.405 |
| | annually during excess emissions when applicable | EPA No. 5 | FAC Rule 17-296.405 |

No particulate emissions test is required in any year during which the specific source did not burn fuel oil for more than 400 hours other than during startup.

The VE test shall be for a duration of sixty minutes and shall be conducted during one of the P.M. test runs if a P.M. test is conducted. Test reports shall comply with F.A.C. Rule 17-297.570, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 17-297.340(2).

Administrative

8. Boilers 1, 2, 3, 4 and 5 use a common stack. Visible emissions violations from this stack shall be attributed to all boilers unless the opacity meter results identify the specific boiler causing the excess visible emissions.

9. An annual operation report [DEP Form 17-210.900(4) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the Permittee and used for future annual submittals. (FAC Rule 17-210.370)

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996

SPECIFIC CONDITIONS:

10. In accordance with F.A.C. Rule 17-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 17-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the Permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

11. An application to renew this permit shall be submitted as required for a Title V permit. (FAC Rule 17-210)

12. The permanent source identification numbers for these point sources are:

- 10PEN17004501 - Boiler 1
- 10PEN16004502 - Boiler 2
- 10PEN17004503 - Boiler 3

Please cite these numbers on all test reports and other correspondence specific to these permitted point sources. (FAC Rule 17-297.570)

13. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, use telephone number (904) 444-8300 during normal working hours. (FAC Rule 17-210.700)

Expiration Date:

January 15, 1996

Issued this 19th day of May, 1994.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794 • 904-436-8300

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Robert Knegei, Deputy Assistant Secretary

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004501, 02 & 03
Permit/Certification Number: A017-166928
Date of Issue: July 21, 1989
Date of Modification: AUG 09 1989

Expiration Date: July 1, 1994
County: Escambia
Latitude/Longitude: 33°32'58"N/87°13'44"W
Section/Township/Range: 25/1N/30W
Project: Crist Boilers #1, #2 & #3

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of Boilers #1, #2 and #3. Fueled with natural gas, with #6 fuel oil as a standby fuel. Maximum heat input to each boiler is 320, 320 and 550 million Btu/hour respectively. Particulate emissions are controlled by proper combustion. Sulfur dioxide emissions are controlled by sulfur content of fuel. Natural gas is the primary fuel yielding negligible particulate and SO₂ emissions. When using standby oil the SO₂ emissions are limited to 1.88 pounds per million Btu of heat input.

These boilers emit through a 450 feet high stack used in common with boilers #4 and #5.

Located: Crist Plant, Governor's Bayou, north of Pensacola.

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004501, 02 & 03
Permit/Certification Number: A017-166928
Date of Issue: July 21, 1989
Date of Modification: AUG 09 1989

Expiration Date: July 1, 1994

GENERAL CONDITIONS:

14. 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 the 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.

SPECIFIC CONDITIONS:

15. The maximum allowable heat input is 320, 320 and 550 million Btu per hour to Boilers #1, #2 and #3 respectively. This is the heat input at which compliance with standards shall be demonstrated.

16. Particulates emissions shall be no greater than 0.1 pounds per million BTU of heat input. Sulfur oxide emissions shall be no greater than 1.88 pounds per million BTU of heat input. Visible emissions shall not be greater than 20% opacity except that 40% opacity shall be permissible for not more than two minutes in any one hour.

17. Particulates tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with EPA Methods 1, 2, 3, 5 or 17. Such tests shall be conducted once per year before the end of March. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.

18. Stack testing (Condition 17) shall be waived for any boiler that, in the prior federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.

19. Boilers #1, #2, #3, #4 and #5 used a common stack. Visible emission violations from this stack shall be attributed to all boilers unless opacity meter results show the specific boiler causing the violation.

20. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.

21. An application to renew this permit shall be submitted prior to May 1, 1994.

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004501, 02 & 03
Permit/Certification Number: A017-166928
Date of Issue: July 21, 1989
Date of Modification: AUG 09 1989

Expiration Date: July 1, 1994

SPECIFIC CONDITIONS:

22. The permanent source identification numbers for these permitted point sources are:

| | |
|---------------|-----------------|
| 10PEN17004501 | Crist Boiler #1 |
| 10PEN17004502 | Crist Boiler #2 |
| 10PEN17004503 | Crist Boiler #3 |

Please cite this number on all test reports and other correspondence specific to a point source.


Expiration date:

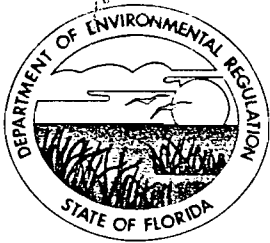
Issued July 21, 1989.

July 1, 1994

Modified this 9th day of August, 1989.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


ROBERT V. KRIEGEL
Deputy Assistant Secretary



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794

Lawton Chiles, Governor

Carol M. Browner, Secretary

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APR 12 1996

BUREAU OF
AIR REGULATION

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004504 and 05
Permit/Certification Number: A017-211303
Date of Issue: April 17, 1992

Expiration Date: April 1, 1997
County: Escambia
Latitude/Longitude: 30°33'57"N/87°13'29.5"W
Section/Township/Range: 25/1N/30W
Project: Crist Units No. 4 and No. 5
Coal Fired Boilers

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of Crist Units No. 4 and No. 5, both coal fired boilers, generating 91 megawatts of electricity each. Particulate emissions from each Unit are controlled by hot side electrostatic precipitators manufactured by Buell Model BAL .2X34N333-4-3P followed by cold side electrostatic precipitators manufactured by Buell Model 1.1X48K33-1P. Sulfur dioxide emissions are controlled by the sulfur content of the coal used as fuel. Sulfur dioxide, nitrogen dioxide, oxygen and opacity are monitored by continuous emission monitors on each Unit.

Located at the east end of Pate Road, off Ten Mile Road, two miles east of State Road 292, north of Pensacola.

Specific Condition No. 7 requires logging excess emissions.
Specific Condition No. 8 requires keeping a maintenance log.
Specific Condition No. 9 requires submitting quarterly excess emissions reports.
Specific Condition No. 11 requires annual particulate emissions tests due before the end of September.
Specific Condition No. 12 requires maintenance of a QC program.
Specific Condition No. 14 requires reporting of excess emissions as soon as possible.
Specific Condition No. 15 requires actions taken upon particulate test failures.
Specific Condition No. 18 requires submittal of permit renewal application by February 1, 1997.

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004504 and 05

Permit/Certification Number: A017-211303

Date of Issue: April 17, 1992

Expiration Date: April 1, 1997

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. The maximum allowable heat inputs are those heat inputs necessary to maintain electrical load output at 110% of the level at which the most recent successful particulate emissions compliance test was conducted for each unit. If the test was conducted at less than 90% of rated capacity of the unit, permittee may operate the unit at loads up to the rated capacity (91 megawatts for each unit) for purposes of preparation for testing for up to ten calendar days. The Department shall be advised in writing prior to each testing.
3. Particulate emissions shall not exceed 0.1 pounds per million Btu heat input.
4. Sulfur dioxide emissions shall not exceed 5.90 pounds per million Btu heat input.
5. Visible emissions shall not exceed 40% opacity.
6. Excess emissions are defined as:
 - A. Any six-minute average for opacity which exceeds the standard.
 - B. Any 24-hour average for sulfur dioxide which exceeds the standard.
7. A log shall be maintained showing the:
 - A. Duration of excess visible emissions and their causes.
 - B. Duration of excess SO₂ emissions.
8. A maintenance log of the continuous monitoring system shall be kept showing:
 - A. Time out of service.
 - B. Calibrations and adjustments.
9. A quarterly report of excess emissions shall be submitted within 30 days following the end of each calendar quarter. The report shall consist of each individual exceedance of opacity or SO₂ emissions (Specific Conditions 6 and 7) with duration, magnitude and cause. Any exceedance that is beyond the allowances of FAC Rule 17-2.250 shall be highlighted with note indicating compliance with Specific Condition 14 below.
10. Units 4 and 5 use a common stack (along with Units 1, 2 and 3). Visible emission violations from this stack shall be attributed to both Units unless opacity meter results show the specific Unit causing the violation.

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004504 and 05

Permit/Certification Number: AO17-211303

Date of Issue: April 17, 1992

Expiration Date: April 1, 1997

SPECIFIC CONDITIONS:

11. Particulate emissions tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with EPA methods 1, 2, 3 and 17. Such tests shall be conducted once per year before the end of September. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.

12. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standard of the Department (Specific Condition 4). A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emission standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the permittee has verified the problem or no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO₂ emission compliance by the temporary use of a spare SO₂ emission monitor. The spare SO₂ emissions monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

Maintain a QC program. As a minimum the QC program must include written procedures which should describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. CD determination and adjustment of CEMS.
3. Preventative maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling and analysis methods.
6. Program of corrective action for malfunctioning CEMS.

13. Excess emissions as stated in Florida Administrative Code Rule 17-2.250 shall be allowed.

14. The Department shall be notified as soon as possible (by telephone) of excess emissions that are beyond the allowances of FAC Rule 17-2.250, such as:

A. Any soot blowing or load changes that cause excess visible emissions for a period longer than three hours, or that exceed 60% opacity (six minute average) more than four times in any one day.

B. Any malfunction that causes visible emissions for a period longer than two hour in any one day.

C. A 24-hour average of SO₂ emissions measured by the continuous monitor that exceeds the standard, or daily average SO₂ emissions measured by coal analysis (in the event the permittee chooses) that exceeds the standard.

Immediately upon notification of excess emissions that are beyond the allowances, the permittee shall take the necessary steps to determine the cause and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation with corrective action to avoid recurrence.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004504 and 05
Permit/Certification Number: A017-211303
Date of Issue: April 17, 1992

Expiration Date: April 1, 1997

SPECIFIC CONDITIONS:

15. Immediately upon notification of a particulate test report that fails to demonstrate compliance with the particulate emission limit of 0.1 pounds per million Btu heat input, the permittee shall take necessary steps to determine the cause of the test failure and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation and a schedule for retesting when the cause of the test failure has been determined and corrected.

16. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.

17. An application to renew this permit shall be submitted prior to February 1, 1997.

18. The permanent source identification numbers for these point sources are:
10PEN17004504 Crist Unit No. 4, and
10PEN17004505 Crist Unit No. 5.

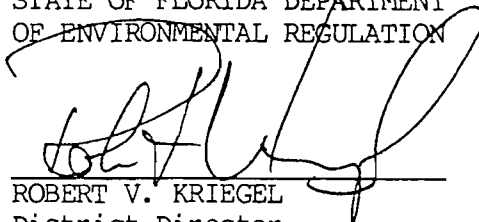
Please cite the appropriate number on all test reports and other correspondence specific to a permitted point source.

19. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 436-8364 during normal working hours.

Expiration date:
April 1, 1997

Issued this 17th day of April,
1992.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


ROBERT V. KRIEGEL
District Director



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32509-5704

LAWRENCE CHILES, Governor

CAROL M. BROWNER, Secretary

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004504 and 05
Permit/Certification Number: A017-211303
Date of Issue: April 17, 1992

Expiration Date: April 1, 1997
County: Escambia
Latitude/Longitude: 30°33'57"N/87°13'29.5"W
Section/Township/Range: 25/1N/30W
Project: Crist Units No. 4 and No. 5
Coal Fired Boilers

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of Crist Units No. 4 and No. 5, both coal fired boilers, generating 91 megawatts of electricity each. Particulate emissions from each Unit are controlled by hot side electrostatic precipitators manufactured by Buell Model BAL .2X34N333-4-3P followed by cold side electrostatic precipitators manufactured by Buell Model 1.1X48K33-1P. Sulfur dioxide emissions are controlled by the sulfur content of the coal used as fuel. Sulfur dioxide, nitrogen dioxide, oxygen and opacity are monitored by continuous emission monitors on each Unit.

Located at the east end of Pate Road, off Ten Mile Road, two miles east of State Road 292, north of Pensacola.

Specific Condition No. 7 requires logging excess emissions.
Specific Condition No. 8 requires keeping a maintenance log.
Specific Condition No. 9 requires submitting quarterly excess emissions reports.
Specific Condition No. 11 requires annual particulate emissions tests due before the end of September.
Specific Condition No. 12 requires maintenance of a QC program.
Specific Condition No. 14 requires reporting of excess emissions as soon as possible.
Specific Condition No. 15 requires actions taken upon particulate test failures.
Specific Condition No. 18 requires submittal of permit renewal application by February 1, 1997.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004504 and 05
Permit/Certification Number: A017-211303
Date of Issue: April 17, 1992

Expiration Date: April 1, 1997

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. The maximum allowable heat inputs are those heat inputs necessary to maintain electrical load output at 110% of the level at which the most recent successful particulate emissions compliance test was conducted for each unit. If the test was conducted at less than 90% of rated capacity of the unit, permittee may operate the unit at loads up to the rated capacity (91 megawatts for each unit) for purposes of preparation for testing for up to ten calendar days. The Department shall be advised in writing prior to each testing.
3. Particulate emissions shall not exceed 0.1 pounds per million Btu heat input.
4. Sulfur dioxide emissions shall not exceed 5.90 pounds per million Btu heat input.
5. Visible emissions shall not exceed 40% opacity.
6. Excess emissions are defined as:
 - A. Any six-minute average for opacity which exceeds the standard.
 - B. Any 24-hour average for sulfur dioxide which exceeds the standard.
7. A log shall be maintained showing the:
 - A. Duration of excess visible emissions and their causes.
 - B. Duration of excess SO₂ emissions.
8. A maintenance log of the continuous monitoring system shall be kept showing:
 - A. Time out of service.
 - B. Calibrations and adjustments.
9. A quarterly report of excess emissions shall be submitted within 30 days following the end of each calendar quarter. The report shall consist of each individual exceedance of opacity or SO₂ emissions (Specific Conditions 6 and 7) with duration, magnitude and cause. Any exceedance that is beyond the allowances of FAC Rule 17-2.250 shall be highlighted with note indicating compliance with Specific Condition 14 below.
10. Units 4 and 5 use a common stack (along with Units 1, 2 and 3). Visible emission violations from this stack shall be attributed to both Units unless opacity meter results show the specific Unit causing the violation.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004504 and 05
Permit/Certification Number: A017-211303
Date of Issue: April 17, 1992

Expiration Date: April 1, 1997

SPECIFIC CONDITIONS:

11. Particulate emissions tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with EPA methods 1, 2, 3 and 17. Such tests shall be conducted once per year before the end of September. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.

12. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standard of the Department (Specific Condition 4). A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emission standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the permittee has verified the problem or no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO₂ emission compliance by the temporary use of a spare SO₂ emission monitor. The spare SO₂ emissions monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

Maintain a QC program. As a minimum the QC program must include written procedures which should describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. CD determination and adjustment of CEMS.
3. Preventative maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling and analysis methods.
6. Program of corrective action for malfunctioning CEMS.

13. Excess emissions as stated in Florida Administrative Code Rule 17-2.250 shall be allowed.

14. The Department shall be notified as soon as possible (by telephone) of excess emissions that are beyond the allowances of FAC Rule 17-2.250, such as:

- A. Any soot blowing or load changes that cause excess visible emissions for a period longer than three hours, or that exceed 60% opacity (six minute average) more than four times in any one day.
- B. Any malfunction that causes visible emissions for a period longer than two hour in any one day.
- C. A 24-hour average of SO₂ emissions measured by the continuous monitor that exceeds the standard, or daily average SO₂ emissions measured by coal analysis (in the event the permittee chooses) that exceeds the standard.

Immediately upon notification of excess emissions that are beyond the allowances, the permittee shall take the necessary steps to determine the cause and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation with corrective action to avoid recurrence.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004504 and 05
Permit/Certification Number: A017-211303
Date of Issue: April 17, 1992

Expiration Date: April 1, 1997

SPECIFIC CONDITIONS:

15. Immediately upon notification of a particulate test report that fails to demonstrate compliance with the particulate emission limit of 0.1 pounds per million Btu heat input, the permittee shall take necessary steps to determine the cause of the test failure and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation and a schedule for retesting when the cause of the test failure has been determined and corrected.

16. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.

17. An application to renew this permit shall be submitted prior to February 1, 1997.

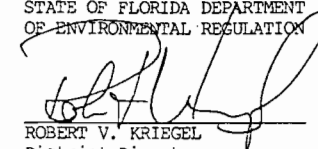
18. The permanent source identification numbers for these point sources are:
10PEN17004504 Crist Unit No. 4, and
10PEN17004505 Crist Unit No. 5.
Please cite the appropriate number on all test reports and other correspondence specific to a permitted point source.

19. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 436-8364 during normal working hours.

Expiration date:
April 1, 1997

Issued this 17th day of April,
1992.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


ROBERT V. KRIEGEL
District Director



Department of Environmental Protection

F

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

RECEIVED

AUG 30 1996

Virginia B. Wetherell
Secretary

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AO17-171809
Date of Issue: June 6, 1990
Date of Modification: December 12, 1994
Expiration Date: March 1, 1995
County: Escambia
Latitude/Longitude: 30°33'57"N/87°13'29.5"W
Project: Crist Unit 6

BUREAU OF AIR REGULATION

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 62-296, 62-297 and 62-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of Crist Unit 6. The coal-fired power boiler (Crist No. 6), also using oil & gas as auxiliary fuels, is used to supply steam for the generation of 320 MW of electricity. Emissions of particulates are controlled by an Electrostatic Precipitator (ESP), Wheelabrator model HaRDE. The ESP has a PM removal efficiency of 99.6% at full load flow conditions of 1,325,820 ACFM. Emissions of sulfur dioxide are controlled by the sulfur content of the coal. Continuous emissions monitoring systems for opacity, sulfur dioxide, nitrogen oxides and carbon dioxide are installed. Collected fly ash and bottom ash generated by the combustion of fossil fuels are to be disposed of in an on-site permitted landfill.

Located: Gulf Power Crist Plant, Ten Mile Road, on Governor's Bayou north of Pensacola.

Specific Condition 12 requires annual PM and VE testing before the end of September.

Specific Condition 17 requires submittal of an Annual Operating Report.

Specific Condition 18 requires submittal of a Major Air Pollution Source Annual Operation Fee Form, and appropriate fee, between January 15 and March 1 of each year.

Specific Condition 19 requires submittal of a permit renewal application before February 1, 1995.

AO17-171809

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506

Permit/Certification Number: AO17-171809

Date of Issue: June 6, 1990

Date of Modification: December 12, 1994

Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit. [FAC Rule 62-4.160]

Operation

2. The Electrostatic Precipitator, and Crist Unit 6 may operate continuously, i.e., 8760 hrs/yr. [FAC Rule 62-4.070 and construction permit application]

3. The nameplate capacity is 320 MW net output of electricity based on the maximum fuel consumption of 3368 MMBtu/hr input as measured by average fuel heating values. The maximum allowable heat input is that heat input necessary to maintain electrical load output at 110 percent of nameplate capacity or the level at which the most recent successful emissions compliance test was conducted. [FAC Rule 62-4.070 and construction permit application]

Emissions

4. The manner, nature, volume and frequency of permitted emissions, applicable emissions limiting standards (if any) and allowable emissions are listed as per FAC Rule 62-210.300(2)(a):

| <u>Airborne Contaminant Emitted</u> | <u>FAC Rule</u> | <u>Allowable Emissions T/yr</u> |
|-------------------------------------|--------------------|----------------------------------|
| Particulate Matter | 62-296.405(1)(b) | 1475 1 |
| Sulfur Dioxide | 62-296.405(1)(c)2c | 87035 2 |
| Objectionable Odors | 62-296.320(2) | None allowed off plant property. |
| Visible Emissions | 62-296.405 | Not more than 40% opacity 3 |

1 Based on steady-state operating parameters, and rule: PM emissions shall not exceed 0.1 lb PM per million Btu heat input.

2 Based on steady-state operating parameters, and rule: SO₂ emissions shall not exceed 5.90 lb SO₂ per million Btu heat input.

3 Department order dated May 12, 1988.

5. Excess emissions as stated in FAC Rule 62-210.700 shall be allowed. The steady-state hourly emissions rate allowable for PM listed in Specific Condition 4 shall not apply during soot-blowing or load changes. However, PM emissions shall not exceed an average of 0.3 lb/MM Btu heat input (equivalent to 1011 lb/hr allowable emissions - steady state) during the 3 hour excess emissions period allowed by 62-210.700 (ref. FAC Rule 62-210.700(3))

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506

Permit/Certification Number: A017-171809

Date of Issue: June 6, 1990

Date of Modification: December 12, 1994

Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

6. Excess emissions are defined as:

A. Any six-minute average for opacity which exceeds the standard.

B. Any 24-hour average for sulfur dioxide which exceeds the standard.

7. The Department shall be notified as soon as possible (by telephone) of excess emissions that are beyond the allowances of FAC Rule 62-210.700, such as:

A. Any soot blowing or load changes that cause excess visible emissions for a period longer than three hours, or that exceed 60 percent opacity (six minute average) more than four times in any one 24-hour period.

B. Any malfunction that causes excess visible emissions for a period longer than two hours in any one 24-hour period.

C. A 24-hour average of SO₂ emissions measured by the continuous monitor that exceeds the standard, or daily average SO₂ emissions measured by coal analysis (in the event the permittee chooses) that exceeds the standard.

Immediately upon notification of excess emissions that are beyond the allowances, the permittee shall take the necessary steps to determine the cause and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation with corrective action to avoid recurrence.

8. A log shall be maintained showing the duration, magnitude and cause of excess visible emissions, and of excess SO₂ emissions. [FAC Rule 62-4.070 and construction permit application]

9. A quarterly report of excess emissions shall be submitted within 30 days following the end of each calendar quarter. The report shall consist of each individual exceedance of opacity or SO₂ emissions (specific conditions 6 and 7) with duration, magnitude and cause. Any exceedance that is beyond the allowances of FAC Rule 62-210.700 shall be highlighted with note indicating compliance with specific condition 7. A continuous emissions monitor quarterly summary report shall be submitted for SO₂ and opacity.

10. A maintenance log of the continuous monitoring system shall be kept showing time out of service, and calibrations and adjustments. [FAC Rule 62-4.070 and construction permit application]

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AO17-171809
Date of Issue: June 6, 1990
Date of Modification: December 12, 1994
Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

11. All fugitive dust generated at this site shall be adequately controlled by existing good housekeeping practices. [FAC Rule 62-296.310(3)]

Testing

12. Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted once per year before the end of September. Such tests shall be scheduled within 30 days after construction is completed. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.

| <u>Pollutant</u> | <u>Test Method</u> |
|------------------|----------------------------|
| PM | EPA method 1, 2, 3, and 17 |
| VE | DEP method 9 |

The VE test shall be conducted during one of the PM test runs. Continuous Emissions Monitor (transmissometer) readings may be substituted for a VE Method 9 test as per F.A.C. Rule 62-297.500 and table 297.330-1. Continuous opacity monitoring summaries of rolling six-minute averages covering the full time period spanned by each PM test run may be submitted in lieu of the visible emissions tests according to DEP Method 9 conducted concurrently with one of the mass emission runs of each PM test. Test reports shall comply with F.A.C. Rule 62-297.570, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.340(2). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the department. [FAC Rule 62-4.070]

13. Immediately upon notification of a particulate test report that fails to demonstrate compliance with the particulate emission limit of 0.1 pounds per million Btu heat input, the permittee shall take necessary steps to determine the cause of the test failure and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation and a schedule for retesting when the cause of the test failure has been determined and corrected. [FAC Rule 62-4.070 and construction permit application]

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506

Permit/Certification Number: AO17-171809

Date of Issue: June 6, 1990

Date of Modification: December 12, 1994

Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

14. Boilers No. 6 and 7 use a common stack. Visible emissions violations from this stack shall be attributed to both boilers unless opacity meter results show the specific boiler causing the violation. [FAC Rule 62-4.070 and construction permit application]

15. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standard of the Department (specific condition 4). A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emission standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the permittee has verified the problem or no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO₂ emission compliance by the temporary use of a spare SO₂ emission monitor. The spare SO₂ emission monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling. [FAC Rule 62-4.070 and construction permit application]

16. The permittee shall implement and maintain a QC program. As a minimum, the QC program must include written procedures which should describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. Calibration Drift determination and adjustment of CEMS.
3. Preventive maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling and analysis methods.
6. Program of corrective action for malfunctioning CEMS.

[FAC Rule 62-4.070 and construction permit application]

Administrative

17. An annual operation report [DEP Form 62-210.900(4) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.

18. In accordance with F.A.C. Rule 62-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 62-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AO17-171809
Date of Issue: June 6, 1990
Date of Modification: December 12, 1994
Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

19. An application to renew this permit shall be submitted prior to February 1, 1995, unless this permit is extended by Department action. [FAC Rule 62-4.090]

20. The permanent source identification number for this point source is 10PEN17004506. Please cite this number on all test reports and other correspondence specific to this permitted point source. [FAC Rule 62-297.570]

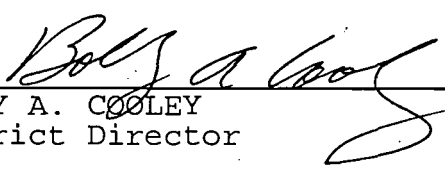
21. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 444-8364 during normal working hours. [FAC Rule 62-210.700]

Expiration Date:

March 1, 1995

Issued this 12th day of December, 1994.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director

Memorandum

Florida Department of Environmental Protection

TO : Bobby A. Cooley
THROUGH : Ed K. Middleswart, P.E. *Ed M 12/17*
FROM : *AA* Andy Allen, Armando I. Sarasua *AA*
DATE : December 7, 1994
SUBJECT : Evaluation Summary for Gulf Power Company, Crist Unit 6,
AO17-171809, source number 10PEN17004506

We recommend including in the existing permit, AO17-171809, the new replacement electrostatic precipitator which was constructed under AC17-234016. There was no increase in emissions and the language of the existing permit is slightly revised to accommodate current permitting guidelines. The current permit expires 3/1/95 and is extended for Title V sources, FAC Rule 62-213.

Process Description Coal-fired power boiler supplies steam for the generation of 320 MW of electricity. Fly ash particulate matter is electrostatically charged as it passes through ESP corona. Electric forces attract PM to collecting plates. Plates are rapped periodically to loosen collected PM. PM slides down plates into hopper. Collected fly ash PM and bottom ash generated by combustion of fossil fuels are disposed of in an on-site permitted landfill.

Pollution Control Equipment The new ESP, Wheelabrator model HaRDE, has a PM removal efficiency of 99.6% at full load flow conditions of 1,325,820 ACFM. Emissions of sulfur dioxide are controlled by coal sulfur content. Continuous emissions monitoring systems for opacity, sulfur dioxide, nitrogen oxides and carbon dioxide are installed. Crist Units 6 and 7 share the ESP and stack.

Environmental Impact

| Airborne Contaminant Emitted | FAC Rule | Estimated Emissions | | Allowable Emissions | |
|------------------------------------|--------------------|------------------------|-------|-------------------------------------|-------|
| | | lbs/hr | T/yr | lb/hr | T/yr |
| PM | 62-296.405(1)(b) | 126 | 551 | 337 | 1475 |
| SO ₂ | 62-296.405(1)(c)2c | 9791 | 42855 | 19871 | 87035 |
| VOC | N/A | 10 | 43 | N/A | N/A |
| NO _x | N/A | 4378 | 19177 | N/A | N/A |
| CO | N/A | 55 | 241 | N/A | N/A |
| Pb | N/A | 2 | 8 | N/A | N/A |
| Objectionable Odors | 62-296.320(2) | N/A | N/A | None allowed off plant property. | |
| VE | 62-296.405 | N/A | N/A | Not more than 40% opacity | |

Applicable Rules & Regulations FAC Rules shown above.

Compliance Monitoring Continuous VE, SO₂, NO_x and CO₂ emission monitoring 24-hour averages. Annual PM and VE emissions testing.

Compliance History Compliance testing after construction showed actual PM emissions to be 0.006 lb/MMBtu, as compared to 0.1 lb/MMBtu allowable.

AIS:asc



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AO17-171809
Date of Issue: June 6, 1990
Date of Modification: October 5, 1994
Expiration Date: March 1, 1995
County: Escambia
Latitude/Longitude: 30°33'57"N/87°13'29.5"W
Project: Crist Unit 6

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 62-296, 62-297 and 62-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of Crist Unit 6. The coal-fired power boiler (Crist No. 6) is used to supply steam for the generation of 320 MW of electricity. Emissions of particulates are controlled by an Electrostatic Precipitator (ESP), Wheelabrator model HARDE. The ESP has a PM removal efficiency of 99.6% at full load flow conditions of 1,325,820 ACFM. Emissions of sulfur dioxide are controlled by the sulfur content of the coal. Continuous emissions monitoring systems for opacity, sulfur dioxide, nitrogen oxides and oxygen are installed. Collected fly ash and bottom ash generated by the combustion of fossil fuels are to be disposed of in an on-site permitted landfill.

Located: Gulf Power Crist Plant, Ten Mile Road, on Governor's Bayou north of Pensacola.

Specific Condition 14 requires annual PM and VE testing before the end of September.

Specific Condition 20 requires submittal of an Annual Operating Report.

Specific Condition 21 requires submittal of a Major Air Pollution Source Annual Operation Fee Form, and appropriate fee, between January 15 and March 1 of each year.

Specific Condition 22 requires submittal of a permit renewal application before February 1, 1995.

AO17-257799

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"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AO17-171809
Date of Issue: June 6, 1990
Date of Modification: October 5, 1994
Expiration Date: September 1, 1999

SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit. [FAC Rule 62-4.160]

Operation

2. The Electrostatic Precipitator, and Crist Unit 6 may operate continuously, i.e., 8760 hrs/yr. [FAC Rule 62-4.070 and construction permit application]

3. The maximum allowable operating rate is 320 MW of electricity. This is equivalent to 3368 MMBtu/hr heat input. This is the operating rate at which compliance with standards shall be demonstrated. [FAC Rule 62-4.070 and construction permit application]

4. The sulfur content of fuels used at Crist Unit 6 shall be limited to a maximum, on a weight basis, of 0.5% for fuel oil and 3.5% for coal. [FAC Rule 62-4.070 and construction permit application]

Emissions

5. The manner, nature, volume and frequency of permitted emissions, applicable emissions limiting standards (if any) and allowable emissions are listed as per FAC Rule 62-210.300(2)(a):

| <u>Airborne Contaminant Emitted</u> | <u>FAC Rule</u> | <u>Allowable Emissions T/yr</u> |
|---|--------------------|---|
| PM | 62-296.405(1)(b) | 1475 ¹ |
| SO ₂ | 62-296.405(1)(c)2c | 87035 ² |
| Objectionable Odors | 62-296.320(2) | None allowed off plant property. |
| VE | 62-296.405 | Not more than 40% opacity ³ |

¹ Based on steady-state operating parameters, and rule: PM emissions shall not exceed 0.1 lb PM per million Btu heat input.

² Based on steady-state operating parameters, and rule: SO₂ emissions shall not exceed 5.90 lb SO₂ per million Btu heat input.

³ Department order dated May 12, 1988.

6. Excess emissions as stated in FAC Rule 62-210.700 shall be allowed. The steady-state hourly emissions rate allowable for PM listed in Specific Condition 5 shall not apply during soot-blowing or load changes. However, PM emissions shall not exceed an average of 0.3 lb/MM Btu heat input (equivalent to 1011 lb/hr allowable emissions - steady state) during the 3 hour excess emissions period allowed by 62-210.700 [ref. FAC Rule 62-210.700(3)]

PERMITTEE: I.D. Number: 10PEN17004506
Gulf Power Company Permit/Certification Number: AO17-171809
Date of Issue: June 6, 1990
Date of Modification: October 5, 1994
Expiration Date: September 1, 1999

SPECIFIC CONDITIONS:

7. Excess emissions are defined as:

A. Any six-minute average for opacity which exceeds the standard.

B. Any 24-hour average for sulfur dioxide which exceeds the standard.

8. The Department shall be notified as soon as possible (by telephone) of excess emissions that are beyond the allowances of FAC Rule 62-210.700, such as:

A. Any soot blowing or load changes that cause excess visible emissions for a period longer than three hours, or that exceed 60 percent opacity (six minute average) more than four times in any one 24-hour period.

B. Any malfunction that causes excess visible emissions for a period longer than two hours in any one 24-hour period.

C. A 24-hour average of SO₂ emissions measured by the continuous monitor that exceeds the standard, or daily average SO₂ emissions measured by coal analysis (in the event the permittee chooses) that exceeds the standard.

Immediately upon notification of excess emissions that are beyond the allowances, the permittee shall take the necessary steps to determine the cause and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation with corrective action to avoid recurrence.

9. A log shall be maintained showing the duration, magnitude and cause of excess visible emissions, and of excess SO₂ emissions. [FAC Rule 62-4.070 and construction permit application]

10. A quarterly report of excess emissions shall be submitted within 30 days following the end of each calendar quarter. The report shall consist of each individual exceedance of opacity or SO₂ emissions (specific Conditions 7 and 8) with duration, magnitude and cause. Any exceedance that is beyond the allowances of FAC Rule 62-210.700 shall be highlighted with note indicating compliance with specific condition 8. A continuous emissions monitor quarterly summary report shall be submitted for each CEM.

11. A maintenance log of the continuous monitoring system shall be kept showing time out of service, and calibrations and adjustments. [FAC Rule 62-4.070 and construction permit application]

PERMITTEE: I.D. Number: 10PEN17004506
Gulf Power Company Permit/Certification Number: AO17-171809
Date of Issue: June 6, 1990
Date of Modification: October 5, 1994
Expiration Date: September 1, 1999

SPECIFIC CONDITIONS:

12. All fugitive dust generated at this site shall be adequately controlled by existing good housekeeping practices such as periodic sweeping and/or vacuuming of work areas, and closing doors on windy days. [FAC Rule 62-296.310(3)]

Testing

13. Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in once per year before the end of September. Such tests shall be scheduled within 30 days after construction is completed. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.

| <u>Pollutant</u> | <u>Test Method</u> |
|------------------|----------------------------|
| PM | EPA method 1, 2, 3, and 17 |
| VE | DER method 9 |

The VE test shall be conducted during one of the PM test runs. Continuous Emissions Monitor (transmissometer) readings may be substituted for a VE Method 9 test as per F.A.C. Rule 62-297.500 and table 297.330-1. Continuous opacity monitoring summaries of rolling six-minute averages covering the full time period spanned by each PM test run may be submitted in lieu of the visible emissions tests according to DEP Method 9 conducted concurrently with one of the mass emission runs of each PM test. Test reports shall comply with F.A.C. Rule 62-297.570, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.340(2). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the department. [FAC Rule 62-4.070]

14. Immediately upon notification of a particulate test report that fails to demonstrate compliance with the particulate emission limit of 0.1 pounds per million Btu heat input, the permittee shall take necessary steps to determine the cause of the test failure and arrange a meeting with the Department within 72 hours to discuss a settlement

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506

Permit/Certification Number: AO17-171809

Date of Issue: June 6, 1990

Date of Modification: October 5, 1994

Expiration Date: September 1, 1999

SPECIFIC CONDITIONS:

of the violation and a schedule for retesting when the cause of the test failure has been determined and corrected. [FAC Rule 62-4.070 and construction permit application]

15. The maximum allowable heat input is that heat input necessary to maintain electrical load output at 110 percent of the level at which the most recent successful particulate emissions compliance test was conducted. If the test was conducted at less than 90 percent of rated capacity of the unit, permittee may operate the unit at loads up to the rated capacity (320 megawatts) for purposes of preparation for testing for up to fifteen calendar days. The Department shall be advised in writing prior to each testing. [FAC Rule 62-4.070 and construction permit application]

16. Boilers No. 6 and 7 use a common stack. Visible emission violations from this stack shall be attributed to both boilers unless opacity meter results show the specific boiler causing the violation. [FAC Rule 62-4.070 and construction permit application]

17. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standard of the Department (specific condition 5). A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emission standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the permittee has verified the problem or no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO₂ emission compliance by the temporary use of a spare SO₂ emission monitor. The spare SO₂ emission monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling. [FAC Rule 62-4.070 and construction permit application]

18. The permittee shall implement and maintain a QC program. As a minimum, the QC program must include written procedures which should describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. Calibration Drift determination and adjustment of CEMS.
3. Preventive maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling and analysis methods.
6. Program of corrective action for malfunctioning CEMS.

[FAC Rule 62-4.070 and construction permit application]

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506

Permit/Certification Number: AO17-171809

Date of Issue: June 6, 1990

Date of Modification: October 5, 1994

Expiration Date: September 1, 1999

SPECIFIC CONDITIONS:

Administrative

19. An annual operation report [DEP Form 62-210.900(4) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.

20. In accordance with F.A.C. Rule 62-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 62-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

21. An application to renew this permit shall be submitted prior to February 1, 1995, unless permit extended by Department action. [FAC Rule 62-4.090]

22. The permanent source identification number for this point source is 10PEN17004506. Please cite this number on all test reports and other correspondence specific to this permitted point source. [FAC Rule 62-297.570]

23. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 444-8364 during normal working hours. [FAC Rule 62-210.700]

Expiration Date:

Issued this 5th day of October,
1994.

September 1, 1999

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



BOBBY A. COOLEY
District Director

AO17-257799



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AO17-171809
Date of Issue: June 6, 1990
Date of Modification: December 12, 1994
Expiration Date: March 1, 1995
County: Escambia
Latitude/Longitude: 30°33'57"N/87°13'29.5"W
Project: Crist Unit 6

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 62-296, 62-297 and 62-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of Crist Unit 6. The coal-fired power boiler (Crist No. 6), also using oil & gas as auxiliary fuels, is used to supply steam for the generation of 320 MW of electricity. Emissions of particulates are controlled by an Electrostatic Precipitator (ESP), Wheelabrator model HARDE. The ESP has a PM removal efficiency of 99.6% at full load flow conditions of 1,325,820 ACFM. Emissions of sulfur dioxide are controlled by the sulfur content of the coal. Continuous emissions monitoring systems for opacity, sulfur dioxide, nitrogen oxides and carbon dioxide are installed. Collected fly ash and bottom ash generated by the combustion of fossil fuels are to be disposed of in an on-site permitted landfill.

Located: Gulf Power Crist Plant, Ten Mile Road, on Governor's Bayou north of Pensacola.

Specific Condition 12 requires annual PM and VE testing before the end of September.

Specific Condition 17 requires submittal of an Annual Operating Report.

Specific Condition 18 requires submittal of a Major Air Pollution Source Annual Operation Fee Form, and appropriate fee, between January 15 and March 1 of each year.

Specific Condition 19 requires submittal of a permit renewal application before February 1, 1995.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AO17-171809
Date of Issue: June 6, 1990
Date of Modification: December 12, 1994
Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit. [FAC Rule 62-4.160]

Operation

2. The Electrostatic Precipitator, and Crist Unit 6 may operate continuously, i.e., 8760 hrs/yr. [FAC Rule 62-4.070 and construction permit application]

3. The nameplate capacity is 320 MW net output of electricity based on the maximum fuel consumption of 3368 MMBtu/hr input as measured by average fuel heating values. The maximum allowable heat input is that heat input necessary to maintain electrical load output at 110 percent of nameplate capacity or the level at which the most recent successful emissions compliance test was conducted. [FAC Rule 62-4.070 and construction permit application]

Emissions

4. The manner, nature, volume and frequency of permitted emissions, applicable emissions limiting standards (if any) and allowable emissions are listed as per FAC Rule 62-210.300(2)(a):

| Airborne Contaminant Emitted | FAC Rule | Allowable Emissions T/yr |
|------------------------------------|--------------------|-------------------------------------|
| Particulate Matter | 62-296.405(1)(b) | 1475 1 |
| Sulfur Dioxide | 62-296.405(1)(c)2c | 87035 2 |
| Objectionable Odors | 62-296.320(2) | None allowed off plant property. |
| Visible Emissions | 62-296.405 | Not more than 40% opacity 3 |

1 Based on steady-state operating parameters, and rule: PM emissions shall not exceed 0.1 lb PM per million Btu heat input.

2 Based on steady-state operating parameters, and rule: SO₂ emissions shall not exceed 5.90 lb SO₂ per million Btu heat input.

3 Department order dated May 12, 1988.

5. Excess emissions as stated in FAC Rule 62-210.700 shall be allowed. The steady-state hourly emissions rate allowable for PM listed in Specific Condition 4 shall not apply during soot-blowing or load changes. However, PM emissions shall not exceed an average of 0.3 lb/MM Btu heat input (equivalent to 1011 lb/hr allowable emissions - steady state) during the 3 hour excess emissions period allowed by 62-210.700 (ref. FAC Rule 62-210.700(3))

AO17-171809

1

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AO17-171809

2

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AO17-171809
Date of Issue: June 6, 1990
Date of Modification: December 12, 1994
Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

6. Excess emissions are defined as:

A. Any six-minute average for opacity which exceeds the standard.

B. Any 24-hour average for sulfur dioxide which exceeds the standard.

7. The Department shall be notified as soon as possible (by telephone) of excess emissions that are beyond the allowances of FAC Rule 62-210.700, such as:

A. Any soot blowing or load changes that cause excess visible emissions for a period longer than three hours, or that exceed 60 percent opacity (six minute average) more than four times in any one 24-hour period.

B. Any malfunction that causes excess visible emissions for a period longer than two hours in any one 24-hour period.

C. A 24-hour average of SO₂ emissions measured by the continuous monitor that exceeds the standard, or daily average SO₂ emissions measured by coal analysis (in the event the permittee chooses) that exceeds the standard.

Immediately upon notification of excess emissions that are beyond the allowances, the permittee shall take the necessary steps to determine the cause and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation with corrective action to avoid recurrence.

8. A log shall be maintained showing the duration, magnitude and cause of excess visible emissions, and of excess SO₂ emissions. [FAC Rule 62-4.070 and construction permit application]

9. A quarterly report of excess emissions shall be submitted within 30 days following the end of each calendar quarter. The report shall consist of each individual exceedance of opacity or SO₂ emissions (specific conditions 6 and 7) with duration, magnitude and cause. Any exceedance that is beyond the allowances of FAC Rule 62-210.700 shall be highlighted with note indicating compliance with specific condition 7. A continuous emissions monitor quarterly summary report shall be submitted for SO₂ and opacity.

10. A maintenance log of the continuous monitoring system shall be kept showing time out of service, and calibrations and adjustments. [FAC Rule 62-4.070 and construction permit application]

AO17-171809

3

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AO17-171809
Date of Issue: June 6, 1990
Date of Modification: December 12, 1994
Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

11. All fugitive dust generated at this site shall be adequately controlled by existing good housekeeping practices. [FAC Rule 62-296.310(3)]

Testing

12. Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted once per year before the end of September. Such tests shall be scheduled within 30 days after construction is completed. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.

Pollutant

PM
VE

Test Method

EPA method 1, 2, 3, and 17
DEP method 9

The VE test shall be conducted during one of the PM test runs. Continuous Emissions Monitor (transmissometer) readings may be substituted for a VE Method 9 test as per F.A.C. Rule 62-297.500 and table 297.330-1. Continuous opacity monitoring summaries of rolling six-minute averages covering the full time period spanned by each PM test run may be submitted in lieu of the visible emissions tests according to DEP Method 9 conducted concurrently with one of the mass emission runs of each PM test. Test reports shall comply with F.A.C. Rule 62-297.570, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.340(2). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the department. [FAC Rule 62-4.070]

13. Immediately upon notification of a particulate test report that fails to demonstrate compliance with the particulate emission limit of 0.1 pounds per million Btu heat input, the permittee shall take necessary steps to determine the cause of the test failure and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation and a schedule for retesting when the cause of the test failure has been determined and corrected. [FAC Rule 62-4.070 and construction permit application]

AO17-171809

4

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AO17-171809
Date of Issue: June 6, 1990
Date of Modification: December 12, 1994
Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

14. Boilers No. 6 and 7 use a common stack. Visible emissions violations from this stack shall be attributed to both boilers unless opacity meter results show the specific boiler causing the violation. [FAC Rule 62-4.070 and construction permit application]

15. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standard of the Department (specific condition 4). A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emission standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the permittee has verified the problem or no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO₂ emission compliance by the temporary use of a spare SO₂ emission monitor. The spare SO₂ emission monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling. [FAC Rule 62-4.070 and construction permit application]

16. The permittee shall implement and maintain a QC program. As a minimum, the QC program must include written procedures which should describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. Calibration Drift determination and adjustment of CEMS.
3. Preventive maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling and analysis methods.
6. Program of corrective action for malfunctioning CEMS.

[FAC Rule 62-4.070 and construction permit application]

Administrative

17. An annual operation report [DEP Form 62-210.900(4) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.

18. In accordance with F.A.C. Rule 62-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 62-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AO17-171809
Date of Issue: June 6, 1990
Date of Modification: December 12, 1994
Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

19. An application to renew this permit shall be submitted prior to February 1, 1995, unless this permit is extended by Department action. [FAC Rule 62-4.090]

20. The permanent source identification number for this point source is 10PEN17004506. Please cite this number on all test reports and other correspondence specific to this permitted point source. [FAC Rule 62-297.570]


21. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 444-8364 during normal working hours. [FAC Rule 62-210.700]

Expiration Date:

March 1, 1995

Issued this 12th day of December, 1994.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director

Memorandum

Florida Department of Environmental Protection

TO : Bobby A. Cooley
THROUGH : Ed K. Middleswart, P.E. *Ed M 12/17*
FROM : *ASA* Andy Allen, Armando I. Sarasua *AA*
DATE : December 7, 1994
SUBJECT : Evaluation Summary for Gulf Power Company, Crist Unit 6,
AO17-171809, source number 10PEN17004506

We recommend including in the existing permit, AO17-171809, the new replacement electrostatic precipitator which was constructed under AC17-234016. There was no increase in emissions and the language of the existing permit is slightly revised to accommodate current permitting guidelines. The current permit expires 3/1/95 and is extended for Title V sources, FAC Rule 62-213.

Process Description Coal-fired power boiler supplies steam for the generation of 320 MW of electricity. Fly ash particulate matter is electrostatically charged as it passes through ESP corona. Electric forces attract PM to collecting plates. Plates are rapped periodically to loosen collected PM. PM slides down plates into hopper. Collected fly ash PM and bottom ash generated by combustion of fossil fuels are disposed of in an on-site permitted landfill.

Pollution Control Equipment The new ESP, Wheelabrator model HaRDE, has a PM removal efficiency of 99.6% at full load flow conditions of 1,325,820 ACFM. Emissions of sulfur dioxide are controlled by coal sulfur content. Continuous emissions monitoring systems for opacity, sulfur dioxide, nitrogen oxides and carbon dioxide are installed. Crist Units 6 and 7 share the ESP and stack.

Environmental Impact

| Airborne Contaminant Emitted | FAC Rule | Estimated Emissions | | Allowable Emissions | |
|------------------------------------|--------------------|------------------------|-------|-------------------------------------|-------|
| | | lbs/hr | T/yr | lb/hr | T/yr |
| PM | 62-296.405(1)(b) | 126 | 551 | 337 | 1475 |
| SO ₂ | 62-296.405(1)(c)2c | 9791 | 42855 | 19871 | 87035 |
| VOC | N/A | 10 | 43 | N/A | N/A |
| NO _x | N/A | 4378 | 19177 | N/A | N/A |
| CO | N/A | 55 | 241 | N/A | N/A |
| Pb | N/A | 2 | 8 | N/A | N/A |
| Objectionable Odors | 62-296.320(2) | N/A | N/A | None allowed off plant property. | |
| VE | 62-296.405 | N/A | N/A | Not more than 40% opacity | |

Applicable Rules & Regulations FAC Rules shown above.

Compliance Monitoring Continuous VE, SO₂, NO_x and CO₂ emission monitoring 24-hour averages. Annual PM and VE emissions testing.

Compliance History Compliance testing after construction showed actual PM emissions to be 0.006 lb/MMBtu, as compared to 0.1 lb/MMBtu allowable.

AIS:asc



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794 • 904-436-8300

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary
Robert Krieger, Deputy Assistant Secretary

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: A017-171809
Date of Issue: JUN 6 1990

Expiration Date: March 1, 1995
County: Escambia
Latitude/Longitude: 30°33'57"N/87°13'29.5"W
Section/Township/Range: 25/1N/30W
Project: Crist Boiler #6

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of utility boiler (Crist #6) to supply steam for generation of 320 MW of electricity. This boiler is fueled with coal.

Emissions of particulates are controlled by an electro-static precipitator. Emissions of sulfur dioxide are controlled by the sulfur content of the coal. Continuous emissions monitoring systems for opacity, sulfur dioxide, nitrogen oxides and oxygen are installed.

Located at Crist Plant, Governors Bayou, north of Pensacola.

The following specific conditions require timely action by the permittee during the life of this permit:

- 20 Logging excess emissions (each occurrence)
- 21 Logging CEM maintenance (each occurrence)
- 22 Excess emissions report (quarterly)
- 24 Annual particulates test (prior to end of September)
- 25 QC Program (within 90 days after permit issuance)
- 27 Report of excess emissions, not allowed (each occurrence)
- 28 Report of particulate stack test exceedence (each occurrence)
- 30 Apply for permit renewal (prior to January 1, 1995)

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: A017-171809
Date of Issue:

Expiration Date: March 1, 1995

GENERAL CONDITIONS:

14. 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 the 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.

SPECIFIC CONDITIONS:

15. The maximum allowable heat input is that heat input necessary to maintain electrical load output at 110 percent of the level at which the most recent successful particulate emissions compliance test was conducted. If the test was conducted at less than 90 percent of rated capacity of the unit, permittee may operate the unit at loads up to the rated capacity (500 megawatts) for purposes of preparation for testing for up to ten calendar days. The Department shall be advised in writing prior to each testing. 320 R

16. Particulate emissions shall not exceed 0.1 pounds per million Btu heat input.

17. Sulfur dioxide emissions shall not exceed 5.90 pounds per million Btu heat input.

18. Visible emissions shall not exceed 40 percent opacity.

19. Excess emissions are defined as:

- A. Any six minute average for opacity which exceeds the standard.
- B. Any 24 hour average for sulfur dioxide which exceeds the standard.

20. A log shall be maintained showing the:

- A. Duration of excess visible emissions and their causes.
- B. Duration of excess SO₂ emissions.

21. A maintenance log of the continuous monitoring system shall be kept showing:

- A. Time out of service.
- B. Calibrations and adjustments.

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: A017-171809
Date of Issue:

Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

22. A quarterly report of excess emissions shall be submitted within 30 days following the end of each calendar quarter. The report shall consist of each individual exceedance of opacity or SO₂ emissions (Specific Conditions 19 and 20) with duration, magnitude and cause. Any exceedance that is beyond the allowances of FAC Rule 17-2.250 shall be highlighted with note indicating compliance with Specific Condition 27 below.

A continuous emission monitor quarterly summary report shall be submitted for each CEM.

23. Boilers #6 and #7 use a common stack. Visible emission violations from this stack shall be attributed to both boilers unless opacity meter results show the specific boiler causing the violation.

24. Particulate tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with EPA methods 1, 2, 3 and 17. Such tests shall be conducted once per year before the end of September. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.

25. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standard of the Department (Specific Condition 17). A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emission standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the permittee has verified the problem or no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO₂ emission compliance by the temporary use of a spare SO₂ emission monitor. The spare SO₂ emission monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

Develop and implement a QC program. As a minimum the QC program must include written procedures which should describe in detail, complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. CD determination and adjustment of CEMS.
3. Preventive maintenance of CEMS (including spare parts inventory).

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: A017-171809
Date of Issue:

Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling and analysis methods.
6. Program of corrective action for malfunctioning CEMS.

26. Excess emissions as stated in Florida Administrative Code Rule 17-2.250 shall be allowed.

27. The Department shall be notified as soon as possible (by telephone) of excess emissions that are beyond the allowances of FAC Rule 17-2.250, such as:

A. Any soot blowing or load changes that cause excess visible emissions for a period longer than three hours, or that exceed 60 percent opacity (six minute average) more than four times in any one day.

B. Any malfunction that causes excess visible emissions for a period longer than two hours in any one day.

C. A 24-hour average of SO₂ emissions measured by the continuous monitor that exceeds the standard, or daily average SO₂ emissions measured by coal analysis (in the event the permittee chooses) that exceeds the standard.

Immediately upon notification of excess emissions that are beyond the allowances, the permittee shall take the necessary steps to determine the cause and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation with corrective action to avoid recurrence.

28. Immediately upon notification of a particulate test report that fails to demonstrate compliance with the particulate emission limit of 0.1 pounds per million Btu heat input, the permittee shall take necessary steps to determine the cause of the test failure and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation and a schedule for retesting when the cause of the test failure has been determined and corrected.

29. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.

30. The permanent source identification number for this point source is 10PEN17004506. Please cite this number on all test reports and other correspondence specific to this permitted point source.

31. An application to renew this permit shall be submitted prior to January 1, 1995.

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506

Permit/Certification Number: A017-171809

Date of Issue:

Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

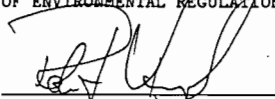
32. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 436-8364 during normal working hours.

Expiration date:

March 1, 1995

Issued this 5th day of June,
1990.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


ROBERT V. KRIEGEL
Deputy Assistant Secretary



Lawton Chiles
Governor

Florida Department of
Environmental Protection

ENVIRONMENTAL
PROTECTION
DEPARTMENT
14 1993

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AC17-234016
Date of Issue: October 7, 1993
Expiration Date: December 1, 1994
County: Escambia
Latitude/Longitude: 30°33'57"N/87°13'29.5"W
Project: Electrostatic Precipitator, Crist 6

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Construction of a replacement Electrostatic Precipitator (ESP), for Crist Unit No. 6. The new ESP will reduce PM emissions by 922 T/yr. The coal-fired power boiler (Crist No. 6) is used to supply steam for the generation of 320 MW of electricity.

Emissions of particulates will be controlled by the ESP, Wheelabrator model HaRDE. The ESP has a PM removal efficiency of 99.6% at full load flow conditions of 1,325,820 ACFM. Emissions of sulfur dioxide are controlled by the sulfur content of the coal. Continuous emissions monitoring systems for opacity, sulfur dioxide, nitrogen oxides and oxygen are installed. Collected fly ash and bottom ash generated by the combustion of fossil fuels are to be disposed of in an on-site permitted landfill.

Located: Gulf Power Crist Plant, Ten Mile Road, on Governor's Bayou, north of Pensacola.

Specific Condition No. 2 requires notification upon commencement of construction. Projects beyond one year require annual status reports.

Specific Condition No. 2 also requires notification and prior approval of any changes or revisions made during construction.

Specific Condition No. 18 requires submittal of certificate of completion of construction with appropriate fee within 75 days after completion of construction.

Specific Condition No. 18 also requires obtaining an operating permit before the expiration date (December 1, 1994) of this construction permit for continued operation.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AC17-234016
Date of Issue: October 7, 1993
Expiration Date: December 1, 1994

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. The Department shall be notified upon commencement of construction. The Department shall be notified and prior approval shall be obtained of any substantial changes or revisions made during construction. Projects beyond one year require annual status reports.
3. The nameplate capacity is 320 MW net output of electricity based on the maximum fuel consumption of 3368 MBtu/hr input as measured by average fuel heating values. This is the operating rate at which compliance with standards shall be demonstrated. The maximum allowable heat input is that heat input necessary to maintain electrical load output at 110 percent of nameplate capacity or the level at which the most recent successful emissions compliance test was conducted. If the test was conducted at less than 90 percent of nameplate capacity of the unit, permittee may operate the unit at loads up to the nameplate capacity for purposes of preparation for testing for up to ten calendar days. The Department shall be advised in writing prior to each testing.
4. The Electrostatic Precipitator, and Crist Unit 6 may operate continuously, i.e., 8760 hrs/yr.
5. The manner, nature, volume and frequency of permitted emissions, applicable emissions limiting standards, if any, and allowable emissions are listed as per FAC Rule 17-210.300(2)(a):

| <u>Airborne Contaminant Emitted</u> | <u>FAC Rule</u> | <u>Allowable Emissions T/yr</u> |
|-------------------------------------|--------------------|----------------------------------|
| PM | 17-296.405(1)(b) | 1475 1 |
| SO ₂ | 17-296.405(1)(c)2c | 87035 2 |
| Objectionable Odors | 17-296.320(2) | None allowed off plant property, |
| VE | 17-296.405(1)(a) | 40% opacity 3 |

- 1 Based on steady-state operating parameters, application to construct and rule:
PM emissions shall not exceed 0.1 pounds per million Btu heat input.
- 2 Based on steady-state operating parameters, application to construct and rule:
SO₂ emissions shall not exceed 5.90 pounds per million Btu heat input.
- 3 Department order dated May 12, 1988.

6. Excess emissions as stated in FAC Rule 17-210.700 shall be allowed. The steady-state hourly emission rate allowable for PM listed in Specific Condition #5 shall not apply during soot-blowing or load changes. However, PM emissions shall not exceed an average of 0.3 lb/MMBtu heat input (equivalent to 1011 lb/hr allowable emissions - steady state) during the 3 hour excess emissions period allowed by 17-210.700 (ref. FAC rule 17-210.700(3)).

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AC17-234016
Date of Issue: October 7, 1993
Expiration Date: December 1, 1994

SPECIFIC CONDITIONS:

7. Excess emissions are defined as:

- A. Any six-minute average for opacity which exceeds the standard.
- B. Any 24-hour average for sulfur dioxide which exceeds the standard.

8. The Department shall be notified as soon as possible (by telephone) of excess emissions that are beyond the allowances of FAC Rule 17-210.700, such as:

A. Any soot blowing or load changes that cause excess visible emissions for a period longer than three hours, or that exceed 60 percent opacity (six minute average) more than four times in any one day.

B. Any malfunction that causes excess visible emissions for a period longer than two hours in any one day.

C. A 24-hour average of SO₂ emissions measured by the continuous monitor that exceeds the standard, or daily average SO₂ emissions measured by coal analysis (in the event the permittee chooses) that exceeds the standard.

Immediately upon notification of excess emissions that are beyond the allowances, the permittee shall take the necessary steps to determine the cause and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation with corrective action to avoid recurrence.

9. A log shall be maintained showing the duration, magnitude and cause of excess visible emissions, and of excess SO₂ emissions.

10. A quarterly report of excess emissions shall be submitted within 30 days following the end of each calendar quarter. The report shall consist of each individual exceedance of opacity or SO₂ emissions (specific Conditions 7 and 8) with duration, magnitude and cause. Any exceedance that is beyond the allowances of FAC Rule 17-210.700 shall be highlighted with note indicating compliance with specific condition 8. A continuous emissions monitor quarterly summary report shall be submitted for each CEM.

11. A maintenance log of the continuous monitoring system shall be kept showing time out of service, and calibrations and adjustments.

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506

Permit/Certification Number: AC17-234016

Date of Issue: October 7, 1993

Expiration Date: December 1, 1994

SPECIFIC CONDITIONS:

12. Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with the table below. Such tests shall be scheduled within 30 days after construction is completed. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.

| <u>Pollutant</u> | <u>Test Method</u> |
|------------------|----------------------------|
| PM | DEP method 1, 2, 3, and 17 |
| VE | DEP method 9 |

The VE test shall be conducted during one of the PM test runs. Test reports shall comply with F.A.C. Rule 17-297.570, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 17-297.340(2). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

13. Immediately upon notification of a particulate test report that fails to demonstrate compliance with the particulate emission limit of 0.1 pounds per million Btu heat input, the permittee shall take necessary steps to determine the cause of the test failure and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation and a schedule for retesting when the cause of the test failure has been determined and corrected.
14. Boilers No. 6 and 7 use a common stack. Visible emission violations from this stack shall be attributed to both boilers unless opacity meter results show the specific boiler causing the violation.
15. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standard of the Department (specific condition 5). A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emission standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the permittee has verified the problem or no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO₂ emission compliance by the temporary use of a spare SO₂ emission monitor. The spare SO₂ emission monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AC17-234016
Date of Issue: October 7, 1993
Expiration Date: December 1, 1994

SPECIFIC CONDITIONS:

16. The permittee shall develop and implement a QC program. As a minimum, the QC program must include written procedures which should describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. Calibration Drift determination and adjustment of CEMS.
3. Preventive maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling and analysis methods.
6. Program of corrective action for malfunctioning CEMS.

17. The applicant shall retain a Professional Engineer, registered in the State of Florida, for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to the permit application and associated documents. A Certificate of Completion [Form DEP 17-1.202(3) attached] shall be submitted with the compliance test results and appropriate fee as application for an operation permit. These are to be submitted within 75 days after completion of construction. The permittee shall obtain an operating permit for this source before the expiration of this construction permit if the permittee desires to continue operation.

18. All fugitive dust generated at this site shall be adequately controlled.

19. The permanent source identification number for this point source is 10PEN17004506. Please cite this number on all test reports and other correspondence specific to this permitted point source.

20. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 436-8364 during normal working hours.

Expiration Date:

Issued this 7th day of October,
1993.

December 1, 1994

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

October 5, 1994

M. L. Gilchrist
Manager of Fuel and Environmental Affairs
Gulf Power Company
Post Office Box 1151
Pensacola, Florida 32520-0328

Dear Mr. Gilchrist:

This letter is in response to a phone conversation between Armando Sarasua of our office and Dwaine Waters of your firm on August 19, 1994.

By this letter, air construction permit AC17-234016 for your new Unit 6 Electrostatic Precipitator, source I.D. Number 10PEN17004506, shall be modified by changing the second paragraph of Specific Condition 12 as follows.

From:

The VE test shall be conducted during one of the PM test runs. Test reports shall comply with F.A.C. Rule 62-297.570, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.340(2). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

To:

The VE test shall be conducted during one of the PM test runs. Continuous Emissions Monitor (transmissometer) readings may be substituted for a VE Method 9 test as per F.A.C. Rule 62-297.500 and table 297.330-1. Continuous opacity monitoring summaries of rolling six-minute averages covering the full time period spanned by each PM test run may be submitted in lieu of the visible emissions tests according to DER Method 9 conducted concurrently with one of the mass emission runs of each PM test. Test reports shall comply with F.A.C. Rule 62-297.570, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.340(2). Other test methods and alternate compliance procedures may be used only after prior Department approval has been obtained in writing.

And adding a third paragraph:

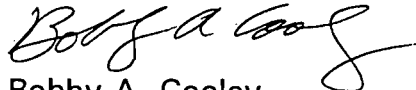
Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then

Page Two
Gulf Power AC17-234016 Amendment

operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.

This letter shall be attached to, and become a part of, air construction permit AC17-234016.

Sincerely,



Bobby A. Cooley
District Director

BAC:asc

cc: DARM

Memorandum

Florida Department of Environmental Protection

TO : Bobby A. Cooley
THROUGH : Ed K. Middleswart, P.E. *edm 10/5*
FROM : ~~Asst~~ Andy Allen, Armando I. Sarasua *AA*
DATE : September 23, 1994
SUBJECT: Evaluation Summary for Gulf Power Company, Crist Unit 6,
AC17-~~255834~~, source number 10PEN17004506

234016

We recommend modifying the construction permit to Gulf Power Company for Crist Unit 6. The construction permit was for the installation of the new Electrostatic Precipitator (ESP). This modification allows the use of Continuous Emissions Monitoring results during compliance testing in lieu of a VE method 9. Currently operating under AO17-171809, issued 6/6/90, expires 3/1/95.

Process Description The coal-fired power boiler (Crist No. 6) is used to supply steam for the generation of 320 MW of electricity. Fly ash particulate matter is electrostatically charged as it passes through the corona of the ESP. Electric forces attract the PM to the collecting plates. The plates are rapped periodically to loosen the collected PM. The PM slides down the plates and into a hopper. Collected fly ash PM and bottom ash generated by the combustion of fossil fuels are disposed of in an on-site permitted landfill.

Pollution Control Equipment Emissions of particulates are controlled by the new ESP, Wheelabrator model HaRDE. The new ESP has a PM removal efficiency of 99.6% at full load flow conditions of 1,325,820 ACFM. Emissions of sulfur dioxide are controlled by the sulfur content of the coal. Continuous emissions monitoring systems for opacity, sulfur dioxide, nitrogen oxides and oxygen are installed. The ESP and stack are shared by Crist Units 6 and 7.

Environmental Impact

| Airborne Contaminant Emitted | FAC Rule | Estimated Emissions | | Allowable Emissions | |
|------------------------------|--------------------|---------------------|-------|----------------------------------|-------|
| | | lbs/hr | T/yr | lb/hr | T/yr |
| PM | 17-296.405(1)(b) | 126 | 551 | 337 | 1475 |
| SO ₂ | 17-296.405(1)(c)2c | 9791 | 42855 | 19871 | 87035 |
| VOC | N/A | 10 | 43 | N/A | N/A |
| NO _x | N/A | 4378 | 19177 | N/A | N/A |
| CO | N/A | 55 | 241 | N/A | N/A |
| Pb | N/A | 2 | 8 | N/A | N/A |
| Objectionable Odors | 17-296.320(2) | N/A | N/A | None allowed off plant property. | |
| VE | 17-296.405 | N/A | N/A | Not more than 40% opacity | |

Applicable Rules & Regulations This source is regulated in accordance with FAC Rules shown above.

Compliance Monitoring Continuous VE and SO₂ emission monitoring 24-hour averages. Annual PM, SO₂, VOC, NO_x, CO and VE emissions testing.

Compliance History Steady State PM emissions test results were 0.006 lb/MMBtu (.10 lb/MMBtu allowable). Soot blowing PM emission test results were 0.01 lb/MMBtu (0.30 lb/MMBtu allowable).

AIS:asc



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794 • 904-436-8300

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary
Robert Kregel, Deputy Assistant Secretary



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794 • 904-436-8300

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary
Robert Kregel, Deputy Assistant Secretary

NOV 19 1990

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004507

Permit/Certification Number: A017-171806

Date of Issue:

JUN 6 1990

Expiration Date: March 1, 1995

County: Escambia

Latitude/Longitude: 30°33'57"N/87°13'29.5"W

Section/Township/Range: 25/1N/30W

Project: Crist Boiler #7

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of utility boiler (Crist #7) to supply steam for generation of 500 MW of electricity. This boiler is fueled with coal.

Emissions of particulates are controlled by an electro-static precipitator. Emissions of sulfur dioxide are controlled by the sulfur content of the coal. Continuous emissions monitoring system for opacity, sulfur dioxide, nitrogen oxides and oxygen is installed.

Located at Crist Plant, Governors Bayou, north of Pensacola.

The following specific conditions require timely action by the permittee during the life of this permit:

- Condition 20 Logging excess emissions (each occurrence)
- 21 Logging CEM maintenance (each occurrence)
- 22 Excess emissions report (quarterly)
- 24 Annual particulates test (prior to end of September)
- 25 QC Program (within 90 days after permit issuance)
- 27 Report of excess emissions, not allowed (each occurrence)
- 28 Report of particulate stack test exceedence (each occurrence)
- 30 Apply for permit renewal (prior to January 1, 1995)

Mr. M. L. Gilchrist
Manager of Fuel and Environmental Affairs
Gulf Power Company
P. O. Box 1151
Pensacola, Florida 32520

Dear Mr. Gilchrist:

This is in response to Gulf Power requests that Crist Boilers #4 and #5 prove compliance with the SO₂ emission standard with the continuous emissions monitor (CEM) in the same manner as agreed to for Crist Boilers #6 and #7.

By this letter permits A017-134882 and 134883 are modified as follows:

Condition 17 of each permit shall be amended to :

17. Sulfur dioxide emissions shall not exceed 5.90 pounds per million Btu heat input.

19. Excess emissions are defined as:

A. Any six minute average for opacity which exceeds the standard.

B. Any 24 hour average for sulfur dioxide which exceeds the standard.

Condition 22 of each permit shall be amended to:

22. A quarterly report of excess emissions shall be submitted within 30 days following the end of each calendar quarter. The report shall consist of each individual exceedance of opacity or SO₂ emissions (Specific Condition 19) with duration, magnitude and cause. Any exceedance that is beyond the allowances of F.A.C. Rule 17-2.250 shall be highlighted with note indicating compliance with Specific Condition 27 below.

Condition 27 through 31 shall be added to each permit:

27. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standard of the Department (Specific Condition 17). A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emission standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO₂ emission compliance by the temporary use of a spare SO₂ emission monitor. The spare SO₂ emission monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

Develop and implement a QC program. As a minimum the QC program must include written procedures which should describe in detail, complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. CD determination and adjustment of CEMS.
3. preventive maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling and analysis methods.

28. Excess emissions as stated in Florida Administrative Code (F.A.C.) Rule 17-2.250 shall be allowed.

29. The Department shall be notified as soon as possible (by telephone) of excess emissions that are beyond the allowances of F.A.C. Rule 17-2.250, such as:

- A. Any soot blowing or load changes that cause excess visible emissions for a period longer than three hours, or that exceed 60 percent opacity (six minute average) more than four times in any one day.
- B. Any malfunction that causes excess visible emissions for a period longer than two hours in any one day.

C. A 24-hour average of SO₂ emissions measured by the continuous monitor that exceeds the standard, or daily average SO₂ emissions measured by coal analysis (in the event the permittee chooses) that exceeds the standard.

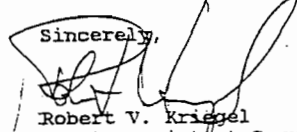
30. Immediately upon notification of excess emissions that are beyond the allowances, the permittee shall take the necessary steps to determine the cause and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation with corrective action to avoid recurrence.

31. An application to renew this permit shall be submitted prior to April 1, 1992.

Specific Conditions 15, 16, 18, 20, 21, 23, 24, 25 and 26 of each permit remain unchanged.

This letter shall be attached to and made a part of permits A017-134882 and 134883.

Sincerely,


Robert V. Krieger
Deputy Assistant Secretary

RVK:jpv

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004507
Permit/Certification Number: A017-171806
Date of Issue:

Expiration Date: March 1, 1995

GENERAL CONDITIONS:

14. 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 the 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.

SPECIFIC CONDITIONS:

15. The maximum allowable heat input is that heat input necessary to maintain electrical load output at 110 percent of the level at which the most recent successful particulate emissions compliance test was conducted. If the test was conducted at less than 90 percent of rated capacity of the unit, permittee may operate the unit at loads up to the rated capacity (500 megawatts) for purposes of preparation for testing for up to ten calendar days. The Department shall be advised in writing prior to each testing.

16. Particulate emissions shall not exceed 0.1 pounds per million Btu heat input.

17. Sulfur dioxide emissions shall not exceed 5.90 pounds per million Btu heat input.

18. Visible emissions shall not exceed 40 percent opacity.

19. Excess emissions are defined as:

- A. Any six minute average for opacity which exceeds the standard.
- B. Any 24 hour average for sulfur dioxide which exceeds the standard.

20. A log shall be maintained showing the:

- A. Duration of excess visible emissions and their causes.
- B. Duration of excess SO₂ emissions.

21. A maintenance log of the continuous monitoring system shall be kept showing:

- A. Time out of service.
- B. Calibrations and adjustments.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004507
Permit/Certification Number: A017-171806
Date of Issue:

Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

22. A quarterly report of excess emissions shall be submitted within 30 days following the end of each calendar quarter. The report shall consist of each individual exceedance of opacity or SO₂ emissions (Specific Conditions 19 and 20) with duration, magnitude and cause. Any exceedance that is beyond the allowances of FAC Rule 17-2.250 shall be highlighted with note indicating compliance with Specific Condition 27 below.

A continuous emission monitor quarterly summary report shall be submitted for each CEM.

23. Boilers #6 and #7 use a common stack. Visible emission violations from this stack shall be attributed to both boilers unless opacity meter results show the specific boiler causing the violation.

24. Particulate tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with EPA methods 1, 2, 3 and 17. Such tests shall be conducted once per year before the end of September. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.

25. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standard of the Department (Specific Condition 17). A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emission standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the permittee has verified the problem or no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO₂ emission compliance by the temporary use of a spare SO₂ emission monitor. The spare SO₂ emission monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

Develop and implement a QC program. As a minimum the QC program must include written procedures which should describe in detail, complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. CD determination and adjustment of CEMS.
3. Preventive maintenance of CEMS (including spare parts inventory).

PERMITTEE: I.D. Number: 10PEN17004507
Permit/Certification Number: A017-171806
Gulf Power Company Date of Issue:

Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

4. Data recording, calculations and reporting.
 5. Accuracy audit procedures including sampling and analysis methods.
 6. Program of corrective action for malfunctioning CEMS.
26. Excess emissions as stated in Florida Administrative Code Rule 17-2.250 shall be allowed.
27. The Department shall be notified as soon as possible (by telephone) of excess emissions that are beyond the allowances of FAC Rule 17-2.250, such as:
- A. Any soot blowing or load changes that cause excess visible emissions for a period longer than three hours, or that exceed 60 percent opacity (six minute average) more than four times in any one day.
 - B. Any malfunction that causes excess visible emissions for a period longer than two hours in any one day.
 - C. A 24-hour average of SO₂ emissions measured by the continuous monitor that exceeds the standard, or daily average SO₂ emissions measured by coal analysis (in the event the permittee chooses) that exceeds the standard.
- Immediately upon notification of excess emissions that are beyond the allowances, the permittee shall take the necessary steps to determine the cause and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation with corrective action to avoid recurrence.
28. Immediately upon notification of a particulate test report that fails to demonstrate compliance with the particulate emission limit of 0.1 pounds per million Btu heat input, the permittee shall take necessary steps to determine the cause of the test failure and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation and a schedule for retesting when the cause of the test failure has been determined and corrected.
29. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.
30. The permanent source identification number for this point source is 10PEN17004507. Please cite this number on all test reports and other correspondence specific to this permitted point source.
31. An application to renew this permit shall be submitted prior to January 1, 1995.

PERMITTEE: I.D. Number: 10PEN17004507
Permit/Certification Number: A017-171806
Gulf Power Company Date of Issue:

Expiration Date: March 1, 1995

SPECIFIC CONDITIONS:

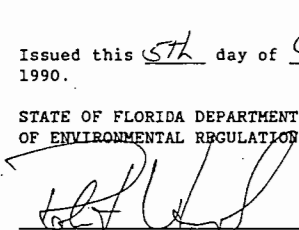
32. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 436-8364 during normal working hours.

Expiration date:

March 1, 1995

Issued this 5th day of June, 1990.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


ROBERT V. KRIEGEL
Deputy Assistant Secretary



Lawton Chiles
Governor

Florida Department of Environmental Protection

ENTERED

4 1993

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004508
Permit/Certification Number: AO17-234356
Date of Issue: July 30, 1993
Expiration Date: July 1, 1998
County: Escambia
Latitude/Longitude: 30°33'54.5"N/87°13'41.5"W
Project: Fly Ash Storage Silos

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of two fly ash silos. Fly ash collection systems from precipitators on Boilers 4, 5, 6 & 7 to three transfer tanks are totally enclosed with no emission points. Three blowers pneumatically convey dry fly ash to two silos at a maximum solids rate of 150 tons per hour to either or both silos. A majority of the solids (99.4%) settle by gravity upon entering the silo(s). The residual particulate emissions are controlled by a baghouse on each silo. Each baghouse is a Pulse Jet Fabric Filter, model #100-WMWC-420 (IIG) manufactured by Flex-Kleen. Dry fly ash will be transported in closed tanker trucks away from the site or conditioned (12-15% water added) fly ash will be transported to an approved landfill area on company property.

Located: Approximately 3 miles northeast of SR 292 and Ten Mile Road intersection, north of Pensacola.

Specific Condition No. 4 requires annual visible emissions (VE) testing due before the end of March.

Specific Condition No. 7 require submittal of annual operation reports.

Specific Condition No. 8 requires submittal of annual operation fee.

Specific Condition No. 9 requires submittal of permit renewal application by May 1, 1998.

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004508

Permit/Certification Number: AO17-234356

Date of Issue: July 30, 1993

Expiration Date: July 1, 1998

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. The maximum allowable operating rate is 150 tons of fly ash transported per hour. Compliance shall be demonstrated at an operating rate which typifies normal operation of the fly ash system. This operating rate may be lower than the maximum allowable operating rate. The Department may request that a special compliance test be conducted should test results not provide reasonable assurance that the source is in compliance.
3. Visible emissions shall not exceed 5% opacity.
4. Visible emissions tests are required to show continuing compliance with the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with DEP method 9 (on each baghouse, on each vent ; 2 vents per baghouse). Such tests shall be conducted annually at 12-month intervals (\pm two months) before the end of March. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.
5. All fugitive dust generated at this site shall be adequately controlled.
6. This permit prohibits the discharge of liquid effluents or contaminated run-off from holding ponds or from your facility unless appropriately permitted or exempted in accordance with State rules and regulations.
7. An annual operation report (DEP Form 17-210.900(4) attached) shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.
8. In accordance with F.A.C. Rule 17-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 17-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.
9. An application to renew this permit shall be submitted prior to May 1, 1998.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004508
Permit/Certification Number: AO17-234356
Date of Issue: July 30, 1993
Expiration Date: July 1, 1998

SPECIFIC CONDITIONS:

10. The permanent source identification number for this point source is 10PEN17004508. Please cite this number on all test reports and other correspondence specific to the permitted point source.

11. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 436-8364 during normal working hours.

Expiration Date:

Issued this 30th day of July, 1993.

July 1, 1998

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director



Lawton Chiles
Governor

Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004508
Permit/Certification Number: **AO17-234356**
Date of Issue: July 30, 1993
Expiration Date: July 1, 1998
County: Escambia
Latitude/Longitude: 30°33'54.5"N/87°13'41.5"W
Project: Fly Ash Storage Silos

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of two fly ash silos. Fly ash collection systems from precipitators on Boilers 4, 5, 6 & 7 to three transfer tanks are totally enclosed with no emission points. Three blowers pneumatically convey dry fly ash to two silos at a maximum solids rate of 150 tons per hour to either or both silos. A majority of the solids (99.4%) settle by gravity upon entering the silo(s). The residual particulate emissions are controlled by a baghouse on each silo. Each baghouse is a Pulse Jet Fabric Filter, model #100-WMWC-420 (IIG) manufactured by Flex-Kleen. Dry fly ash will be transported in closed tanker trucks away from the site or conditioned (12-15% water added) fly ash will be transported to an approved landfill area on company property.

Located: Approximately 3 miles northeast of SR 292 and Ten Mile Road intersection, north of Pensacola.

Specific Condition No. 4 requires annual visible emissions (VE) testing due before the end of March.

Specific Condition No. 7 require submittal of annual operation reports.

Specific Condition No. 8 requires submittal of annual operation fee.

Specific Condition No. 9 requires submittal of permit renewal application by May 1, 1998.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004508
Permit/Certification Number: AO17-234356
Date of Issue: July 30, 1993
Expiration Date: July 1, 1998

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. The maximum allowable operating rate is 150 tons of fly ash transported per hour. Compliance shall be demonstrated at an operating rate which typifies normal operation of the fly ash system. This operating rate may be lower than the maximum allowable operating rate. The Department may request that a special compliance test be conducted should test results not provide reasonable assurance that the source is in compliance.
3. Visible emissions shall not exceed 5% opacity.
4. Visible emissions tests are required to show continuing compliance with the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with DEP method 9 (on each baghouse, on each vent ; 2 vents per baghouse). Such tests shall be conducted annually at 12-month intervals (± two months) before the end of March. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.
5. All fugitive dust generated at this site shall be adequately controlled.
6. This permit prohibits the discharge of liquid effluents or contaminated run-off from holding ponds or from your facility unless appropriately permitted or exempted in accordance with State rules and regulations.
7. An annual operation report (DEP Form 17-210.900(4) attached) shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.
8. In accordance with F.A.C. Rule 17-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 17-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.
9. An application to renew this permit shall be submitted prior to May 1, 1998.

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004508
Permit/Certification Number: AO17-234356
Date of Issue: July 30, 1993
Expiration Date: July 1, 1998

SPECIFIC CONDITIONS:

10. The permanent source identification number for this point source is 10PEN17004508. Please cite this number on all test reports and other correspondence specific to the permitted point source.

11. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 436-8364 during normal working hours.

Expiration Date:

Issued this 30th day of July,
1993.

July 1, 1998

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794 • 904-436-8300

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary
Robert Knege, Deputy Assistant Secretary

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004508
Permit/Certification Number: A017-155526
Date of Issue: NOV 01 1988

Expiration Date: October 1, 1993
County: Escambia
Latitude/Longitude: 30°33'54.5"N/87°13'41.5"W
Section/Township/Range: 25/1N/30W
Project: Fly Ash Storage Silos

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown of the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Operate two fly ash storage silos. Fly ash collection systems from precipitators on boiler numbers 4, 5, 6 and 7 to three transfer tanks are totally enclosed with no emission points. Three blowers pneumatically convey dry fly ash to two silos at a maximum solids rate of 150 tons per hour to either or both silos. The majority of the solids (99.4%) settles by gravity upon entering the silo; the residual particulates are controlled by a baghouse on each silo. Each baghouse is a Pulse Jet Fabric Filter - Model #100 - WMWC - 420 (IIG) manufactured by Flex-Kleen. Dry fly ash will be transported in closed tanker trucks away from the site or conditioned (12-15% water added) fly ash will be transported to an approved landfill area on company property.

Located: approximately 3 miles northeast of the intersection of State Road 292 and Ten Mile Road north of Pensacola.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004508
Permit/Certification Number: A017-155526
Date of Issue: NOV 01 1988
Expiration Date: October 1, 1993

GENERAL CONDITIONS:

14. 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 submitted or corrected promptly.

SPECIFIC CONDITIONS:

15. The maximum allowable operating rate is 150 tons of fly ash transported per hour. Compliance shall be demonstrated at an operating rate which typifies normal operation of the fly ash system. This operating rate may be lower than the maximum allowable operating rate. Should the Department feel that the test results do not provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate, the Department may request that a visible emissions test be conducted at a higher operating rate up to the maximum allowable operating rate.
16. Visible emissions shall not exceed 5% opacity. This is in accordance with Florida Administrative Code Rule 17-2.700(3)(d) which allows waiver of particulate compliance stack testing upon minor particulate sources equipped with a baghouse, and the specification of the alternate standard of 5% opacity.
17. Visible emissions tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with EPA method 9 on each of four emission points. Such tests shall be conducted once per year before the end of June. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.
18. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.
19. All fugitive dust generated at this site shall be adequately controlled.
20. An application to renew this permit shall be submitted prior to August 1, 1993.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004508
Permit/Certification Number: A017-155526
Date of Issue: NOV 01 1988
Expiration Date: October 1, 1993

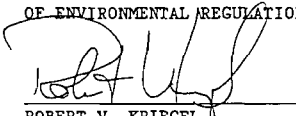
SPECIFIC CONDITIONS:

21. The permanent source identification number for this point source is 10PEN17004508. Please cite this number on all test reports and other correspondence specific to this permitted point source.

Expiration date:
October 1, 1993

Issued this 14 day of Nov,
1988.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


ROBERT V. KRIEGEL
Deputy Assistant Secretary