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May 5, 1998

Ms. Katrina Tew
Electric & Gas Division
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 980345, Gulf Power Co. petition for cost recovery for low Nox burners at Crist Units 4 & 5

Dear Ms. Tew:

LEAF has filed as an interested party in this docket. We are very concerned about appropriateness of spending almost a million dollars now for minimal pollution control when Gulf may have to install additional or different pollution control equipment in the near future.

Gulf proposes to install low NOx burners tips at the two units, constructed in 1959 and 1961, respectively. The units have expected retirement dates of 2014 and 2016, respectively. The half-measures being taken by Gulf at units that it proposes to operate for almost another twenty years are minimal efforts at future environmental compliance. The area in which the plant is located, near Pensacola, is predicted to be designated non-attainment for ozone because of recent changes to EPA regulations. NOx emissions are a primary component of ozone and that designation may require further or different compliance by Gulf.

Preliminary research by LEAF reveals that Gulf could well afford to install selective catalytic reduction (SCR) technology on those units and still operate them at or below the cost of new plants. Low NOx burners only reduce emissions by about half. Crist is one of the dirtiest plants in the state. In 1997, the plant as a whole emitted over 10,300 tons of NOx; over 5 pounds per megawatt hour. Units 4 and 5 were responsible for over 2300 tons of NOx in 1997. SCR would reduce emissions by between 80-90%.

The cost-benefit of installing SCR rather than low NOx burners should be thoroughly reviewed by staff before recommending any course of action to the Commission.

Sincerely,



Gail Kamaras, Director
Energy Advocacy Program

c: Susan Cranmer
Jeff Stone, Esq.
Howard Rhoades, DEP

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6000

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BUREAU OF
AIR REGULATION



December 15, 1997

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Dear Mr. Sheplak:

RE: Plant Crist Title V Permit Comments:
Draft Permit No: 0330045-001-AV

Attached, please find Gulf Power's second round of comments regarding the Draft Title V Permit (0330045-001-AV) issued on October 6, 1997 for the Crist Electric Generating Plant.

Please note that there has been an address change for Gulf Power Corporate Office to "One Energy Place, Pensacola, Fl 32520-0328" and the area code for all of Gulf Power locations has changed to (850). In addition to the area code change, Plant Crist had a telephone change to 850.429.5900. Please make these changes to your telephone directory for Gulf Power contact persons.

If you have any questions or need further information regarding our Title V comments, please call me at (850) 444.6527.

Sincerely,



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

cc: Robert G. Moore., Gulf Power Company
James O Vick, Gulf Power Company
J. W. Martin, Gulf Power Company
John Dominey, Gulf Power Company
Danny Herrin, Southern Company Services

**GULF POWER COMPANY TITLE V PERMIT COMMENTS
CRIST ELECTRIC GENERATING PLANT
Proposed Permit No.: 0330045-001-AV
December 15, 1997**

I. NEW COMMENTS:

Gulf Power December 15, 1997 Comment: General Comment : FDEP's cover letter to Ms. Yolanda Adams (EPA) dated November 14, 1997: Letter should not have the following persons copied on Gulf Power Title V permitting activity. Gulf Power requests these persons be removed from future Gulf Power Title V correspondences.

Mr. Rob McGarrah, City of Tallahassee
Mr. Karl Bauer, P.E., City of Tallahassee
Mr. Darrell Graziani, P.E., Foster-Wheeler
Mr. Gerry Neubauer, DEP, Northwest District Branch Office
Hamilton "Buck" Owen, DEP, Office of Siting Coordination

Gulf Power December 15, 1997 Comment: A.6/B.6/C.6 Visible Emissions – Soot Blowing & Load Change: Because Capacity is now defined as "heat input", Gulf Power specifically requests a notation to be made that for the purposes of A.6/B.6/C.6 that reference be made that load change is determined by a generation MW change and not heat input. It would be impossible to track heat input for the purposes of determining the load change exemption.

II. NEW COMMENTS ON EXISTING ISSUES:

SECTION I. Subsection A:

1. Gulf Power October 28, 197 Comment:

Page 2 Facility Description. In the third paragraph, it should be added that the permitting notes are not "enforceable" permit conditions to help clarify that not only is the purpose informational only, but that the notes are not intended to be enforced.

FDEP November 14, 1997 Response:

The Department feels that the intent of this statement is clear as it is written. If the permitting notes are not to be considered permit conditions, then they certainly can not be enforced. For consistency with permits that have already been issued, no change will be made to this statement.

Gulf Power December 15, 1997 Comment: Gulf accepts FDEP response.

SECTION II. Facility-wide Conditions

2. Gulf Power October 28, 1997 Comment:

Page 4 Condition 8. Reasonable Precautions to Prevent Unconfined Particulate Matter.

General Comment: At a meeting with the FCG, Department representatives agreed to add a permitting note to conditions such as this one stating that this more specific condition implements and effectively supersedes Condition 57 under Attachment TV-1 (the general, canned conditions) which is basically a quote from Rule 62-296.320(4)(c), F.A.C.

FDEP November 14, 1997 Response:

The following Permitting Note will be added after Condition 8:

{Permitting Note: Condition No. 8 presents the reasonable precautions to be implemented in accordance with Rule 62-296.320(4)(c)2, F.A.C., in lieu of the requirements of Condition No. 57 of Appendix TV-1.}

Gulf Power December 15, 1997 Comment: Gulf Power accepts FDEP response.

SECTION III. Subsection A:

3. Gulf Power October 28, 1997 Comment:

Page 9 A 1. Permitted Capacity. Lists permitted capacities of emissions unit numbers 001, 002 and 003.

Comment: Add notation that permitted capacity can not be accurately monitored or determined by use of continuous emission monitoring systems installed or operated pursuant to 40 CFR Part 75.

FDEP November 14, 1997 Response:

The requested comment is not needed as Condition A.15. requires that "The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data

are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.”

As a result of this comment, no change will be made.

Gulf Power December 15, 1997 Response: Gulf Power accepts this response with understanding that comments under Condition 15 can be amended to include that Fuel Sampling & Analysis is the only compliance method used to determine permitted capacity limits.

4. Gulf Power October 28, 1997 Comment:

Page 9 A.4 Hours of Operation. Requires Units 1-2-3 to maintain an operations log available for Department inspection that documents the total hours of annual operation, including a detailed account of hours operated on each of the allowable fuels. 62-213.440 and 62-210.200(PTE).

Comment: Unit(s) should not be required to have a continuous log of operations. Requirement does not note if this is a daily, hourly, monthly or annual log. Compliance to applicable standards are through vendor fuel oil analysis or generally exempt from annual visible emissions and particulate testing by operating less than 400 hour per year on fuel oil. The current reporting under the AOR is all that should be required.

FDEP November 14, 1997 Response:

Rule 62-213.440, F.A.C. requires Title V permits to include “...operational requirements and limitations that assure compliance with all applicable requirements...” Without the log book documentation, an annual claim on the AOR is not easily supportable and would not meet the requirements of Rule 62-213.440, F.A.C. A specification to daily, hourly, monthly, etc. is not needed as a detailed account of all fuels used is not time specific.

As a result of this comment, no change will be made.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

5. Gulf Power October 28, 1997 Comment:

Page 10 A. 10. Sulfur Dioxide - Sulfur Content. Outlines compliance method for liquid fuel.

Comment: Can not determine applicability of rule cite 62-213.440, F.A.C. The correct citation should be the applicant’s request, rather than Rule 21-213.440, F.A.C.

FDEP November 14, 1997 Response:

This limit was suggested by the Department as a way to assure compliance with Condition A.9. and was agreed to by Gulf Power Company. As a result, it would be acceptable to include the citing “at applicant’s request” in addition to the reference to Rule 62-213.440, F.A.C., but not instead of.

As a result of this comment, **Condition A.10.** is changed:

From:

A.10. Sulfur Dioxide - Sulfur Content. In order to ensure continuous compliance with the liquid fuel sulfur limit specified in condition **A.9.**, the liquid fuel sulfur content shall not exceed 1.8 percent, by weight, as measured by applicable test methods.
[Rule 62-213.440, F.A.C.]

To:

A.10. Sulfur Dioxide - Sulfur Content. In order to ensure continuous compliance with the liquid fuel sulfur limit specified in condition **A.9.**, the liquid fuel sulfur content shall not exceed 1.8 percent, by weight, as measured by applicable test methods.
[Rule 62-213.440, F.A.C.; and, Applicant's Request.]

Gulf Power December 15, 1997 Comment: Gulf Power accepts FDEP Response.

6. Gulf Power October 28, 1997 Comment:

Page 11 Monitoring of Operations. Permitting note stating that these units (Crist 1-2-3) meet Acid Rain Phase II requirements having continuous emission monitors installed for NOx, CO2 and stack gas flow.

Comment: Crist 1-2-3 meet Acid Rain Phase II 40 CFR Part 75 CEMs rules by Appendix D methods for SO2 and flow. NOx emissions monitored by use of a continuous emission monitor.

FDEP November 14, 1997 Response:

The permitting note is for informational purposes only. Since it is not entirely correct it will be deleted from the permit.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with removal of condition. Gulf Power accepts FDEP response.

7. Gulf Power October 28, 1997 Comment:

Page 11 A.15 Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter and SO2 is an annual 3 run hourly test. It should be noted that heat input (MMBtu/hr) for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/MMBtu) can be determined by the F-factor method as outlined in A.19 during this test. SO2 process variables are determined by vendor fuel analysis.

FDEP November 14, 1997 Response:

Condition A.15. is a general requirement pertaining to compliance testing. It establishes the requirement for maintaining the necessary equipment for determining all variable associated with the compliance if they are needed for determination of compliance. If no additional variables are needed for a particular test, then no additional equipment is needed to be maintained.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power doesn't accept the FDEP response. Gulf Power believes specific methods need to be outlined in this condition so environmental inspectors and general public interest know how compliance is determined. It should be clear that this requirement applies only to the demonstration period of compliance which for particulate matter and SO₂ is an annual 3 run hourly test. It should be noted that heat input (MMBtu/hr) for capacity purposes is to be determined only by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/MMBtu) shall be determined by the EPA F-factor method as outlined in A.19 during the annual test. SO₂ process variables (MMBtu/hr) are to be determined by vendor fuel oil analysis or Company fuel analysis procedures as outlined in Condition C.25 Fuel Sampling and Analysis.

8. Gulf Power October 28, 1997 Comment:

Page 11 A.15 Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated, calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. Rule 62-297.310(5)

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO₂ compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing.

FDEP November 14, 1997 Response:

If any of the referenced equipment is needed for determining missing variables, calibration shall be sufficiently demonstrated prior to its use.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 comment: Gulf Power doesn't accept the FDEP response. Gulf Power believes the permit condition should be clear to its meaning. Gulf Power suggests the following be added to the condition: This requirement applies to equipment used during compliance testing. Equipment used for SO₂ compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period.

9. Gulf Power October 28, 1997 Comment:

Page 13 A.22 Frequency of Compliance Test. (a) General Compliance Testing. 2. Requires annual particulate test for units that soot blow during normal unit operation, except for fossil fuel steam generators that do not burn liquid and/or solid fuel for more than 400 hours other than startup.

Comment: Add other than startup or shutdown operations.

FDEP November 14, 1997 Response:

Condition A.22.(a)2. is a direct quote of Rule 62-297.310(7)(a)2., F.A.C. Since the Rule language does not include the words "shutdown operations", they may not be added to the permit.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 comment: Gulf Power accepts the FDEP response, but will pursue clarification of this rule in future Title V Permit Simplification Rulemaking proceedings.

10. Gulf Power October 28, 1997 Comment:

Page 13 A.22. Frequency of Compliance Test. (a) General Compliance Testing. 3. Requires submission of emission compliance test results for any emissions unit that , during the year prior to renewal: b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.

Comment: Add other than during startup/shutdown. Also, the Department should add at the beginning of the sentence: "Except as otherwise provided in this permit..." See similar language in rule.

FDEP November 14, 1997 Response:

Condition A.22.(a)3. is a direct quote of Rule 62-297.310(7)(a)3., F.A.C. Since the Rule language does not include the words "other than during startup/shutdown", they may not be added to the permit.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 comment: Gulf Power accepts the FDEP response, but will pursue clarification of this rule in future Title V Permit Simplification Rulemaking proceedings.

11. Gulf Power October 28, 1997 Comment:

Page 13. A.22 Frequency of Compliance Test. (a) General Compliance Testing. 4. Requires a formal compliance test for a. Visible emissions, if there is an applicable standard.

Comment: Add reference to FCG exemption letter dated January 28, 1997 noting no visible emissions tests are required for units that burned liquid and/or solid fuel for a total of no more than 400 hours other than during startup/shutdown.

FDEP November 14, 1997 Response:

The requested exemption is already addressed in Condition A.28. For clarity, a cross reference to Condition A.28. will be added to Condition A. 22.(a)4.a.

As a result of this comment, **Condition A. 22.(a)4.a.** is changed:

From:

- a. Visible emissions, if there is an applicable standard;

To:

- a. Visible emissions, if there is an applicable standard (See **Condition A.27.**);

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

12. Gulf Power October 28, 1997 Comment:

Page 14 A.22 Frequency of Compliance Test. (a) General Compliance Testing. 5. Requires an annual compliance test for particulate matter emissions for any fuel burning emissions unit that does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.

Comment: Add other than during startup or shutdown.

FDEP November 14, 1997 Response:

Condition A.22.(a)5. is a direct quote of Rule 62-297.310(7)(a)5., F.A.C. Since the Rule language does not include the words "other than during startup or shutdown", they may not be added to the permit.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 comment: Gulf Power accepts the FDEP response, but will pursue clarification of this rule in future Title V Permit Simplification Rulemaking proceedings.

13. Gulf Power October 28, 1997 Comment:

Page 18 A.27. Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter and SO2 is an annual 3 run hourly test. It should be noted that heat input (MMBtu/hr) for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/MMBtu) can be determined by the F-factor method

as outlined in A.19 during this test. SO2 process variables are determined by vendor fuel analysis. **Same comment as A.15 above. Delete Condition A.27(a) Required Equipment.**

FDEP November 14, 1997 Response:

Condition A.27. is an inadvertent duplicate of Condition A.15., it will be deleted and the subsequent conditions will be renumbered accordingly.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with FDEP response.

14. Gulf Power October 28, 1997 Comment:

Page 18 A.27 Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated, calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. Rule 62-297.310(5)

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO2 compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing. **Same comment as item A.15 above. Delete Condition A.27 (b) Accuracy of Equipment.**

FDEP November 14, 1997 Response:

Same as response 13.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with FDEP response.

15. Gulf Power October 28, 1997 Comment:

Page 18 A.28. Visible Emissions Testing - Annual. Requires annual emissions compliance testing for visible emissions unless these units burn b. gaseous fuels in combination with any amount of liquid fuel for less than 400 hours per year. Rule 62-297.310(7)(a)4.

Comment: Add other than during startup and shutdown per year.

Page 18. A.28. Visible Emissions Testing - Annual. Requires annual emissions compliance testing for visible emissions unless these units burn c. only liquid fuel(s) for less than 400 hours per year. Rule 62-297.310(7)(a)4

Comment: Add other than during startup and shutdown per year.

FDEP November 14, 1997 Response:

The waiver from annual visible emissions compliance testing that is granted by this permit is for emissions units that burn liquid fuel for less than 400 hours per year, inclusive of start-up and shut down.

As a result of these comments, no changes will be made.

Gulf Power December 15, 1997 comment: Gulf Power accepts the FDEP response, but will pursue clarification of this rule in future Title V Permit Simplification Rulemaking proceedings.

16. Gulf Power October 28, 1997 Comment:

Page 18 A.29. Particulate Matter Testing - Annual and Permit Renewal. Requires annual and permit renewal emissions compliance testing for particulate matter unless these units burn b. gaseous fuels in combination with any amount of liquid fuel for less than 400 hours per year. Rule 62-297.310(7)(a)3.&5.

Comment: Add other than during startup and shutdown per year.

Page 18. A.29. Particulate Matter Testing - Annual and Permit Renewal. Requires annual emissions and permit renewal emissions compliance testing for particulate matter unless these units burn c. only liquid fuel(s) for less than 400 hours per year. Rule 62-297.310(7)(a)3.&5. and ASP # 97-B-01.

Comment: Add other than during startup and shutdown per year.

FDEP November 14, 1997 Response:

ASP # 97-B-01 states, in part, that:

1. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours; and,

4. In renewing an air operation permit, the Department shall not require submission of particulate matter emission compliance test results for any fossil fuel steam generator emissions unit that burned liquid and/or solid fuel for a total of no more than 400 hours during the year prior to renewal.

The waiver granted by ASP #97-B-01 from annual particulate matter emission compliance testing excludes hours attributable to startup from the 400 hour per year limit, but includes the startup hours in the 400 hour per year limit for purposes of renewal.

As a result of this comment, **Condition A.28.** (previously A.29.) is changed:

From:

A.28. Particulate Matter Testing - Annual and Permit Renewal. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or,
- c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

To:

A.28. Particulate Matter Testing - Annual. Annual compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s), other than during startup, for no more than 400 hours per year; or,
- c. only liquid fuel(s), other than during startup, for no more than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

A.29. Particulate Matter Testing - Permit Renewal. Permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for no more than 400 hours per year; or,
- c. only liquid fuel(s) for no more than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

The remainder of the conditions will be renumbered accordingly.

Gulf Power December 15, 1997 comment: Gulf Power accepts the FDEP response, but will pursue clarification of this rule in future Title V Permit Simplification Rulemaking proceedings.

17. Gulf Power October 28, 1997 Comment:

Page 18 A.30. Recordkeeping and Reporting Requirements. Requires owner or operator to maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. Rule 62-214.440 and 62-4.070(3) F.A.C.

Comments: Unit(s) should not be required to maintain continuous records of fuel consumption if the unit accepts a percent sulfur restriction for sulfur dioxide compliance for liquid fuels or burns gas. Liquid fuel is monitored by as-received vendor fuel analysis. See condition A.20. Only annual reporting under the Annual Operating Report should be required.

FDEP November 14, 1997 Response:

This condition supports **Condition A.4.** See comment and response number 4., above.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

18. Gulf Power October 28, 1997 Comment:

Page 18 A.31. Recordkeeping and Reporting Outline notification and reporting requirements in case of excess emissions resulting from malfunctions.

Comment: It should be noted that notification to the Department is required after the two hour daily exemption has occurred and not from any malfunction.

FDEP November 14, 1997 Response:

The Department does not agree with this interpretation.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power doesn't agree with FDEP response and will seek clarification through a FDEP Guidance Memo and/or future Title V Permit Simplification rulemaking.

19. Gulf Power October 28, 1997 Comment:

Page 20 A.34. e Testing Requirements: Outline testing requirements for used oil.

Comment: Used oil for which the operator has generator knowledge having no possibility of contamination by PCB should not be required to test for PCBs.

FDEP November 14, 1997 Response:

The claim must be documented and verifiable in order to avoid testing.

As a result of this comment, **Condition A.34.e.** is changed:

From:

- e. Testing Requirements: The owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs.

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

To:

- e. Testing Requirements: For each batch of used oil to be burned, the owner or operator must be able to demonstrate that the used oil qualifies as on-specification used oil and that the PCB content is less than 50 ppm.

The requirements of this demonstration are governed by the following federal regulations:

Analysis of used oil fuel. A generator, transporter, processor/ re-refiner, or burner may determine that used oil that is to be burned for energy recovery meets the fuel specifications of Sec. 279.11 by performing analyses or obtaining copies of analyses or other information documenting that the used oil fuel meets the specifications.

[40 CFR 279.72(a)]

Testing of used oil fuel. Used oil to be burned for energy recovery is presumed to contain quantifiable levels (2 ppm) of PCB unless the marketer obtains analyses (testing) or other information that the used oil fuel does not contain quantifiable levels of PCBs.

- (i) The person who first claims that a used oil fuel does not contain quantifiable level (2 ppm) PCB must obtain analyses or other information to support that claim.
- (ii) Testing to determine the PCB concentration in used oil may be conducted on individual samples, or in accordance with the testing procedures described in Sec. 761.60(g)(2). However, for purposes of this part, if any PCBs at a concentration of 50 ppm or greater have been added to the container or equipment, then the total container contents must be considered as having a PCB concentration of 50 ppm or greater for purposes of complying with the disposal requirements of this part.
- (iii) Other information documenting that the used oil fuel does not contain quantifiable levels (2 ppm) of PCBs may consist of either personal, special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the oil contains no detectable PCBs.

[40 CFR 761.20(e)(2)]

When testing is required, the owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs.

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

20. Gulf Power October 28, 1997 Comment:

Page 21 A.34. f Record Keeping Requirements: The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (1): Condition requires the source to maintain records of quantities of used oil generated that is transferred into the approved AST (above ground storage tank) at the source.

Comments: Current procedures allow the AST to be batch-tested once it is filled and that quantity burned. It is overly burdensome to maintain records of each volume of oil added to the AST during any period. Additionally, there is no regulatory requirement for records to be completed by any specified date, particularly arbitrarily derived dates.

Page 21 A.34. f. Record Keeping Requirements. The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (2): Requires records of used oil management to completed by no later than the fifteenth day of the succeeding month.

Comment: There is no regulatory requirement for any specified date for record keeping completion purposes. The Department's language in this part of the proposed condition regarding consecutive 12 month periods is not consistent with earlier provisions which talk about a calendar year limitation on the total quantity of used oil that can be burned. Delete this requirement.

FDEP November 14, 1997 Response:

Your interpretation of batch testing is correct, as long as you are not blending in order to meet the limits. The requirement to complete records within 15 days of the end of a given month will be deleted. Keep in mind, however, that it is your responsibility to be able to produce these records upon Department request. The requirement to maintain records of used oil usage during the previous 12 month period will be deleted. Used oil records should be maintained on a calendar year basis.

As a result of this comment, **Condition A.34.f.** is changed:

From:

- f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
- (1) The gallons of on-specification used oil generated and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
 - (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
 - (3) Results of the analyses required above.
- [40 CFR 279.61 and 40 CFR 761.20(e)]

To:

- f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
- (1) The gallons of on-specification used oil generated and burned each month.
 - (2) Results of the analyses required above.
 - (3) Other information, besides testing, used to make a claim that the used oil meets the requirements of on-specification used oil or that the used oil contains less than 50 ppm of PCBs.
- [40 CFR 279.72(b), 40 CFR 279.74(b) and 40 CFR 761.20(e)]

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

21. Gulf Power October 28, 1997 Comment:

Page 21 A.34. g. Reporting Requirements. Requires the source to report to the Northwest District office within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

Comment: There is no current regulatory requirement for quarterly reporting of used oil activities to the District. Current reporting through the Annual Operating Reporting should be adequate to meet monitoring of on-specification used oil activities.

NOTE: Cite [40 CFR 761.20(e)] is not applicable to these conditions; this cite addresses marking requirements for PCB containers.

FDEP November 14, 1997 Response:

The quarterly reporting requirement will be deleted. The reference to 40 CFR 761.20(e) does apply, sections e. and f., above, reflect testing and record keeping requirements found in 40 CFR 761.20(e).

As a result of this comment, **Condition A.34.g.** is changed:

From:

- g. Reporting Requirements: The owner or operator shall submit to the Northwest District office, within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

The owner or operator shall submit, with the Annual Operation Report form, the analytical results and the total amount of on-specification used oil burned during the previous calendar year.

To:

- g. Reporting Requirements: The owner or operator shall submit, with the Annual Operation Report form, the analytical results and the total amount of on-specification used oil burned during the previous calendar year.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with the FDEP response.

Subsection B:

22. Gulf Power October 28, 1997 Comment:

Page 22. B.1 Permitted Capacity. Lists permitted capacities of emissions unit numbers 004 and 005.

Comment: Add notation that permitted capacity can not be accurately monitored or determined by use of continuous emission monitoring systems installed or operated pursuant to 40 CFR Part 75.

FDEP November 14, 1997 Response:

The requested comment is not needed as Condition B.17. requires that "The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards."

As a result of this comment, no change will be made.

Gulf Power December 15, 1997 Response: Gulf Power accepts this response with understanding that comments under Condition B. 17 can be amended to include that Fuel Sampling & Analysis is the only compliance method used to determine permitted capacity limits.

23. Gulf Power October 28, 1997 Comment:

Page 23 B.4 Hours of Operation. Requires Units 4 & 5 to maintain an operations log available for Department inspection that documents the total hours of annual operation, including a detailed account of hours operated on each of the allowable fuels. 62-213.440 and 62-210.200(PTE).

Comment: Unit(s) should not have to keep a continuous log of operations. Requirement does not note if this is a daily, hourly, monthly or annual log. These units maintain compliance to SO₂ standards through CEMS. The current reporting under the AOR is all that should be required.

FDEP November 14, 1997 Response:

Rule 62-213.440, F.A.C. requires Title V permits to include "...operational requirements and limitations that assure compliance with all applicable requirements,..." Without the log book documentation, an annual claim on the AOR is not easily supportable and would not meet the requirements of Rule 62-213.440, F.A.C. A specification to daily, hourly, monthly, etc. is not needed as a detailed account of all fuels used is not time specific.

As a result of this comment, no change will be made.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

24. Gulf Power October 28, 1997 Comment:

Page 25 B.17 Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter is an annual 3 run hourly test and SO₂ is a 24 hour daily average using CEMS data. It should be noted that heat input for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/MMBtu) can be determined by the F-factor method outlined in B.21. during the test. Daily (24 hour) SO₂ emission rates shall be determined by CEM monitors on a real time basis outlined in B.23.

FDEP November 14, 1997 Response:

Condition B.17. is a general requirement pertaining to compliance testing. It establishes the requirement for maintaining the necessary equipment for determining all variable associated with the compliance if they are needed for determination of compliance. If no additional variables are needed for a particular test, then no additional equipment is needed to be maintained.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power doesn't not accept FDEP response. Gulf Power believes specific methods need to be outlined in this condition so environmental inspectors and general public interest know how compliance is determined. It should be clear that this requirement applies only to the demonstration period of compliance which for particulate matter and SO₂ is an annual 3 run hourly test. It should be noted that heat input (MMBtu/hr) for capacity purposes is to be determined only by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/MMBtu) shall be determined by the EPA F-factor method as outlined in A.19 during the annual test. SO₂ process variables (MMBtu/hr) are to be determined by vendor fuel oil analysis or Company fuel analysis procedures as outlined in Condition C.25 Fuel Sampling and Analysis.

25. Gulf Power October 28, 1997 Comment:

Page 25 B.17 Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated, calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. Rule 62-297.310(5)

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO₂ compliance has QA/QC procedures associated with the acid rain program and meet QC provisions in B.23. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing.

FDEP November 14, 1997 Response:

If any of the referenced equipment is needed for determining missing variables, calibration shall be sufficiently demonstrated prior to its use.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power doesn't accept the FDEP response. Gulf Power believes the permit condition should be clear to its meaning. Gulf Power suggests the following be added to the condition: This requirement applies to equipment used during compliance testing. Equipment used for SO₂ compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period.

26. Gulf Power October 28, 1997 Comment:

Page 25 B.18 Annual Tests Required. Requires annual tests for SO₂ and PM.

Comment: Annual testing for SO₂ should not be required since CEMs are used for compliance.

FDEP November 14, 1997 Response:

The SO₂ CEM satisfies the monitoring requirement contained in Rule 62-296.405(1)(f)1.b., F.A.C. Rule 62-296.405(1)(e)3., F.A.C., requires a method 6, 6A, 6B or 6C test. Rule 62-297.310(7)(a)4., F.A.C., requires the test each federal fiscal year.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

27. Gulf Power October 28, 1997 Comment:

Page 25 B.19. Visible Emissions Notes permittee has elected to utilize a transmissometer (opacity meter) for demonstrating compliance with the visible emissions limit.

Comment: Gulf Power's continuous emission monitors for opacity only records and reports opacity in block 6 minute intervals.

FDEP November 14, 1997 Response:

This is consistent with the rule requirements.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with the FDEP response but requests the 6 minute monitoring interval to be noted in the permit condition. This information is needed to clarify the monitoring timeframe for environmental inspectors and public interest persons.

28. Gulf Power October 28, 1997 Comment:

Page 27 B.23. Monitoring of Operations. Requires continuous SO₂ emission monitoring using 24 hour averages with standards of the Department (See Specific Condition 4)

Comment: Specific Condition 4 is Hours of Operation. The correct reference should be Specific Condition B.9 Sulfur Dioxide - Solid Fuel and B.10 Sulfur Dioxide - Liquid Fuel. Also, Delete "immediately initiate as-fired fuel sampling" to language outlined in the existing permit, i.e. 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.

FDEP November 14, 1997 Response:

Specific Condition 4 was a left over reference from the existing operation permit, it should say "see Conditions B.9. - B.11.". It appears that a 36 hour delay in implementing fuel sampling may conflict with the upcoming CAM rule, however, we will continue to follow the condition contained in the existing operation permit until such time that the CAM rule is implemented. At that time, the permit will be amended accordingly.

As a result of this comment, Condition B.23. is changed:

From:

B.23. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standards 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 interrupted, the permittee shall immediately initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emissions standard. As-fired fuel sampling shall continue until such time as valid data capture is restored. In lieu of as-fired fuel sampling, the permittee may elect to demonstrate SO₂ emissions compliance by the temporary use of a spare SO₂ emissions monitor. The spare, previously calibrated, SO₂ emissions monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

A quality control (QC) program must be maintained. At a minimum, the QC program must include written procedures which shall describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. Calibration Drift (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.

[Rules 62-213.440, 62-204.800(7)(e)5 and 62-296.405(1)(f)1.b., F.A.C.; and, AO17-211303.]

To:

B.23. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standards of the Department (see **Conditions B.9. - B.11.**). 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 interrupted, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emissions 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. As-fired fuel sampling shall continue until such time as valid data capture is restored. In lieu of as-fired fuel sampling, the permittee may elect to demonstrate SO₂ emissions compliance by the temporary use of a spare SO₂ emissions monitor. The spare, previously calibrated, SO₂ emissions monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

A quality control (QC) program must be maintained. At a minimum, the QC program must include written procedures which shall describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. Calibration Drift (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.

[Rules 62-213.440, 62-204.800(7)(e)5 and 62-296.405(1)(f)1.b., F.A.C.; and, AO17-211303.]

Gulf Power December 15, 1997 Comment: Gulf Power agrees with the FDEP response.

29. Gulf Power October 28, 1997 Comment:

Page 27 B.25. Fuel Sampling and Analysis. Outline various ASTM procedures for use to demonstrate compliance with the sulfur dioxide standard in the event that the SO₂ CEM is not able to capture valid data.

Comment: Section (a) and (c) should be deleted and replaced with the provision that the source has accepted a sulfur percent limit for fuel oil and that limit will be verified with a fuel analysis provided by the vendor upon each fuel delivery. Additionally, references to the density of the fuel oil in Section (e) should be deleted. Added to Section (f), it should be noted that if fuel oil is consumed during a day when these procedures are used that the latest fuel oil analysis will be used to calculate the SO₂ emission rate.

FDEP November 14, 1997 Response:

Sections (a) and (c) require the permittee to "Determine and record...". This does not say to test and record. As long as you are able to demonstrate that the vendor has tested the fuel according to the specified reference methods, retaining the vendor's delivery receipt is sufficient.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

30. Gulf Power October 28, 1997 Comment:

Page 30 B.29. Operating Rate During Testing. Outlines that testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.

Comment: Since capacity is defined as heat input in MMBtu/hour. Specific reference needs to be made that heat input shall be determined by fuel consumption calculations from data collected and analyzed during the reference tests and averaged over the test runs. If fuel consumption data is not available, then the source may select to use data calculated from EPA Reference Method 2 & 3 collected during the reference tests and averaged over the tests.

FDEP November 14, 1997 Response:

Condition B.17. (Rule 62-297.310(5), F.A.C.) requires that equipment be maintained in order to determine process variables. No other references are needed.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power doesn't accept the FDEP response. Gulf Power believes testing conditions must be clearly defined in the permit condition to avoid conflict with environmental inspectors and interested public persons. Gulf Power suggests adding the following into the condition: Capacity (heat input) shall be determined by fuel consumption calculations from data collected and analyzed during the compliance reference tests and averaged over the test runs.

31. Gulf Power October 28, 1997 Comment:

Page 32. B.31. Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter is an annual 3 run hourly test and SO₂ is a 24 hour daily average using CEMS data. It should be noted that heat input for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/MMBtu) can be determined by the F-factor method outlined in B.21. during the test. Daily (24 hour) SO₂ emission rates shall be determined by CEM monitors on a real time basis outlined in B.23 See **B. 17 for the same comments. Delete Condition B.31(a) Required Equipment.**

FDEP November 14, 1997 Response

See response to comment 7, above.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power doesn't accept the FDEP response above. The condition should be deleted because it repeats Condition B17. Gulf Power requests that B.31(a) Required Equipment be deleted.

32. Gulf Power October 28, 1997 Comment:

Page 32 B. 31. Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated, calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. Rule 62-297.310(5)

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO₂ compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing. See **B.17 for the same comments. Delete Condition B.31(b) Accuracy of Equipment.**

FDEP November 14, 1997 Response:

If any of the referenced equipment is needed for determining missing variables, calibration shall be sufficiently demonstrated prior to its use.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power doesn't accept the FDEP response. Condition is a repeat of Condition B.17 and should be deleted. Gulf Power requests B.31.(b) Accuracy of Equipment be deleted.

33. Gulf Power October 28, 1997 Comment:

Page 32 B.32. Recordkeeping and Reporting Requirements. Requires owner or operator to maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. Rule 62-214.440 and 62-4.070(3) F.A.C.

Comments: Unit(s) should not have to maintain continuous records of fuel consumption if the unit accepts continuous emissions monitoring as a compliance method and accepts a percent sulfur restriction for sulfur dioxide compliance for liquid fuels and burns gas. Liquid fuel is monitored by as-received vendor fuel analysis. See condition A.20. Only annual reporting under the Annual Operating Report should be required.

FDEP November 14, 1997 Response:

This condition supports **Condition B.4.** See comment and response number 24., above.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power accepts FDEP response.

34. Gulf Power October 28, 1997 Comment:

Page 32 B.33. Recordkeeping and Reporting Outline notification and reporting requirements in case of excess emissions resulting from malfunctions.

Comment: It should be noted that notification to the Department is required after the two hour daily exemption has occurred and not from any malfunction.

FDEP November 14, 1997 Response:

The Department does not agree with this interpretation.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power doesn't agree with FDEP response and will seek clarification through a FDEP Guidance Memo and/or future Title V Permit Simplification rulemaking.

35. Gulf Power October 28, 1997 Comment:

Page 35 B.37. e. Testing Requirements: Outline testing requirements for used oil.

Comment: Used oil for which the operator has generator knowledge having no possibility of contamination by PCB should not be required to test for PCBs.

FDEP November 14, 1997 Response:

Same as response 19. **Condition B.37.e.** will be changed accordingly.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with FDEP response.

36. Gulf Power October 28, 1997 Comment:

Page 35 B.37. f. Record Keeping Requirements: The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (1): Condition requires the source to maintain records of quantities of used oil generated that is transferred into the approved AST (above ground storage tank) at the source.

Comments: Current procedures allow the AST to be batch-tested once it is filled and that quantity burned. It is overly burdensome to maintain records of each volume of oil added to the AST during any period. Additionally, there is no regulatory requirement for records to be completed by any specified date, particularly arbitrarily derived dates.

Page 35 B.37. f. Record Keeping Requirements The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP(Best Management Practices). (2): Requires records of used oil management to completed by no later than the fifteenth day of the succeeding month.

Comment: There is no regulatory requirement for any specified date for record keeping completion purposes. The Department's language in this part of the proposed condition regarding consecutive 12 month periods is not consistent with earlier provisions which talk about a calendar year limitation on the total quantity of used oil that can be burned. Delete this requirement.

FDEP November 14, 1997 Response:

Same as response 20. **Condition B.37.f.** will be changed accordingly.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with FDEP response.

37. Gulf Power October 28, 1997 Comment:

Page 35 B.37. g. Reporting Requirements. Requires the source to report to the Northwest District office within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

Comment: There is no current regulatory requirement for quarterly reporting of used oil activities to the District. Current reporting through the Annual Operating Reporting should be adequate to meet monitoring of on-specification used oil activities.

NOTE: Cite [40 CFR 761.20(e)] is not applicable to these conditions; this cite addresses marking requirements for PCB containers.

FDEP November 14, 1997 Response:

Same as response 21. **Condition B.37.g.** will be changed accordingly.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with the FDEP response.

Subsection C:

38. Gulf Power October 28, 1997 Comment:

Page 36 Description of Emission Units Crist 6 & 7.

Comments: Description makes note of NO_x emissions from unit -007 are controlled by Foster Wheeler Low NO_x Burners. Crist Unit 006 has the same control system without reference in the description. Add Crist 006 to the reference.

FDEP November 14, 1997 Response: Agreed.

As a result of this comment, Subsection C, Facility description is changed;

From:

{Permitting notes: These emissions units are regulated under Acid Rain, Phase I. These emissions units pre-date PSD regulations and are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Fired Steam Generators with more than 250 million Btu per Hour Heat Input. Particulate matter emissions from unit-006 are controlled by a cold side electrostatic precipitator (Wheelabrator Model # HaRDE). Particulate matter emissions from unit -007 are controlled by cold side Buell electrostatic precipitators. NO_x emissions from unit -007 are controlled by Foster Wheeler Low NO_x Burners. Unit -006 began commercial operation on May 1, 1970. Unit -007 began commercial operation on August 1, 1973. Units -006 and -007 share a common stack. Stack height = 450 feet, exit diameter = 23.2 feet, exit temperature = 320 °F, actual volumetric flow rate = 2,462,700 acfm.}

To:

{Permitting notes: These emissions units are regulated under Acid Rain, Phase I. These emissions units pre-date PSD regulations and are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Fired Steam Generators with more than 250 million Btu per Hour Heat Input. Particulate matter emissions from unit-006 are controlled by a cold side electrostatic precipitator (Wheelabrator Model # HaRDE). Particulate matter emissions from unit -007 are controlled by cold side Buell electrostatic precipitators. NO_x emissions from units -006 and -007 are controlled by Foster Wheeler Low NO_x Burners. Unit -006 began commercial operation on May 1, 1970. Unit -007 began commercial operation on August 1, 1973. Units -006 and -007 share a common stack. Stack height = 450 feet, exit diameter = 23.2 feet, exit temperature = 320 °F, actual volumetric flow rate = 2,462,700 acfm.}

Gulf Power December 15, 1997 Comment: Gulf Power agrees with FDEP response.

39. Gulf Power October 28, 1997 Comment:

Page 36 C.1. Permitted Capacity Lists permitted capacities of emissions unit numbers 006 and 007.

Comment: Add notation that permitted capacity can not be accurately monitored or determined by use of continuous emission monitoring systems installed or operated pursuant to 40 CFR Part 75.

FDEP November 14, 1997 Response:

The requested comment is not needed as Condition C.17. requires that "The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards."

As a result of this comment, no change will be made.

Gulf Power Company December 15, 1997 Comment: Gulf Power accepts FDEP response with the understanding that comments under Condition C. 17 can be amended to include that Fuel Sampling & Analysis is the only compliance method used to determine permitted capacity limits.

40. Gulf Power October 28, 1997 Comment:

Page 37 C.4 Hours of Operation. Requires Units 6 & 7 to maintain an operations log available for Department inspection that documents the total hours of annual operation, including a detailed account of hours operated on each of the allowable fuels. 62-213.440 and 62-210.200(PTE).

Comment: Unit(s) should not have to keep a continuous log of operations. Requirement does not note if this is a daily, hourly, monthly or annual log. These units maintain compliance to SO₂ standards through CEMS. The current reporting under the AOR is all that should be required.

FDEP November 14, 1997 Response:

Rule 62-213.440, F.A.C. requires Title V permits to include "...operational requirements and limitations that assure compliance with all applicable requirements,..." Without the log book documentation, an annual claim on the AOR is not easily supportable and would not meet the requirements of Rule 62-213.440, F.A.C. A specification to daily, hourly, monthly, etc. is not needed as a detailed account of all fuels used is not time specific.

As a result of this comment, no change will be made.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

41. Gulf Power October 28, 1997 Comment:

Page 37 C.7. Particulate Matter. Requires particulate matter from unit 6 shall not exceed 1,475 tons/year.

Comment: Calculation in error; The correct particulate matter limit per year for Crist 6 should be 1,622.7 tons/year. This should not be a specific condition, perhaps a non-enforceable permitting note. The Department rule cite does not require an annual mass particulate emission limitation. This information was originally listed in the Unit 6 ESP Construction Permit for information only.

FDEP November 14, 1997 Response:

This limit is contained in the unit 6 construction permit and is, therefore, an applicable requirement for the Title V permit.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

42. Gulf Power October 28, 1997 Comment:

Page 38 C.9. Sulfur Dioxide - Solid Fuel. Requires sulfur dioxide emissions to be limited to 87,035 tons/year for Crist 6.

Comment: Calculation in error; The correct sulfur dioxide limit per year for Crist 6 should be 95,739 tons/year. This should not be a specific condition, perhaps a non-enforceable permitting note. The Department rule cite does not require an annual SO₂ emission limitation. This information was originally listed in the Unit 6 ESP Construction Permit for information only.

FDEP November 14, 1997 Response:

This limit is contained in the unit 6 construction permit and is, therefore, an applicable requirement for the Title V permit.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

43. Gulf Power October 28, 1997 Comment:

Page 39. C.17. Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter is an annual 3 run hourly test and SO₂ is a 24 hour daily average using CEMS data. It should be noted that heat input for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/MMBtu) can be determined by the F-factor method outlined in C. 21 during the test. Daily (24 hour) SO₂ emission rates shall be determined by CEM monitors on a real time 24 hour basis as outlined in C.23.

FDEP November 14, 1997 Response:

Condition C.17. is a general requirement pertaining to compliance testing. It establishes the requirement for maintaining the necessary equipment for determining all variable associated with the compliance if they are needed for determination of compliance. If no additional variables are needed for a particular test, then no additional equipment is needed to be maintained.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power doesn't not accept FDEP response. Gulf Power believes specific methods need to be outlined in this condition so environmental inspectors and general public interest know how compliance is determined. It should be clear that this requirement applies only to the demonstration period of compliance which for particulate matter and SO₂ is an annual 3 run hourly test. It should be noted that heat input (MMBtu/hr) for capacity purposes is to be determined only by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/MMBtu) shall be determined by the EPA F-factor method as outlined in A.19 during the annual test. SO₂ process variables (MMBtu/hr) are to be determined by vendor fuel oil analysis or Company fuel analysis procedures as outlined in Condition C.25 Fuel Sampling and Analysis.

44. Gulf Power October 28, 1997 Comment:

Page 39 C. 17. Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated , calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. Rule 62-297.310(5)

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO₂ compliance has QA/QC procedures associated with the acid rain program and meet QC provisions in C23. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing.

FDEP November 14, 1997 Response:

If any of the referenced equipment is needed for determining missing variables, calibration shall be sufficiently demonstrated prior to its use.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power doesn't accept the FDEP response. Gulf Power believes the permit condition should be clear to its meaning. Gulf Power suggests the following be added to the condition: This requirement applies to equipment used during compliance testing. Equipment used for SO₂ compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period.

45. Gulf Power October 28, 1997 Comment:

Page 39 C.18. Annual Tests Required . Requires annual tests for SO₂ and PM emissions in accordance with listed requirements.

Comments: Unclear on how compliance is determined for SO₂. Addition should be made to this section noting SO₂ compliance is determined by CEMs as outlined in section C.23. (See similar language used under visible emissions in section C.19)

FDEP November 14, 1997 Response:

The SO₂ CEM satisfies the monitoring requirement contained in Rule 62-296.405(1)(f)1.b., F.A.C. Rule 62-296.405(1)(e)3., F.A.C., requires a method 6, 6A, 6B or 6C test. Rule 62-297.310(7)(a)4., F.A.C., requires the test each federal fiscal year.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

46. Gulf Power October 28, 1997 Comment:

Page 39 C.19. Visible Emissions Notes permittee has elected to utilize a transmissometer (opacity meter) for demonstrating compliance with the visible emissions limit.

Comment: Gulf Power's continuous emission monitors for opacity only records and reports opacity in block 6 minute intervals.

FDEP November 14, 1997 Response:

This is consistent with the rule requirements.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with the FDEP response but requests the 6 minute monitoring interval to be noted in the permit condition. This information is needed to clarify the monitoring timeframe for environmental inspectors and public interest persons.

47. Gulf Power October 28, 1997 Comment:

Page 41 C.23. Monitoring of Operations. Requires continuous SO₂ emission monitoring using 24 hour averages with standards of the Department (See Specific Condition 4)

Comment: Specific Condition 4 is Hours of Operation. The correct reference should be Specific Condition C.9 Sulfur Dioxide - Solid Fuel and C.10 Sulfur Dioxide - Liquid Fuel. Also, Delete “immediately initiate as-fired fuel sampling” to language outlined in the existing permit, i.e. 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.

FDEP November 14, 1997 Response:

Specific Condition 4 was a left over reference from the existing operation permit, it should say “see Conditions C.9. - C.11.”. It appears that a 36 hour delay in implementing fuel sampling may conflict with the upcoming CAM rule, however, we will continue to follow the condition in the existing operation permit until such time that the CAM rule is implemented. At that time, the permit will be amended accordingly.

As a result of this comment, **Condition C.23.** is changed:

From:

C.23. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standards 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 immediately initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emissions standard. 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 emissions compliance by the temporary use of a spare SO₂ emissions 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. At a minimum, the QC program must include written procedures which shall describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. Calibration Drift (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.

[Rules 62-213.440, 62-204.800(7)(e)5., and 62-296.405(1)(f)1.b., F.A.C.; and, Permits AC17-234016 and AO17-171806.]

To:

C.23. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standards of the Department (see **Conditions C.9. - C.11.**). 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 emissions 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 emissions

compliance by the temporary use of a spare SO₂ emissions 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. At a minimum, the QC program must include written procedures which shall describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. Calibration Drift (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.

[Rules 62-213.440, 62-204.800(7)(e)5., and 62-296.405(1)(f)1.b., F.A.C.; and, Permits AC17-234016 and AO17-171806.]

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

48. Gulf Power October 28, 1997 Comment:

Page 41 C.25. Fuel Sampling and Analysis. Outline various ASTM procedures for use to demonstrate compliance with the sulfur dioxide standard in the event that the SO₂ CEM is not able to capture valid data.

Comment: Section (a) and (c) should be deleted and replaced with the provision that the source has accepted a sulfur percent limit for fuel oil and that limit will be verified with a fuel analysis provided by the vendor upon each fuel delivery. Additionally, references to the density of the fuel oil in Section (e) should be deleted. Added to Section (f), it should be noted that if fuel oil is consumed during a day when these procedures are used that the latest fuel oil vendor analysis will be used to calculate the SO₂ emission rate.

FDEP November 14, 1997 Response:

Sections (a) and (c) require the permittee to "Determine and record...". This does not say to test and record. As long as you are able to demonstrate that the vendor has tested the fuel according to the specified reference methods, retaining the vendor's delivery receipt is sufficient.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

49. Gulf Power October 28, 1997 Comment:

Page 44 C.29. Operating Rate During Testing. Outlines that testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.

Comment: Since capacity is defined as heat input in MMBtu/hour. Specific reference needs to be made that heat input shall be determined by fuel consumption calculations from data collected and analyzed during the reference tests and averaged over the test runs. If fuel consumption data is not available, then the source may select to use data calculated from EPA Reference Method 2 & 3 collected during the reference tests and averaged.

FDEP November 14, 1997 Response:

Condition C.17. (Rule 62-297.310(5), F.A.C.) requires that equipment be maintained in order to determine process variables. No other references are needed.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power doesn't accept the FDEP response. Gulf Power believes testing conditions must be clearly defined in the permit condition to avoid conflict with environmental inspectors and interested public persons. Gulf Power suggests adding the following into the condition: Capacity (heat input) shall be determined by fuel consumption calculations from data collected and analyzed during the compliance reference tests and averaged over the test runs.

50. Gulf Power October 28, 1997 Comment:

Page 46 C.32. Recordkeeping and Reporting Requirements. Requires owner or operator to maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. Rule 62-214.440 and 62-4.070(3) F.A.C.

Comments: Unit(s) should not have to maintain continuous records of fuel consumption if the unit accepts continuous emissions monitoring as a compliance method and accepts a percent sulfur restriction for sulfur dioxide compliance for liquid fuels and burns gas. Liquid fuel is monitor though as-received fuel analysis. See condition A.20. Only annual reporting under the Annual Operating Report should be required.

FDEP November 14, 1997 Response:

This condition supports **Condition C.4.** See comment and response number 40., above.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

51. Gulf Power October 28, 1997 Comment:

Page 46 C.33. Recordkeeping and Reporting Outline notification and reporting requirements in case of excess emissions resulting from malfunctions.

Comment: It should be noted that notification to the Department is required after the two hour daily exemption has occurred and not from any malfunction.

FDEP November 14, 1997 Response:

The Department does not agree with this interpretation.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power doesn't agree with FDEP response and will seek clarification through a FDEP Guidance Memo and/or future Title V Permit Simplification rulemaking.

52. Gulf Power October 28, 1997 Comment:

Page 48 C.37. e. Testing Requirements: Outline testing requirements for used oil.

Comment: Used oil for which the operator has generator knowledge having no possibility of contamination by PCB should not be required to test for PCBs.

FDEP November 14, 1997 Response:

Same as response 19. **Condition C.37.e.** will be changed accordingly.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

53. Gulf Power October 28, 1997 Comment:

Page 48 C.37. f. Record Keeping Requirements: The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (1): Condition requires the source to maintain records of quantities of used oil generated that is transferred into the approved AST(above ground storage tank) at the source.

Comments: Current procedures allow the AST (above ground storage tank) to be batch-tested once it is filled and that quantity burned. It is overly burdensome to maintain records of each volume of oil added to the AST during any period. Additionally, there is no regulatory requirement for records to be completed by any specified date, particularly arbitrarily derived dates.

Page 46 C.37. f. Record Keeping Requirements The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (2): Requires records of used oil management to be completed by no later than the fifteenth day of the succeeding month.

Comment: There is no regulatory requirement for any specified date for record keeping completion purposes. The Department's language in this part of the proposed condition regarding consecutive 12 month periods is not consistent with earlier provisions which talk about a calendar year limitation on the total quantity of used oil that can be burned. Delete this requirement.

FDEP November 14, 1997 Response:

Same as response 20. **Condition C.37.f.** will be changed accordingly.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

54. Gulf Power October 28, 1997 Comment:

Page 46 C.37. g. Reporting Requirements. Requires the source to report to the Northwest District office within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

Comment: There is no current regulatory requirement for quarterly reporting of used oil activities to the District. Current reporting through the Annual Operating Reporting should be adequate to meet monitoring of on-specification used oil activities.

NOTE: Cite [40 CFR 761.20(e)] is not applicable to these conditions; this cite addresses marking requirements for PCB containers.

FDEP November 14, 1997 Response:

Same as response 21. **Condition C.37.g.** will be changed accordingly.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

Subsection D:

55. Gulf Power October 28, 1997 Comment:

Page 52 D.12. Recordkeeping and Reporting Outline notification and reporting requirements in case of excess emissions resulting from malfunctions.

Comment: It should be noted that notification to the Department is required after the two hour daily exemption has occurred and not from any malfunction.

FDEP November 14, 1997 Response:

The Department does not agree with this interpretation.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power doesn't agree with FDEP response and will seek clarification through a FDEP Guidance Memo and/or future Title V Permit Simplification rulemaking.

SECTION IV ACID RAIN PART:

56. Gulf Power October 28, 1997 Comment:

Page 55 EU-004. Outlines SO2 Allowances for years 2000, 2001, 2002.

Comments: Error in SO2 Allowances for years 2001 and 2002. The correct value should be 2446.

FDEP November 14, 1997 Response:

The requested change will be made.

As a result of this comment, Condition A.2. is changed:

From:

-004	ID No. 04 4	SO ₂ allowances, under Table 2, 3, or 4 of 40 CFR 73	2446*	25040*	25040*
		NO _x limit	**	**	**

To:

-004	ID No. 04 4	SO ₂ allowances, under Table 2, 3, or 4 of 40 CFR 73	2446*	2446*	2446*
		NO _x limit	**	**	**

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

57. Gulf Power October 28, 1997 Comment:

Page 56 A.4 Comments, notes and justifications. Notes Designated Representative history.

Comments: Add most recent change from G. Edison Holland, Jr. to Robert G. Moore. Additionally, it should be noted that this specific condition should be changed to an unenforceable “permitting note” since this information can and will change frequently with appropriate notice.

FDEP November 14, 1997 Response:

The change to Robert G. Moore will be made. This information is federally enforceable through the Acid Rain Program. If changes to the Designated Representative need to be made, it can be updated in the Title V permit by means of an administrative correction.

As a result of this comment, Condition A.4. is changed:

From:

A.4. Comments, notes, and justifications: The Designated Representative has been changed from Frederick Kuester to G. Edison Holland, Jr.

To:

A.4. Comments, notes, and justifications: The Designated Representative has changed from Frederick Kuester to G. Edison Holland, Jr. to Robert G. Moore.

Gulf Power December 15, 1997 Comment: Gulf Power has since revised the DR to Bill M. Guthrie and ADR to include both Robert G. Moore and James O. Vick. Gulf Power requests the latest changes be incorporated into the Title V draft. EPA has accepted these requests.

APPENDIX E-1

58. Gulf Power October 28, 1997 Comment:

General Comment: Many of the list of trivial or insignificant activities noted under the facility section and the applicant's "Emissions Unit 10" outlined in the Crist Title V Application were not included in the final permit. Gulf Power assumes that these activities and units not listed in the permit were determined to be either exempt or unregulated as "Trivial" by the Department's guidance memorandum dated March 15, 1996 or agreed to by the Department as case by case trivial activities requiring no permitting action.

FDEP November 14, 1997 Response:

Your assumption is correct.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power believes this information needs to be identified in the Title V permit for clarification for environmental inspectors and for public interest groups. Gulf Power requests the above referenced language be incorporated into the Title V permit.

APPENDIX U-1

59. Gulf Power October 28, 1997 Comment:

General Comment: Fugitive PM emissions from Sandblasting are not listed as an unregulated emissions as outlined in the Crist Title V Application under Emissions Unit 10. Addition of this activity is requested.

FDEP November 14, 1997 Response:

Agreed.

As a result of this comment, Appendix U-1 is changed:

From:

E.U. ID

No. Brief Description of Emissions Units and/or Activity

- aaa Material Handling of Coal and Ash
- bbb Fugitive PM Sources - On-site Vehicles
- ccc General Purpose Internal Combustion Engines
- ddd Cooling Towers (3)

-aaa Material Handling of Coal and Ash. Fugitive PM emissions generated from the transfer and handling of coal and ash. SCC: 3-05-101-03.

-bbb Fugitive PM Sources. Fugitive PM emissions generated by haul trucks and other on-site vehicles. SCC: 3-05-101-50.

-ccc General Purpose Internal Combustion Engines. Located for use at this source are miscellaneous internal combustion engines used to operate the following: welders, compressors, generators, water pumps, sweepers, and other auxiliary equipment.

-ddd Cooling Towers. SCC: _____

To:

E.U. ID

No. Brief Description of Emissions Units and/or Activity

- aaa Material Handling of Coal and Ash
- bbb Fugitive PM Sources - On-site Vehicles
- ccc General Purpose Internal Combustion Engines
- ddd Cooling Towers (3)
- eee Fugitive PM Sources – Sandblasting Operations

-aaa Material Handling of Coal and Ash. Fugitive PM emissions generated from the transfer and handling of coal and ash. SCC: 3-05-101-03.

-bbb Fugitive PM Sources. Fugitive PM emissions generated by haul trucks and other on-site vehicles. SCC: 3-05-101-50.

-ccc General Purpose Internal Combustion Engines. Located for use at this source are miscellaneous internal combustion engines used to operate the following: welders, compressors, generators, water pumps, sweepers, and other auxiliary equipment.

-ddd Cooling Towers. SCC: _____

-eee Fugitive PM Sources. Fugitive PM emissions generated by sandblasting operations. SCC: 3-05-101-99.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

TABLE 1-1

60. Gulf Power October 28, 1997 Comment:

Comment: See attached Table 1-1 for corrections.

FDEP November 14, 1997 Response:

The following changes will be made to Table 1-1:

The SO₂ emissions limit for units -002 and -003 is corrected to 1.98 lb/MMBtu.

The SO₂ Equivalent Emissions for unit -003 are changed to 1,098.0 lb/hr. and 4,769.8 TPY.

The SO₂ Equivalent Emissions for unit -006 are changed to 8,609.8 TPY. The SO₂ and PM allowable Tons Per Year remain as listed due to the limits contained in permit AC17-234016.

The PM-SB equivalent emissions limits are correct as listed, no changes will be made.

These changes will be reflected in Table 1-1 of the PROPOSED permit.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

TABLE 2-1

61. Gulf Power October 28, 1997 Comment:

Comment: See attached Table 2-1 for corrections.

FDEP November 14, 1997 Response:

The Compliance Method sections for visible emissions for units -004, -005, -006 and -007 will be changed to reflect the use of opacity meters. The SO₂ sections will remain as is since the SO₂ monitors are used to satisfy the monitoring requirement in lieu of fuel sampling, annual SO₂ tests are required for compliance. Footnote 4 will be deleted since this source does not contain combustion turbines.

These changes will be reflected in Table 2-1 of the PROPOSED permit.

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP response.

III. GULF POWER COMMENTS ON E-mail memo from Kim Gates, EPA, received by FDEP on 11/3/97.

1.LH Comment:

The heat inputs for Units 004 through 007 are not consistent between the statement of basis and the permit text. The statement of basis has 490.9, 421.6, 3368, and 5824 million BTU per hour respectively for these units. Pages 2, 23, 38, 39 and 61 of the permit list these as 1096.7, 1096.7, 3704.8, and 6406.4 million BTU per hour, respectively. Additionally, both Units 004 and 005 are designated as 'Boiler Number 4' in the statement of basis and in the brief description in Subsection B on Page 22 of the permit.

FDEP November 14, 1997 Response:

The Statement of Basis will be corrected to match the permit. The brief description in the permit itself is correct.

As a result of this comment, the Statement of Basis will be changed, see attached.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with the FDEP response.

2.LH Comment:

Sections B.3 and C.3 state that on-site generated oil contaminated soil is periodically burned for energy recovery purposes. Are there limits on the rate this 'fuel' can be burned? Because of the nature of soil, would there be any possibility that the particulate mass limit would be violated during firing? Condition C.3 also lists injection of ammonia and sulfur trioxide as supplemental injections. Does this supplemental injection apply to Units 006 and 007 or to just one of the units? The statement of basis should include this information and why this injection is needed. Are there record keeping requirements for both the above issues? What is the projected annual usage of SO₃?

FDEP November 14, 1997 Response:

The burning of oil contaminated soil is only a periodic occurrence. At sources that are capable of doing so, the Department encourages on-site clean-up and remediation. Burning dirt is certainly not a regular occurrence nor is it something that a facility that generates electrical energy for profit would choose to do, however, in the case of an accidental oil spill, keeping the contaminated soil and clean-up operations on-site is preferred. Because there is no way to predict the amount of accidental spillage during a given year, there are no annual limits placed on the amount of contaminated soil that can be burned. No matter what type of fuel is being burned in these units, the particulate matter emissions limit of 0.1 pounds per million Btu applies. The burning of soil does not grant a waiver of this emissions limit. Florida does not have any specific Rule authority to limit the amount of ammonia or sulfur trioxide that is injected as an aid in the control of particulate matter emissions. As a result, there are no record keeping requirements imposed. The Statement of Basis will be updated to include this information.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with the FDEP response.

3.LH Comment:

Sections C.7 and C.8: An annual maximum mass emission rate (tons per year) is specified for Unit 006. Are there a maximum tons per year for units 004, 005, 007? For Unit 006, $8760 \times 0.1 \times 3368 = 1475$ tons. However, C.8 allows 0.3 for 3 hours each day. This would result in a calculation of $3368 \times 0.3 \times 3 \times 365 + 3368 \times 0.1 \times 21 \times 365 = 1844$ tons.

FDEP November 14, 1997 Response:

Permit number AC17-234016 limits particulate matter emissions to 1,475 tons per year. It does not provide an allowance for exceedences due to soot blowing conditions, therefore, this is interpreted to be total PM emissions. There are no total ton per year limits associated with units -004, -005 or -007.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with the FDEP response.

4.LH Comment:

Section IV, Acid Rain Part, A.2. The table shows for emission point 004, a jump to 25040 tons sulfur dioxide in 2001 and 2002 from 2446 tons sulfur dioxide for 2000. Coincidentally, the figure 25040 is the value in 40 CFR Part 73 for Crystal River unit 5.

FDEP November 14, 1997 Response:

The error has been corrected, see comment and response 57, above.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with the FDEP response.

5.DM Comment:

A.14-5 and A.22. We are concerned about the lack of periodic monitoring provisions for particulate mass (PM) emissions and opacity for Units 1 through 3. The monitoring provisions in A.14-5 do not address PM and opacity periodic monitoring for Units 1 through 3, and according to the testing requirements in A.22, annual testing to verify compliance with PM and opacity limits is waived during any year in which liquid and/or solid fuels are burned for no more than 400 hours. If it is not necessary to conduct periodic monitoring to obtain the data used as the basis for the annual compliance certification, the statement of basis must be revised to explain the basis for this conclusion. In cases where a basis for waiving monitoring cannot be justified, an annual test alone will rarely be considered adequate periodic monitoring.

Obviously, for periods of time when natural gas is combusted in Units 1 - 3, maintaining fuel usage records will constitute adequate periodic monitoring for both PM and opacity. In the case of fuel oil, however, the statement of basis must be revised to explain why no monitoring is necessary or adequate periodic monitoring provisions must be added to the permit. If a waiver of monitoring for the periods of time when oil is combusted is not justified in the statement of basis, the annual testing currently required in the permit must be supplemented with additional monitoring that can be used for certifying compliance with the PM and opacity limits. For the PM limit, Region 4 believes that keeping records to verify that the ash content of the oil combusted is consistent with that burned during tests conducted when compliance was demonstrated will be adequate. For the opacity standard, Region 4 believes that visible emissions data should be collected on at least a daily basis on the days during which oil is combusted.

Unless a justification for waiving monitoring is provided in the statement of basis, Region 4 does not consider the number of hours during which oil is combusted to be a relevant factor to consider when deciding whether periodic monitoring is necessary when oil is combusted in Units 1 - 3. Gulf Power has an obligation to certify compliance with all applicable emission standards on an annual basis, and if no testing or monitoring is conducted, the company will not have any data to rely on as the basis for the certification of compliance with the PM and opacity limits for Units 1 - 3.

FDEP November 14, 1997 Response:

The referenced conditions are consistent with the Department's rules and state statutes that are contained in our State Implementation Plan. We have no legal authority to impose any other monitoring requirements other than what is contained in this permit.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with the FDEP response.

6.DM Comment:

The lack of a requirement for conducting periodic monitoring to obtain data that will be used as a basis for certifying compliance with the PM emission limit for the coal-fired units is unacceptable. Periodic monitoring for units that rely on the use of control equipment to comply with an applicable emission standard has been discussed by the Regional Title V Workgroup, and the consensus of the participating regions is that periodic stack testing alone does not constitute adequate periodic monitoring for such units. For units that rely on the use of control equipment to comply with an applicable PM emission standard, the consensus of the Title V Workgroup is that periodic monitoring tied to either control device operating parameters or to opacity is acceptable.

FDEP November 14, 1997 Response:

See response 5.DM, above.

As a result of this comment, no changes will be made.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with the FDEP response.

7.DM Comment:

Monitoring, Units 4-7 (Pages 25-26 for Units 4 and 5 and Pages 41- 42 for Units 6 and 7). Since certified opacity monitors are installed on Units 4 through 7, and since the permit indicates that these monitors will be used for determining compliance with the applicable opacity standard, a requirement to calibrate, operate, and maintain these monitors should be added to these sections of the permit.

FDEP November 14, 1997 Response:

The requirements to calibrate and maintain the opacity monitors are contained in conditions B.15., B.24., C.19. and C.24.

As a result of this comment, no changes are required.

Gulf Power December 15, 1997 Comment: Gulf Power agrees with the FDEP response.

8.JJ Comment:

Condition A.14 establishes that compliance with the liquid sulfur limit will be verified by fuel analysis provided by the vendor upon each fuel delivery. Condition A.30 establishes the requirement that the owner or operator maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. It is unclear as to whether or not the "on specification" fuel oil is included in the fuel being supplied by an outside source providing vendor verification of the sulfur content (as required by Condition A.14) . If the used oil is not being supplied by the outside vendor, it is unclear how the owner or operator is to monitor the sulfur content of the oil. Condition A.34 establishes that the owner or operator must sample and analyze each batch of used oil to be burned for arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs, however, there does not appear to be any requirement that the owner or operator sample or analyze the "on specification" fuel oil for sulfur content.

FDEP November 14, 1997 Response:

Conditions A.10, B.11. and C.11. limit the sulfur content of liquid fuel, inclusive of used oil. Because only used oil generated by Gulf Power Company is allowed to be burned at this source, there would be no vendor's delivery receipt to verify the sulfur content. Therefore, it would be reasonable to require the used oil to be sampled for the sulfur content and heating value.

As a result of this comment, Conditions A.34., B.37. and C.37. are changed (in part):

From:

- e. Testing Requirements: For each batch of used oil to be burned, the owner or operator must be able to demonstrate that the used oil qualifies as on-specification used oil and that the PCB content is less than 50 ppm.

The requirements of this demonstration are governed by the following federal regulations:

Analysis of used oil fuel. A generator, transporter, processor/ re-refiner, or burner may determine that used oil that is to be burned for energy recovery meets the fuel specifications of Sec. 279.11 by performing analyses or obtaining copies of analyses or other information documenting that the used oil fuel meets the specifications.

[40 CFR 279.72(a)]

Testing of used oil fuel. Used oil to be burned for energy recovery is presumed to contain quantifiable levels (2 ppm) of PCB unless the marketer obtains analyses (testing) or other information that the used oil fuel does not contain quantifiable levels of PCBs.

- (i) The person who first claims that a used oil fuel does not contain quantifiable level (2 ppm) PCB must obtain analyses or other information to support that claim.
- (ii) Testing to determine the PCB concentration in used oil may be conducted on individual samples, or in accordance with the testing procedures described in Sec. 761.60(g)(2). However, for purposes of this part, if any PCBs at a concentration of 50 ppm or greater have been added to the container or equipment, then the total container contents must be considered as having a PCB concentration of 50 ppm or greater for purposes of complying with the disposal requirements of this part.
- (iii) Other information documenting that the used oil fuel does not contain quantifiable levels (2 ppm) of PCBs may consist of either personal, special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the oil contains no detectable PCBs.

[40 CFR 761.20(e)(2)]

When testing is required, the owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs.

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

To:

- e. Testing Requirements: For each batch of used oil to be burned, the owner or operator must be able to demonstrate that the used oil qualifies as on-specification used oil and that the PCB content is less than 50 ppm.

The requirements of this demonstration are governed by the following federal regulations:

Analysis of used oil fuel. A generator, transporter, processor/ re-refiner, or burner may determine that used oil that is to be burned for energy recovery meets the fuel specifications of Sec. 279.11 by performing analyses or obtaining copies of analyses or other information documenting that the used oil fuel meets the specifications.

[40 CFR 279.72(a)]

Testing of used oil fuel. Used oil to be burned for energy recovery is presumed to contain quantifiable levels (2 ppm) of PCB unless the marketer obtains analyses (testing) or other information that the used oil fuel does not contain quantifiable levels of PCBs.

- (i) The person who first claims that a used oil fuel does not contain quantifiable level (2 ppm) PCB must obtain analyses or other information to support that claim.
- (ii) Testing to determine the PCB concentration in used oil may be conducted on individual samples, or in accordance with the testing procedures described in Sec. 761.60(g)(2). However, for purposes of this part, if any PCBs at a concentration of 50 ppm or greater have been added to the container or equipment, then the total container contents must be considered as having a PCB concentration of 50 ppm or greater for purposes of complying with the disposal requirements of this part.
- (iii) Other information documenting that the used oil fuel does not contain quantifiable levels (2 ppm) of PCBs may consist of either personal, special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the oil contains no detectable PCBs.

[40 CFR 761.20(e)(2)]

When testing is required, the owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs.

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

Additionally, the owner or operator shall sample and analyze each batch of used oil to be burned for the sulfur content (by weight), density and heat content in accordance with applicable test methods (see Conditions A.21., B.25 and C.25.).

Gulf Power December 15, 1997 Comment: Gulf Power agrees with the FDEP response.

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6000



November 12, 1997

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Dear Mr. Sheplak:

RE: PLANT CRIST TITLE V RESPONSIBLE OFFICIAL CHANGE:
DRAFT PERMIT No: 0330045-001-AV

Attached, please find Gulf Power's request change for "Responsible Official" regarding the Draft Title V Permit (0330045-001-AV) issued on September 30, 1997 for the Crist Electric Generating Plant.

If you have any questions or need further information regarding this request, please call me at (850) 444.6527.

Sincerely,

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

G. Dwain Waters, QEP
Air Quality Programs Coordinator,

cc: Robert G. Moore., Gulf Power Company
James O Vick, Gulf Power Company
J. W. Martin, Gulf Power Company
John Dominey, Gulf Power Company
Danny Herrin, Southern Company Services

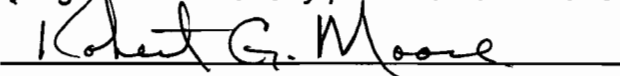
11/18/97 cc: Jonathan Holton

RECEIVED

NOV 13 1997

BUREAU OF
AIR REGULATION

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official :	
Name :	Robert G. Moore.
Title :	V.P. Power Generation/Transmission
2. Owner or Authorized Representative or Responsible Official Mailing Address :	
Organization/Firm :	Gulf Power Company
Street Address :	One Energy Place
City :	Pensacola
State :	FL
Zip Code :	32520-0100
3. Owner/Authorized Representative or Responsible Official Telephone Numbers :	
Telephone :	(850)444-6383
Fax :	(850)444-6744
4. Owner/Authorized Representative or Responsible Official Statement :	
<p><i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions units.</i></p>	
 Signature	<u>10/15/97</u> Date

* Attach letter of authorization if not currently on file.

To: sheplak_s
CC: ADAMS.YOLANDA
CC: JACHIM.JENNY
CC: HAYNES.WILSON
CC: MCNEAL.DAVE
CC: PIERCE.CARLA

cc: Jonathan
u/s Bruce
Clair

ELECTRONIC TRANSMISSION

Date: November 3, 1997
To: Scott Sheplak, BAR, FDEP
From: Kim Gates, EPA Region 4
Subj: Informal Comments on Draft Title V Permit
Facility: Gulf Power's Crist Electric Generating Plant

Attached are informal comments from EPA Region 4's Utility Permits Review Team on the above referenced facility. Some of these comments may also apply to the draft permit for Gulf Power's Scholtz Plant.

Our concerns need to be resolved in order to avoid possible objections to the proposed permits. Please contact me at 404/562-9124 to set up a conference call to discuss our comments and your resolution.

Attachment

Comments Summary

Draft Permit (#0330045) for Gulf Power's Crist Plant

(Comment #)	Comments Made to the Permitting Authority	Resolution
1.LH	The heat inputs for Units 004 through 007 are not consistent between the statement of basis and the permit text. The statement of basis has 490.9, 421.6, 3368, and 5824 million BTU per hour respectively for these units. Pages 2, 23, 38, 39 and 61 of the permit list these as 1096.7, 1096.7, 3704.8, and 6406.4 million BTU per hour, respectively. Additionally, both Units 004 and 005 are designated as 'Boiler Number 4' in the statement of basis and in the brief description in Subsection B on Page 22 of the permit.	
2.LH	Sections B.3 and C.3 state that on-site generated oil contaminated soil is periodically burned for energy recovery purposes. Are there limits on the rate this 'fuel' can be burned? Because of the nature of soil, would there be any possibility that the particulate mass limit would be violated during firing? Condition C.3 also lists injection of ammonia and sulfur trioxide as supplemental injections. Does this supplemental injection apply to Units 006 and 007 or to just one of the units? The statement of basis should include this information and why this injection is needed. Are there record keeping requirements for both the above issues? What is the projected annual usage of SO ₃ ?	
3.LH	Sections C.7 and C.8: An annual maximum mass emission rate (tons per year) is specified for Unit 006. Are there a maximum tons per year for units 004, 005, 007? For Unit 006, $8760 \times 0.1 \times 3368 = 1475$ tons. However, C.8 allows 0.3 for 3 hours each day. This would result in a calculation of $3368 \times 0.3 \times 3 \times 365 + 3368 \times 0.1 \times 21 \times 365 = 1844$ tons.	
4.LH	Section IV, Acid Rain Part, A.2. The table shows for emission point 004, a jump to 25040 tons sulfur dioxide in 2001 and 2002 from 2446 tons sulfur dioxide for 2000. Coincidentally, the figure 25040 is the value in 40 CFR Part 73 for Crystal River unit 5.	

5.DM	<p>A.14-5 and A.22. We are concerned about the lack of periodic monitoring provisions for particulate mass (PM) emissions and opacity for Units 1 through 3. The monitoring provisions in A.14-5 do not address PM and opacity periodic monitoring for Units 1 through 3, and according to the testing requirements in A.22, annual testing to verify compliance with PM and opacity limits is waived during any year in which liquid and/or solid fuels are burned for no more than 400 hours. If it is not necessary to conduct periodic monitoring to obtain the data used as the basis for the annual compliance certification, the statement of basis must be revised to explain the basis for this conclusion. In cases where a basis for waiving monitoring cannot be justified, an annual test alone will rarely be considered adequate periodic monitoring.</p> <p>Obviously, for periods of time when natural gas is combusted in Units 1 - 3, maintaining fuel usage records will constitute adequate periodic monitoring for both PM and opacity. In the case of fuel oil, however, the statement of basis must be revised to explain why no monitoring is necessary or adequate periodic monitoring provisions must be added to the permit. If a waiver of monitoring for the periods of time when oil is combusted is not justified in the statement of basis, the annual testing currently required in the permit must be supplemented with additional monitoring that can be used for certifying compliance with the PM and opacity limits. For the PM limit, Region 4 believes that keeping records to verify that the ash content of the oil combusted is consistent with that burned during tests conducted when compliance was demonstrated will be adequate. For the opacity standard, Region 4 believes that visible emissions data should be collected on at least a daily basis on the days during which oil is combusted.</p> <p>Unless a justification for waiving monitoring is provided in the statement of basis, Region 4 does not consider the number of hours during which oil is combusted to be a relevant factor to consider when deciding whether periodic monitoring is necessary when oil is combusted in Units 1 - 3. Gulf Power has an obligation to certify compliance with all applicable emission standards on an annual basis, and if no testing or monitoring is conducted, the company will not have any data to rely on as the basis for the certification of compliance with the PM and opacity limits for Units 1 - 3.</p>
6.DM	<p>The lack of a requirement for conducting periodic monitoring to obtain data that will be used as a basis for certifying compliance with the PM emission limit for the coal-fired units is unacceptable. Periodic monitoring for units that rely on the use of control equipment to comply with an applicable emission standard has been discussed by the Regional Title V Workgroup, and the consensus of the participating regions is that periodic stack testing alone does not constitute adequate periodic monitoring for such units. For units that rely on the use of control equipment to comply with an applicable PM emission standard, the consensus of the Title V Workgroup is that periodic monitoring tied to either control device operating parameters or to opacity is acceptable.</p>
7.DM	<p>Monitoring, Units 4-7 (Pages 25-26 for Units 4 and 5 and Pages 41- 42 for Units 6 and 7). Since certified opacity monitors are installed on Units 4 through 7, and since the permit indicates that these monitors will be used for determining compliance with the applicable opacity standard, a requirement to calibrate, operate, and maintain these monitors should be added to these sections of the permit.</p>

8.JJ

Condition A.14 establishes that compliance with the liquid sulfur limit will be verified by fuel analysis provided by the vendor upon each fuel delivery. Condition A.30 establishes the requirement that the owner or operator maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. It is unclear as to whether or not the "on specification" fuel oil is included in the fuel being supplied by an outside source providing vendor verification of the sulfur content (as required by Condition A.14) . If the used oil is not being supplied by the outside vendor, it is unclear how the owner or operator is to monitor the sulfur content of the oil. Condition A.34 establishes that the owner or operator must sample and analyze each batch of used oil to be burned for arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs, however, there does not appear to be any requirement that the owner or operator sample or analyze the "on specification" fuel oil for sulfur content.

V:\Comments\epa\ crist pH.wrd

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6000



October 28, 1997

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Dear Mr. Sheplak:

RE: **PLANT CRIST TITLE V PERMIT COMMENTS:**
DRAFT PERMIT No: 0330045-001-AV

Attached, please find Gulf Power's comments regarding the Draft Title V Permit (0330045-001-AV) issued on September 30, 1997 for the Crist Electric Generating Plant.

Please note that there has been an address change for Gulf Power Corporate Office to "One Energy Place, Pensacola, Fl 32520-0328" and the area code for all of Gulf Power locations has changed to (850). In addition to the area code change, Plant Crist has had a telephone number change to 850.429.5900. Please made these changes to your telephone directory for Gulf Power.

If you have any questions or need further information regarding our draft Title V permit comments, please call me at (850) 444.6527.

Sincerely,

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

G. Dwain Waters
Air Quality Programs Coordinator, QEP

cc: Robert G. Moore., Gulf Power Company
James O Vick, Gulf Power Company
J. W. Martin, Gulf Power Company
John Dominey, Gulf Power Company
Danny Herrin, Southern Company Services

RECEIVED

OCT 29 1997

BUREAU OF
AIR REGULATION

**PLANT CRIST TITLE V DRAFT PERMIT COMMENTS:
10/24/97**

SECTION I

Subsection A:

Page 2 Facility Description. In the third paragraph, it should be added that the permitting notes are not “enforceable” permit conditions to help clarify that not only is the purpose informational only, but that the notes are not intended to be enforced.

SECTION II

Facility-wide Conditions

Page 4 Condition 8. Reasonable Precautions to Prevent Unconfined Particulate Matter.

General Comment: At a meeting with the FCG, Department representatives agreed to add a permitting note to conditions such as this one stating that this more specific condition implements and effectively supersedes Condition 57 under Attachment TV-1 (the general, canned conditions) which is basically a quote from Rule 62-296.320(4)(c), F.A.C.

SECTION III

Subsection A:

Page 9 A 1. Permitted Capacity Lists permitted capacities of emissions unit numbers 001, 002 and 003.

Comment: Add notation that permitted capacity can not be accurately monitored or determined by use of continuous emission monitoring systems installed or operated pursuant to 40 CFR Part 75.

Page 9 A.4 Hours of Operation. Requires Units 1-2-3 to maintain an operations log available for Department inspection that documents the total hours of annual operation, including a detailed account of hours operated on each of the allowable fuels. 62-213.440 and 62-210.200(PTE).

Comment: Unit(s) should not be required to have a continuous log of operations. Requirement does not note if this is a daily, hourly, monthly or annual log. Compliance to applicable standards are through vendor fuel oil analysis or generally exempt from annual visible emissions and particulate testing by operating less than 400 hour per year on fuel oil. The current reporting under the AOR is all that should be required.

Page 10 A. 10. Sulfur Dioxide - Sulfur Content. Outlines compliance method for liquid fuel.

Comment: Can not determine applicability of rule cite 62-213.440, F.A.C. The correct citation should be the applicant's request, rather than Rule 21-213.440, F.A.C.

Page 11 Monitoring of Operations. Permitting note stating that these units (Crist 1-2-3) meet Acid Rain Phase II requirements having continuous emission monitors installed for NOx, CO2 and stack gas flow.

Comment: Crist 1-2-3 meet Acid Rain Phase II 40 CFR Part 75 CEMs rules by Appendix D methods for SO2 and flow. Nox emissions monitored by use of a continuous emission monitor.

Page 11 A.15 Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter and SO2 is an annual 3 run hourly test. It should be noted that heat input (mmbtu/hr) for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/mmbtu) can be determined by the F-factor method as outlined in A.19 during this test. SO2 process variables are determined by vendor fuel analysis.

Page 11 A.15 Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated, calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. Rule 62-297.310(5)

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO2 compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing.

Page 13 A.22 Frequency of Compliance Test. (a) General Compliance Testing. 2. Requires annual particulate test for units that soot blow during normal unit operation, except for fossil fuel steam generators that do not burn liquid and/or solid fuel for more than 400 hours other than startup.

Comment: Add other than startup or shutdown operations.

Page 13 A.22 Frequency of Compliance Test. (a) General Compliance Testing. 3. Requires submission of emission compliance test results for any emissions unit that, during the year prior to renewal: b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.

Comment: Add other than during startup/shutdown. Also, the Department should add at the beginning of the sentence: "Except as otherwise provided in this permit..." See similar language in rule.

Page 13. A.22 Frequency of Compliance Test. (a) General Compliance Testing. 4. Requires a formal compliance test for a. Visible emissions, if there is an applicable standard.

Comment: Add reference to FCG exemption letter dated January 28, 1997 noting no visible emissions tests are required for units that burned liquid and/or solid fuel for a total of no more than 400 hours other than during startup/shutdown.

Page 14 A.22 Frequency of Compliance Test. (a) General Compliance Testing. 5. Requires an annual compliance test for particulate matter emissions for any fuel burning emissions unit that does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.

Comment: Add other than during startup or shutdown.

Page 18 A.27. Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter and SO₂ is an annual 3 run hourly test. It should be noted that heat input (mmbtu/hr) for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/mmbtu) can be determined by the F-factor method as outlined in A.19 during this test. SO₂ process variables are determined by vendor fuel analysis. **Same comment as A.15 above. Delete Condition A.27(a) Required Equipment.**

Page 18 A.27 Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated, calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. Rule 62-297.310(5)

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO₂ compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing. **Same comment as item A.15 above. Delete Condition A.27 (b) Accuracy of Equipment.**

Page 18 A.28. Visible Emissions Testing - Annual. Requires annual emissions compliance testing for visible emissions unless these units burn b. gaseous fuels in combination with any amount of liquid fuel for less than 400 hours per year. Rule 62-297.310(7)(a)4.

Comment: Add other than during startup and shutdown per year.

Page 18. A.28. Visible Emissions Testing - Annual. Requires annual emissions compliance testing for visible emissions unless these units burn c. only liquid fuel(s) for less than 400 hours per year. Rule 62-297.310(7)(a)4

Comment: Add other than during startup and shutdown per year.

Page 18 A.29. Particulate Matter Testing - Annual and Permit Renewal. Requires annual and permit renewal emissions compliance testing for particulate matter unless these units burn b. gaseous fuels in combination with any amount of liquid fuel for less than 400 hours per year. Rule 62-297.310(7)(a)3.&5.

Comment: Add other than during startup and shutdown per year.

Page 18. A.29. Particulate Matter Testing - Annual and Permit Renewal. Requires annual emissions and permit renewal emissions compliance testing for particulate matter unless these units burn c. only liquid fuel(s) for less than 400 hours per year. Rule 62-297.310(7)(a)3.&5. and ASP # 97-B-01.

Comment: Add other than during startup and shutdown per year.

Page 18 A.30. Recordkeeping and Reporting Requirements. Requires owner or operator to maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. Rule 62-214.440 and 62-4.070(3) F.A.C.

Comments: Unit(s) should not be required to maintain continuous records of fuel consumption if the unit accepts a percent sulfur restriction for sulfur dioxide compliance for liquid fuels or burns gas. Liquid fuel is monitored by as-received vendor fuel analysis. See condition A.20. Only annual reporting under the Annual Operating Report should be required.

Page 18 A.31. Recordkeeping and Reporting Outline notification and reporting requirements in case of excess emissions resulting from malfunctions.

Comment: It should be noted that notification to the Department is required after the two hour daily exemption has occurred and not from any malfunction.

Page 20 A.34. e Testing Requirements: Outline testing requirements for used oil.

Comment: Used oil for which the operator has generator knowledge having no possibility of contamination by PCB should not be required to test for PCBs.

Page 21 A.34. f RecordKeeping Requirements: The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (1): Condition requires the source to maintain records of quantities of used oil generated that is transferred into the approved AST (above ground storage tank) at the source.

Comments: Current procedures allow the AST to be batch-tested once it is filled and that quantity burned. It is overly burdensome to maintain records of each volume of oil added to the AST during any period. Additionally, there is no regulatory requirement for records to be completed by any specified date, particularly arbitrarily derived dates.

Page 21 A.34. f. RecordKeeping Requirements The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (2): Requires records of used oil management to completed by no later than the fifteenth day of the succeeding month.

Comment: There is no regulatory requirement for any specified date for record keeping completion purposes. The Department's language in this part of the proposed condition regarding consecutive 12 month periods is not consistent with earlier provisions which talk about a calendar year limitation on the total quantity of used oil that can be burned. Delete this requirement.

Page 21 A.34. g. Reporting Requirements. Requires the source to report to the Northwest District office within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

Comment: There is no current regulatory requirement for quarterly reporting of used oil activities to the District. Current reporting through the Annual Operating Reporting should be adequate to meet monitoring of on-specification used oil activities.

NOTE: Cite [40 CFR 761.20(e)] is not applicable to these conditions; this cite addresses marking requirements for PCB containers.

Subsection B:

Page 22. B.1 Permitted Capacity. Lists permitted capacities of emissions unit numbers 004 and 005.

Comment: Add notation that permitted capacity can not be accurately monitored or determined by use of continuous emission monitoring systems installed or operated pursuant to 40 CFR Part 75.

Page 23 B.4 Hours of Operation. Requires Units 4 & 5 to maintain an operations log available for Department inspection that documents the total hours of annual operation, including a detailed account of hours operated on each of the allowable fuels. 62-213.440 and 62-210.200(PTE).

Comment: Unit(s) should not have to keep a continuous log of operations. Requirement does not note if this is a daily, hourly, monthly or annual log. These units maintain compliance to SO2 standards through CEMS. The current reporting under the AOR is all that should be required.

Page 25 B.17 Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter is an annual 3 run hourly test and SO2 is a 24 hour daily average using CEMS data. It should be noted that heat input for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/mmbtu) can be determined by the F-factor method outlined in B.21. during the test. Daily (24 hour) SO2 emission rates shall be determined by CEM monitors on a real time basis outlined in B.23.

Page 25 B.17 Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated, calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. Rule 62-297.310(5)

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO2 compliance has QA/QC procedures associated with the acid rain program and meet QC provisions in B.23. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing.

Page 25 B.18 Annual Tests Required. Requires annual tests for SO2 and PM.

Comment: Annual testing for SO2 should not be required since CEMs are used for compliance.

Page 25 B.19. Visible Emissions Notes permittee has elected to utilize a transmissometer (opacity meter) for demonstrating compliance with the visible emissions limit.

Comment: Gulf Power's continuous emission monitors for opacity only records and reports opacity in block 6 minute intervals.

Page 27 B.23. Monitoring of Operations. Requires continuous SO2 emission monitoring using 24 hour averages with standards of the Department (See Specific Condition 4)

Comment: Specific Condition 4 is Hours of Operation. The correct reference should be Specific Condition B.9 Sulfur Dioxide - Solid Fuel and B.10 Sulfur Dioxide - Liquid Fuel. Also, Delete "immediately initiate as-fired fuel sampling" to language outlined in the existing permit, i.e. 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.

Page 27 B.25. Fuel Sampling and Analysis. Outline various ASTM procedures for use to demonstrate compliance with the sulfur dioxide standard in the event that the SO₂ CEM is not able to capture valid data.

Comment: Section (a) and (c) should be deleted and replaced with the provision that the source has accepted a sulfur percent limit for fuel oil and that limit will be verified with a fuel analysis provided by the vendor upon each fuel delivery. Additionally, references to the density of the fuel oil in Section (e) should be deleted. Added to Section (f), it should be noted that if fuel oil is consumed during a day when these procedures are used that the latest fuel oil analysis will be used to calculate the SO₂ emission rate.

Page 30 B.29. Operating Rate During Testing. Outlines that testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.

Comment: Since capacity is defined as heat input in MMBTU/hour. Specific reference needs to be made that heat input shall be determined by fuel consumption calculations from data collected and analyzed during the reference tests and averaged over the test runs. If fuel consumption data is not available, then the source may select to use data calculated from EPA Reference Method 2 & 3 collected during the reference tests and averaged over the tests.

Page 32. B.31. Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter is an annual 3 run hourly test and SO₂ is a 24 hour daily average using CEMS data. It should be noted that heat input for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/mmbtu) can be determined by the F-factor method outlined in B.21. during the test. Daily (24 hour) SO₂ emission rates shall be determined by CEM monitors on a real time basis outlined in B.23 See B. 17 for the same comments. **Delete Condition B.31(a) Required Equipment.**

Page 32 B. 31. Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated, calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. Rule 62-297.310(5)

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO₂ compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing. See B.17 for the same comments. **Delete Condition B.31(b) Accuracy of Equipment.**

Page 32 B.32. Recordkeeping and Reporting Requirements. Requires owner or operator to maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. Rule 62-214.440 and 62-4.070(3) F.A.C.

Comments: Unit(s) should not have to maintain continuous records of fuel consumption if the unit accepts continuous emissions monitoring as a compliance method and accepts a percent sulfur restriction for sulfur dioxide compliance for liquid fuels and burns gas. Liquid fuel is monitored by as-received vendor fuel analysis. See condition A.20. Only annual reporting under the Annual Operating Report should be required.

Page 32 B.33. Recordkeeping and Reporting Outline notification and reporting requirements in case of excess emissions resulting from malfunctions.

Comment: It should be noted that notification to the Department is required after the two hour daily exemption has occurred and not from any malfunction.

Page 35 B.37. e. Testing Requirements: Outline testing requirements for used oil.

Comment: Used oil for which the operator has generator knowledge having no possibility of contamination by PCB should not be required to test for PCBs.

Page 35 B.37. f. RecordKeeping Requirements: The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (1): Condition requires the source to maintain records of quantities of used oil generated that is transferred into the approved AST (above ground storage tank) at the source.

Comments: Current procedures allow the AST to be batch-tested once it is filled and that quantity burned. It is overly burdensome to maintain records of each volume of oil added to the AST during any period. Additionally, there is no regulatory requirement for records to be completed by any specified date, particularly arbitrarily derived dates.

Page 35 B.37. f. RecordKeeping Requirements The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP(Best Management Practices). (2): Requires records of used oil management to completed by no later than the fifteenth day of the succeeding month.

Comment: There is no regulatory requirement for any specified date for record keeping completion purposes. The Department's language in this part of the proposed condition regarding consecutive 12 month periods is not consistent with earlier provisions which talk about a calendar year limitation on the total quantity of used oil that can be burned. Delete this requirement.

Page 35 B.37. g. Reporting Requirements. Requires the source to report to the Northwest District office within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

Comment: There is no current regulatory requirement for quarterly reporting of used oil activities to the District. Current reporting through the Annual Operating Reporting should be adequate to meet monitoring of on-specification used oil activities.

NOTE: Cite [40 CFR 761.20(e)] is not applicable to these conditions; this cite addresses marking requirements for PCB containers.

Subsection C:

Page 36 Description of Emission Units Crist 6 & 7.

Comments: Description makes note of NOx emissions from unit -007 are controlled by Foster Wheeler Low NOx Burners. Crist Unit 006 has the same control system without reference in the description. Add Crist 006 to the reference.

Page 36 C.1. Permitted Capacity Lists permitted capacities of emissions unit numbers 006 and 007.

Comment: Add notation that permitted capacity can not be accurately monitored or determined by use of continuous emission monitoring systems installed or operated pursuant to 40 CFR Part 75.

Page 37 C.4 Hours of Operation. Requires Units 6 & 7 to maintain an operations log available for Department inspection that documents the total hours of annual operation, including a detailed account of hours operated on each of the allowable fuels. 62-213.440 and 62-210.200(PTE).

Comment: Unit(s) should not have to keep a continuous log of operations. Requirement does not note if this is a daily, hourly, monthly or annual log. These units maintain compliance to SO2 standards through CEMS. The current reporting under the AOR is all that should be required.

Page 37 C.7. Particulate Matter. Requires particulate matter from unit 6 shall not exceed 1,475 tons/year.

Comment: Calculation in error; The correct particulate matter limit per year for Crist 6 should be 1,622.7 tons/year. This should not be a specific condition, perhaps a non-enforceable permitting note. The Department rule cite does not require an annual mass particulate emission limitation. This information was originally listed in the Unit 6 ESP Construction Permit for information only.

Page 38 C.9. Sulfur Dioxide - Solid Fuel. Requires sulfur dioxide emissions to be limited to 87,035 tons/year for Crist 6.

Comment: Calculation in error; The correct sulfur dioxide limit per year for Crist 6 should be 95,739 tons/year. This should not be a specific condition, perhaps a non-enforceable permitting note. The Department rule cite does not require an annual SO2 emission limitation. This information was originally listed in the Unit 6 ESP Construction Permit for information only.

Page 39. C.17. Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter is an annual 3 run hourly test and SO2 is a 24 hour daily average using CEMS data. It should be noted that heat input for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/mbtu) can be determined by the F-factor method outlined in C. 21 during the test. Daily (24 hour) SO2 emission rates shall be determined by CEM monitors on a real time 24 hour basis as outlined in C.23.

Page 39 C. 17. Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated, calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. Rule 62-297.310(5)

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO₂ compliance has QA/QC procedures associated with the acid rain program and meet QC provisions in C.23. Equipment associated with determination of capacity and/or heat input during particulate emissions testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing.

Page 39 C.18. Annual Tests Required . Requires annual tests for SO₂ and PM emissions in accordance with listed requirements.

Comments: Unclear on how compliance is determined for SO₂. Addition should be made to this section noting SO₂ compliance is determined by CEMs as outlined in section C.23. (See similar language used under visible emissions in section C.19)

Page 39 C.19. Visible Emissions Notes permittee has elected to utilize a transmissometer (opacity meter) for demonstrating compliance with the visible emissions limit.

Comment: Gulf Power's continuous emission monitors for opacity only records and reports opacity in block 6 minute intervals.

Page 41 C.23. Monitoring of Operations. Requires continuous SO₂ emission monitoring using 24 hour averages with standards of the Department (See Specific Condition 4)

Comment: Specific Condition 4 is Hours of Operation. The correct reference should be Specific Condition C.9 Sulfur Dioxide - Solid Fuel and C.10 Sulfur Dioxide - Liquid Fuel. Also, Delete "immediately initiate as-fired fuel sampling" to language outlined in the existing permit, i.e. 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.

Page 41 C.25. Fuel Sampling and Analysis. Outline various ASTM procedures for use to demonstrate compliance with the sulfur dioxide standard in the event that the SO₂ CEM is not able to capture valid data.

Comment: Section (a) and (c) should be deleted and replaced with the provision that the source has accepted a sulfur percent limit for fuel oil and that limit will be verified with a fuel analysis provided by the vendor upon each fuel delivery. Additionally, references to the density of the fuel oil in Section (e) should be deleted. Added to Section (f), it should be noted that if fuel oil is consumed during a day when these procedures are used that the latest fuel oil vendor analysis will be used to calculate the SO₂ emission rate.

Page 44 C.29. Operating Rate During Testing. Outlines that testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.

Comment: Since capacity is defined as heat input in mmbtu/hour. Specific reference needs to be made that heat input shall be determined by fuel consumption calculations from data collected and analyzed during the reference tests and averaged over the test runs. If fuel consumption data is not available, then the source may select to use data calculated from EPA Reference Method 2 & 3 collected during the reference tests and averaged.

Page 46 C.32. Recordkeeping and Reporting Requirements. Requires owner or operator to maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. Rule 62-214.440 and 62-4.070(3) F.A.C.

Comments: Unit(s) should not have to maintain continuous records of fuel consumption if the unit accepts continuous emissions monitoring as a compliance method and accepts a percent sulfur restriction for sulfur dioxide compliance for liquid fuels and burns gas. Liquid fuel is monitor though as-received fuel analysis. See condition A.20. Only annual reporting under the Annual Operating Report should be required.

Page 46 C.33. Recordkeeping and Reporting Outline notification and reporting requirements in case of excess emissions resulting from malfunctions.

Comment: It should be noted that notification to the Department is required after the two hour daily exemption has occurred and not from any malfunction.

Page 48 C.37. e. Testing Requirements: Outline testing requirements for used oil.

Comment: Used oil for which the operator has generator knowledge having no possibility of contamination by PCB should not be required to test for PCBs.

Page 48 C.37. f. RecordKeeping Requirements: The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (1): Condition requires the source to maintain records of quantities of used oil generated that is transferred into the approved AST(above ground storage tank) at the source.

Comments: Current procedures allow the AST (above ground storage tank) to be batch-tested once it is filled and that quantity burned. It is overly burdensome to maintain records of each volume of oil added to the AST during any period. Additionally, there is no regulatory requirement for records to be completed by any specified date, particularly arbitrarily derived dates.

Page 46 C.37. f. RecordKeeping Requirements The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (2): Requires records of used oil management to completed by no later than the fifteenth day of the succeeding month.

Comment: There is no regulatory requirement for any specified date for record keeping completion purposes. The Department's language in this part of the proposed condition regarding consecutive 12 month periods is not consistent with earlier provisions which talk about a calendar year limitation on the total quantity of used oil that can be burned. Delete this requirement.

Page 46 C.37. g. Reporting Requirements. Requires the source to report to the Northwest District office within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

Comment: There is no current regulatory requirement for quarterly reporting of used oil activities to the District. Current reporting though the Annual Operating Reporting should be adequate to meet monitoring of on-specification used oil activities.

NOTE: Cite [40 CFR 761.20(e)] is not applicable to these conditions; this cite addresses marking requirements for PCB containers.

Subsection D:

Page 52 D.12. Recordkeeping and Reporting Outline notification and reporting requirements in case of excess emissions resulting from malfunctions.

Comment: It should be noted that notification to the Department is required after the two hour daily exemption has occurred and not from any malfunction.

SECTION IV ACID RAIN PART:

Page 55 EU-004. Outlines SO2 Allowances for years 2000, 2001, 2002.

Comments: Error in SO2 Allowances for years 2001 and 2002. The correct value should be 2446.

Page 56 A.4 Comments, notes and justifications. Notes Designated Representative history.

Comments: Add most recent change from G. Edison Holland, Jr. to Robert G. Moore. Additionally, it should be noted that this specific condition should be changed to an unenforceable "permitting note" since this information can and will change frequently with appropriate notice.

APPENDIX E-1

General Comment: Many of the list of trivial or insignificant activities noted under the facility section and the applicant's "Emissions Unit 10" outlined in the Crist Title V Application were not included in the final permit. Gulf Power assumes that these activities and units not listed in the permit were determined to be either exempt or unregulated as "Trivial" by the Department's guidance memorandum dated March 15, 1996 or agreed to by the Department as case by case trivial activities requiring no permitting action.

APPENDIX U-1

General Comment: Fugitive PM emissions from Sandblasting are not listed as an unregulated emissions as outlined in the Crist Title V Application under Emissions Unit 10. Addition of this activity is requested.

TABLE 1-1

Comment: See attached Table 1-1 for corrections.

TABLE 2-1

Comment: See attached Table 2-1 for corrections.

Table 1-1, Summary of Air Pollutant Standards and Terms

Gulf Power Company
Crist Generating Plant

DRAFT Permit No.: 0330045-001-AV
Facility ID No.: 0330045

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of the permit.

E. U. ID No.	Brief Description	Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See Permit Condition(s)
					Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
-001	Boiler #1 (320 MMBtu/hour -N.G.) (320 MMBtu/hour -Oil)	VE	Natural Gas	8,760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5.
			Fuel Oil	8,760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5.
	PM	Natural Gas	8,760	0.1 lb/MMBtu	N/A	N/A	32.0	140.2	62-296.405(1)(b)	A.7.	
		Fuel Oil	8,760	0.1 lb/MMBtu	N/A	N/A	32.0	140.2	62-296.405(1)(b)	A.7.	
	PM - SB **	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	96.0	52.4 175.2	62-210.700(3)	A.8.	
		Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	96.0	52.4 175.2	62-210.700(3)	A.8.	
	SO ₂	Natural Gas	8,760	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
		Fuel Oil	8,760	1.98 lb/MMBtu	N/A	N/A	633.6	2,775.2	62-296.405(1)(c)1.e.	A.9.	
-002	Boiler #2 (320 MMBtu/hour -N.G.) (320 MMBtu/hour -Oil)	VE	Natural Gas	8,760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5.
			Fuel Oil	8,760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5.
	PM	Natural Gas	8,760	0.1 lb/MMBtu	N/A	N/A	32.0	140.2	62-296.405(1)(b)	A.7.	
		Fuel Oil	8,760	0.1 lb/MMBtu	N/A	N/A	32.0	140.2	62-296.405(1)(b)	A.7.	
	PM - SB **	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	96.0	52.4 175.2	62-210.700(3)	A.8.	
		Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	96.0	52.4 175.2	62-210.700(3)	A.8.	
	SO ₂	Natural Gas	8,760	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
		Fuel Oil	8,760	1.98 lb/MMBtu 0.5% Sulfur	N/A	N/A	633.6	2,775.2	62-296.405(1)(c)1.e.	A.9.	
-003	Boiler #3 (550 MMBtu/hour -N.G.) (550 MMBtu/hour -Oil)	VE	Natural Gas	8,760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5.
			Fuel Oil	8,760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5.
	PM	Natural Gas	8,760	0.1 lb/MMBtu	N/A	N/A	55.0	240.9	62-296.405(1)(b)	A.7.	
		Fuel Oil	8,760	0.1 lb/MMBtu	N/A	N/A	55.0	240.9	62-296.405(1)(b)	A.7.	
	PM - SB **	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	165.0	90.3 301.1	62-210.700(3)	A.8.	
		Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	165.0	90.3 301.1	62-210.700(3)	A.8.	
	SO ₂	Natural Gas	8,760	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
		Fuel Oil	8,760	1.98 lb/MMBtu 0.5% Sulfur	N/A	N/A	633.6	4089.6 37.0	7,791.8 164.6	62-296.405(1)(c)1.e.	A.9.

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Table 1-1, Summary of Air Pollutant Standards and Terms

Gulf Power Company
Crist Generating Plant

DRAFT Permit No.: 0330045-001-AV
Facility ID No.: 0330045

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of the permit.

E. U. ID No.	Brief Description	Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions *		Regulatory Citation(s)	See Permit Condition(s)
					Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
-004	Boiler #4 (1,096.7 MMBtu/hour - Coal) (1,096.7 MMBtu/hour - N.G.) (1,096.7 MMBtu/hour - Oil)	VE	Coal	8,760	40%			N/A	N/A	62-296.405(1)(a)	B.5.
			Natural Gas	8,760	40%			N/A	N/A	62-296.405(1)(a)	B.5.
			Fuel Oil	8,760	40%			N/A	N/A	62-296.405(1)(a)	B.5.
		PM	Coal	8,760	0.1 lb/MMBtu	N/A	N/A	109.7	480.4	62-296.405(1)(b)	B.7.
			Natural Gas	8,760	0.1 lb/MMBtu	N/A	N/A	109.7	480.4	62-296.405(1)(b)	B.7.
			Fuel Oil	8,760	0.1 lb/MMBtu	N/A	N/A	109.7	480.4	62-296.405(1)(b)	B.7.
	-Substitution Phase I Acid Rain Unit	PM - SB	Coal	3 hr/day	0.3 lb/MMBtu	N/A	N/A	329.0	600.4	62-210.700(3)	B.8.
			Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	329.0	600.4	62-210.700(3)	B.8.
			Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	329.0	600.4	62-210.700(3)	B.8.
		SO ₂	Coal	8,760	5.90 lb/MMBtu	N/A	N/A	6,470.5	28,340.9	62-296.405(1)(c)2.c.	B.9.
Natural Gas			8,760	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Fuel Oil			8,760	2.75 lb/MMBtu	N/A	N/A	3,015.9	13,209.8	62-296.405(1)(c)1.j.	B.10.	
-005	Boiler #5 (1,096.7 MMBtu/hour - Coal) (1,096.7 MMBtu/hour - N.G.) (1,096.7 MMBtu/hour - Oil)	VE	Coal	8,760	40%			N/A	N/A	62-296.405(1)(a)	B.5.
			Natural Gas	8,760	40%			N/A	N/A	62-296.405(1)(a)	B.5.
			Fuel Oil	8,760	40%			N/A	N/A	62-296.405(1)(a)	B.5.
		PM	Coal	8,760	0.1 lb/MMBtu	N/A	N/A	109.7	480.4	62-296.405(1)(b)	B.7.
			Natural Gas	8,760	0.1 lb/MMBtu	N/A	N/A	109.7	480.4	62-296.405(1)(b)	B.7.
			Fuel Oil	8,760	0.1 lb/MMBtu	N/A	N/A	109.7	480.4	62-296.405(1)(b)	B.7.
	-Substitution Phase I Acid Rain Unit	PM - SB	Coal	3 hr/day	0.3 lb/MMBtu	N/A	N/A	329.0	600.4	62-210.700(3)	B.8.
			Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	329.0	600.4	62-210.700(3)	B.8.
			Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	329.0	600.4	62-210.700(3)	B.8.
		SO ₂	Coal	8,760	5.90 lb/MMBtu	N/A	N/A	6,470.5	28,340.9	62-296.405(1)(c)2.c.	B.9.
Natural Gas			8,760	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Fuel Oil			8,760	2.75 lb/MMBtu	N/A	N/A	3,015.9	13,209.8	62-296.405(1)(c)1.j.	B.10.	

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Table 1-1, Summary of Air Pollutant Standards and Terms

Gulf Power Company
Crist Generating Plant

DRAFT Permit No.: 0330045-001-AV
Facility ID No.: 0330045

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of the permit.

E. U. ID No.	Brief Description	Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See Permit Condition(s)
					Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
-006	Boiler #6 (3,704.8 MMBtu/hour - Coal) (3,704.8 MMBtu/hour - N.G.) (714.8 MMBtu/hour - Oil) -Acid Rain Phase I Unit	VE	Coal	8,760	40%			N/A	N/A	62-296.405(1)(a)	C.5.
			Natural Gas	8,760	40%			N/A	N/A	62-296.405(1)(a)	C.5.
			Fuel Oil	8,760	40%			N/A	N/A	62-296.405(1)(a)	C.5.
		PM	Coal	8,760	0.1 lb/MMBtu	N/A	1,475	370.5	1,475.0	62-296.405(1)(b)	C.7.
			Natural Gas	8,760	0.1 lb/MMBtu	N/A	1,475	370.5	1,475.0	62-296.405(1)(b)	C.7.
			Fuel Oil	8,760	0.1 lb/MMBtu	N/A	1,475	71.5	1,475.0	62-296.405(1)(b)	C.7.
		PM - SB **	Coal	3 hr/day	0.3 lb/MMBtu	N/A	1,475	1,111.4	1,475.0	62-210.700(3)	C.8.
			Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	1,475	1,111.4	1,475.0	62-210.700(3)	C.8.
			Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	1,475	214.4	1,475.0	62-210.700(3)	C.8.
		SO ₂	Coal	8,760	5.90 lb/MMBtu	N/A	87,035	21,858.3	87,035.0	62-296.405(1)(c)2.c.	C.9.
			Natural Gas	8,760	N/A	N/A	87,035	N/A	87,035.0	N/A	N/A
			Fuel Oil	8,760	2.75 lb/MMBtu	N/A	87,035	1,965.7	87,035.0	62-296.405(1)(c)1.j.	C.10.
-007	Boiler #7 (6,406.4 MMBtu/hour - Coal) (6,406.4 MMBtu/hour - N.G.) (1,282 MMBtu/hour - Oil) -Acid Rain Phase I Unit	VE	Coal	8,760	40%			N/A	N/A	62-296.405(1)(a)	C.5.
			Natural Gas	8,760	40%			N/A	N/A	62-296.405(1)(a)	C.5.
			Fuel Oil	8,760	40%			N/A	N/A	62-296.405(1)(a)	C.5.
		PM	Coal	8,760	0.1 lb/MMBtu	N/A	N/A	640.6	2,806.0	62-296.405(1)(b)	C.7.
			Natural Gas	8,760	0.1 lb/MMBtu	N/A	N/A	640.6	2,806.0	62-296.405(1)(b)	C.7.
			Fuel Oil	8,760	0.1 lb/MMBtu	N/A	N/A	128.2	561.5	62-296.405(1)(b)	C.7.
		PM - SB **	Coal	3 hr/day	0.3 lb/MMBtu	N/A	N/A	1,921.9	3,507.5	62-210.700(3)	C.8.
			Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	1,921.9	3,507.5	62-210.700(3)	C.8.
			Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	384.6	201.9	62-210.700(3)	C.8.
		SO ₂	Coal	8,760	5.90 lb/MMBtu	N/A	N/A	37,797.8	165,554.2	62-296.405(1)(c)2.c.	C.9.
			Natural Gas	8,760	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			Fuel Oil	8,760	2.75 lb/MMBtu	N/A	N/A	3,525.5	15,441.7	62-296.405(1)(c)1.j.	C.10.
-008	Fly Ash Silos (2)-150 tons/hr	VE	N/A	8,760	20%			N/A	N/A	62-296.320(4)(b)1.	D.4.

Notes:

- * The "Equivalent Emissions" listed are for informational purposes.
- ** PM - SB refers to "soot blowing" and "load change".

Table 2-1, Summary of Compliance Requirements

Gulf Power Company
Crist Generating Plant

DRAFT Permit No.: 0330045-001-AV

Facility ID No.: 0330045

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E. U. ID No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time	Frequency	Min. Compliance Test	CMS ¹	See Permit Condition(s)
					Frequency	Base Date ²	Duration		
-001	Boiler #1 (320 MMBtu/hour -N.G.)	VE	Natural Gas	DEP Method 9	Annually ³	Sept. 30	60 Minutes	No	A.15. - 17., 21., 24. - 27., 30. - 32.
			Fuel Oil	DEP Method 9	Annually ³	Sept. 30	60 Minutes	No	
	(320 MMBtu/hour -Oil)	PM	Natural Gas	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No	A.15., 18., 21. - 26., 28. - 32.
			Fuel Oil	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No	
-Acid Rain Phase II Unit	SO ₂	Fuel Oil	Fuel Sampling & Analysis Provided by Vendor			No	A.14., 15., 19. - 26., 29. - 32.		
-002	Boiler #2 (320 MMBtu/hour -N.G.)	VE	Natural Gas	DEP Method 9	Annually ³	Sept. 30	60 Minutes	No	A.15. - 17., 21., 24. - 27., 30. - 32.
			Fuel Oil	DEP Method 9	Annually ³	Sept. 30	60 Minutes	No	
	(320 MMBtu/hour -Oil)	PM	Natural Gas	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No	A.15., 18., 21. - 26., 28. - 32.
			Fuel Oil	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No	
-Acid Rain Phase II Unit	SO ₂	Fuel Oil	Fuel Sampling & Analysis Provided by Vendor			No	A.14., 15., 19. - 26., 29. - 32.		
-003	Boiler #3 (550 MMBtu/hour -N.G.)	VE	Natural Gas	DEP Method 9	Annually ³	Sept. 30	60 Minutes	No	A.15. - 17., 21., 24. - 27., 30. - 32.
			Fuel Oil	DEP Method 9	Annually ³	Sept. 30	60 Minutes	No	
	(550 MMBtu/hour -Oil)	PM	Natural Gas	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No	A.15., 18., 21. - 26., 28. - 32.
			Fuel Oil	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No	
-Acid Rain Phase II Unit	SO ₂	Fuel Oil	Fuel Sampling & Analysis Provided by Vendor			No	A.14., 15., 19. - 26., 29. - 32.		

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E. U. ID No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date ²	Min. Compliance Test Duration	CMS ¹	See Permit Condition(s)	
-004	Boiler #4 (1,096.7 MMBtu/hour - Coal) (1,096.7 MMBtu/hour - N.G.) (1,096.7 MMBtu/hour - Oil)	VE	Coal	DEP Method 9 CEM	6-min Annually ³	Sept. 30	60 60 Minutes	Yes	B.15., 19., 20., 26, 29.-36.	
			Natural Gas	DEP Method 9 CEM	6-min Annually ³	Sept. 30	60 60 Minutes	Yes		
			Fuel Oil	DEP Method 9 CEM	6-min Annually ³	Sept. 30	60 60 Minutes	Yes		
	-Substitution Phase I Acid Rain Unit	PM	Coal	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No		B.17., 18., 21., 26. - 34., 36.
			Natural Gas	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No		
			Fuel Oil	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No		
	-Substitution Phase I Acid Rain Unit	SO ₂	Coal	6, 6A, 6B or 6C CEM	24-HOUR Annually ³	Sept. 30	24 24 Hour	Yes		B.15. - 18., 22. - 36.
			Natural Gas	6, 6A, 6B or 6C CEM	24-HOUR Annually ³	Sept. 30	24 24 Hour	Yes		
			Fuel Oil	6, 6A, 6B or 6C CEM	24-HOUR Annually ³	Sept. 30	24 24 Hour	Yes		
-005	Boiler #5 (1,096.7 MMBtu/hour - Coal) (1,096.7 MMBtu/hour - N.G.) (1,096.7 MMBtu/hour - Oil)	VE	Coal	DEP Method 9 CEM	6-min Annually ³	Sept. 30	60 60 Minutes	Yes	B.15., 19., 20., 26, 29.-36.	
			Natural Gas	DEP Method 9 CEM	6-min Annually ³	Sept. 30	60 60 Minutes	Yes		
			Fuel Oil	DEP Method 9 CEM	6-min Annually ³	Sept. 30	60 60 Minutes	Yes		
	-Substitution Phase I Acid Rain Unit	PM	Coal	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No		B.17., 18., 21., 26. - 34., 36.
			Natural Gas	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No		
			Fuel Oil	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No		
	-Substitution Phase I Acid Rain Unit	SO ₂	Coal	6, 6A, 6B or 6C CEM	24-HOUR Annually ³	Sept. 30	24 24 Hour	Yes		B.15. - 18., 22. - 36.
			Natural Gas	6, 6A, 6B or 6C CEM	24-HOUR Annually ³	Sept. 30	24 24 Hour	Yes		
			Fuel Oil	6, 6A, 6B or 6C CEM	24-HOUR Annually ³	Sept. 30	24 24 Hour	Yes		

Table 2-1, Summary of Compliance Requirements

Gulf Power Company
Crist Generating Plant

DRAFT Permit No.: 0330045-001-AV
Facility ID No.: 0330045

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E. U. ID No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time	Frequency	Min. Compliance Test	CMS ¹	See Permit Condition(s)	
					Frequency	Base Date ²	Duration			
-006	Boiler #6 (3,704.8 MMBtu/hour - Coal) (3,704.8 MMBtu/hour - N.G.) (714.8 MMBtu/hour - Oil)	VE	Coal	CEM DEP Method 9	Annually Annually ³	Sept. 30	60 60 Minutes	Yes	C.17., 19., 20., 24., 26., 29.-31., 33. - 36.	
			Natural Gas	CEM DEP Method 9	Annually Annually ³	Sept. 30	60 60 Minutes	Yes		
			Fuel Oil	CEM DEP Method 9	Annually Annually ³	Sept. 30	60 60 Minutes	Yes		
	PM	Coal	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No	C.17., 18., 21., 26. - 31., 33., 34., 36.		
		Natural Gas	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No			
		Fuel Oil	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No			
	-Acid Rain Phase I Unit	SO ₂	Coal	6, 6A, 6B or 6C CEM	Annually Annually ³	Sept. 30	24 24 Hour	Yes		C.15. - 18., 22. - 36.
			Natural Gas	6, 6A, 6B or 6C CEM	Annually Annually ³	Sept. 30	24 24 Hour	Yes		
			Fuel Oil	Fuel Sampling & Analysis Provided by Vendor			Yes			
	-007	Boiler #7 (6,406.4 MMBtu/hour - Coal) (6,406.4 MMBtu/hour - N.G.) (1,282 MMBtu/hour - Oil)	VE	Coal	CEM DEP Method 9	Annually Annually ³	Sept. 30	60 60 Minutes		Yes
Natural Gas				CEM DEP Method 9	Annually Annually ³	Sept. 30	60 60 Minutes	Yes		
Fuel Oil				CEM DEP Method 9	Annually Annually ³	Sept. 30	60 60 Minutes	Yes		
PM		Coal	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No	C.17., 18., 21., 26. - 31., 33., 34., 36.		
		Natural Gas	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No			
		Fuel Oil	17, 5, 5B or 5F	Annually ³	Sept. 30	1 Hour	No			
-Acid Rain Phase I Unit		SO ₂	Coal	6, 6A, 6B or 6C CEM	Annually Annually ³	Sept. 30	24 24 Hour	Yes	C.15. - 18., 22. - 36.	
			Natural Gas	6, 6A, 6B or 6C CEM	Annually Annually ³	Sept. 30	24 24 Hour	Yes		
			Fuel Oil	Fuel Sampling & Analysis Provided by Vendor			Yes			
-008		Fly Ash Silos (2)-150 tons/hr	VE	Fly Ash	EPA Method 9	Annually	Sept. 30	1 Hour	No	D.7. - 12.

Notes:

¹ CMS [=] continuous monitoring system used for monitoring requirement in lieu of fuel sampling and analysis if marked 'yes'.

(Acceptable as long as CMS is maintained and calibrated as required.)

² Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

³ Test not required in years that liquid and/or solid fuel fired less than 400 hours *other than startup/shutdown.*

⁴ ~~If a combustion turbine is operated less than 400 hours per year, test is only required once every 5 years, during the year prior to permit renewal.~~