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BUREAU OF AIR REGULATION

October 26, 2006



Ms. Trina L. Vielhauer
Bureau Chief
Bureau of Air Regulation
2600 Blair Stone Road MS 5500
Tallahassee, FL 32399-2400

**Re: Gulf Power Plant Crist Unit 7 Particulate Matter Emission Testing Petition
Permit Number 0330045-009-AV**

Dear Ms. Vielhauer:

This letter serves as Gulf Power's petition for the removal of the semi-annual particulate matter (PM) emission test requirement for Unit -007. This petition is provided in accordance with the permitting note associated with Condition C.23(b) of Title V permit number 0330045-009-AV. Gulf Power will continue to conduct annual PM emission tests in accordance with Condition C.23(a) of the same permit.

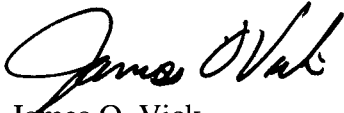
As shown in Table 1 below, the results of PM testing conducted over the previous 18 months demonstrate compliance with the applicable emission limiting standard. A total of seven PM emission tests have been conducted on Unit -007 since January 1, 2005 under varying operating conditions (steady state or soot blowing). The results of these tests indicate the average actual PM emission rate has never exceeded 30% of the allowable emission rate. These data serve to provide the Department with reasonable assurance that Unit -007 meets the PM emission limit and that the 15% CAM excursion level remains protective of the PM limit.

Table 1. Plant Crist Unit 7 PM Emission Test Results

Test Date	Test Condition	Average Actual Emission Rate (lb/mmBTU)	Allowable Emission Rate (lb/mmBTU)	Range of 6-Minute Opacity During Test
6/28/05	Steady State	0.008	0.10	6.5 – 7.9
6/29/05	Soot Blowing	0.01	0.30	5.6 – 11.4
9/22/05	Soot Blowing	0.012	0.30	5.1 – 6.8
9/23/05	Steady State	0.006	0.10	6.5 – 7.9
12/6/05	Steady State	0.03	0.10	4.6 – 6.2
6/13/06	Steady State	0.020	0.10	2.5 – 4.9
6/13/06	Soot Blowing	0.022	0.30	2.9 – 5.2

If you should have any questions concerning this letter, please feel free to contact me or Michael Kyhos at (850) 444-6144.

Sincerely,

A handwritten signature in black ink, appearing to read "James O. Vick". The signature is written in a cursive style with a large initial "J".

James O. Vick
Director of Environmental Affairs

Cc: Dwain Waters, Gulf Power
John Dominey, Gulf Power
John Rampulla, Gulf Power
Jonathan Holtom, FDEP