

Florida Department of Environmental Protection

Memorandum

TO: Trina Vielhauer, Bureau of Air Regulation
THROUGH: Jeff Koerner, Air Permitting North Program *JK*
FROM: Corrie Branum, Air Permitting North Program *CB*
DATE: October 10, 2007
SUBJECT: Draft Air Permit No. 0330045-019-AC, Air Construction Permit Revision
Draft Air Permit No. 0330045-020-AV, Concurrent Title V Permit Revision
Gulf Power Company.
Crist Electric Generating Plant
Unit 7 Cooling Tower Revision

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Statement of Basis;
- Technical Evaluation and Preliminary Determination;
- Draft Permits; and
- PE Certification

The purpose of this draft permit package is to revise emission unit 014 circulating water pump permitted capacity from 180,000 gpm to 190,000 gpm in air construction Permit No. 0330045-014-AC. In addition, a concurrent Title V revision is being issued to incorporate revisions reflected in air construction permit 0330045-019-AC. The Statement of Basis summarizes the facility, equipment, controls, primary rule applicability and describes the changes. The Technical Evaluation and Preliminary Determination summarizes the minor revisions to specific conditions from the air construction permit. The P.E. certification briefly summarizes the proposed project. I recommend your approval of the attached draft permits for this project.

Attachments

TV/clb



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

October 12, 2007

Ms. Penny Manuel, Vice President, Power Generation
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0100

Re: Draft Air Permit No. 0330045-019-AC, Air Construction Permit Revision
Draft Air Permit No. 0330045-020-AV, Concurrent Title V Permit Revision
Crist Electric Generating Plant
Unit 7 Cooling Tower Revision

Dear Ms. Manuel:

Enclosed is a permit package to revise the Title V air operation permit and the air construction permit for the new cooling tower at the Crist Electric Generating Plant. The facility is located in Escambia County at Pate Road (off of 10 Mile Road), Pensacola, Florida. Enclosed are the following documents:

- The Statement of Basis, which summarizes the facility, the equipment, the primary rule applicability, and the changes since the last Title V revision.
- The Technical Evaluation and Preliminary Determination, which summarizes the minor revisions to specific conditions from existing air construction permit.
- The draft air construction permit revision and the draft Title V air operation permit revision which include the specific conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permit, which provides: the Department's written notice of intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Department's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permit, which is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the project engineer, Jeff Koerner, at 850/921-9536.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an
Application for Air Permit by:

Gulf Power Company
One Energy Place
Pensacola, FL 32520-0001

Authorized Representative:
Penny Manuel, Vice President, Power Generation

Air Permit No. 0330045-019-AC
Air Construction Permit Revision
Air Permit No. 0330045-020-AV
Concurrent Title V Permit Revision
Crist Electric Generating Plant

Facility Location: Gulf Power Company operates the Crist Electric Generating Plant, which is located in Escambia County at Pate Road (off of 10 Mile Road) in Pensacola, Florida.

Project: The purpose of this project is to revise air Permit No. 0330045-014-AC and concurrently revise air Permit No. 0330045-016-AV. Permit No. 0330045-014-AC authorized Gulf Power to install and operate a 14 cell cooling tower for Crist Unit 7. The new cooling tower, which was completed and began service in April 2007, includes drift eliminators with a draft rate of 0.0005%. The existing pumps are undersized and cannot reliably provide adequate recirculating flow rate for the cooling. The applicant requests replacement of these pumps and an increase of the flow rate from 180,000 gpm to 190,000 gpm. The change results in a minor source air construction permit revision and a concurrent Title V revision.

Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, F.S. and Chapters 62-4, 62-210 and 62-213, F.A.C. The projects are not exempt from the permitting procedures for air construction and Title V air operation permits. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permits, the Statement of Basis, the Technical Evaluation and Preliminary Determination, the application, and the additional information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. Draft permit documents can be viewed at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Notice of Intent to Issue Permits: The Permitting Authority gives notice of its intent to issue a renewed Title V air operation permit and a concurrent air construction permit revision for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. The permitting authority will issue a final air construction permit revision and a proposed Title V air operation permit renewal (and subsequent final Title V air operation permit renewal) in accordance with the conditions of the Draft Permits unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the address or phone

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

number listed above. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments on the Draft Air Construction Permit Revision: The Permitting Authority will accept written comments concerning the proposed Draft Air Construction Permit Revision for a period of 14 days from the date of publication of the Public Notice. Written comments received must be post-marked by the Permitting Authority at the above address by 5:00 p.m. on or before the end of the 14-day comment period. If written comments result in a significant change to the Draft Permit, the Permitting Authority will issue a revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Comments on the Draft Title V Air Operation Permit Revision: The Permitting Authority will accept written comments concerning the draft Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments received must be post-marked by the Permitting Authority at the above address by 5:00 p.m. on or before the end of the 30-day period. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on the Title V permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the Draft Permit, the Permitting Authority will issue a revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decisions may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241; Fax: 850/245-2303). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within fourteen 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permits. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Objections to the Draft Title V Air Operation Permit: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any Title V permit. Any petition shall be based only on objections to the Title V permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any Title V permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

Executed in Tallahassee, Florida.

Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Public Notice, the Statement of Basis, the Technical Evaluation and Preliminary Determination, and the Draft Permits) was sent by electronic mail with received receipt requested before the close of business on 10/15/07 to the persons listed below.

- Ms. Penny Manuel, Gulf Power Company (pmmanuel@southernco.com)
- Mr. Theodore J McCullough, Gulf Power Company (tjmuccull@southernco.com)
- Mr. Glenn Waters, Gulf Power Company (gdwaters@southernco.com)
- Mr. Gregory N Terry, Gulf Power Company (gnterry@southernco.com)
- Ms. Kathleen Forney (Forney.Kathleen@epa.gov)
- Mr. Rick Bradburn, NWD Office (Rick.Bradburn@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk) Friday 10/15/07 (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection

Draft Air Permit No. 0330045-019-AC, Air Construction Permit Revision
Draft Air Permit No. 0330045-020-AV, Concurrent Title V Air Operation Permit Revision

Crist Electric Generating Plant
Escambia County, Florida

Applicant: The applicant for this project is the Gulf Power Company. The applicant's responsible official is Ms. Penny Manuel. The applicant's mailing address is One Energy Place, Pensacola, Florida 32520-0100.

Facility Location: Gulf Power Company operates an existing electrical generating power plant located in Escambia County at Pate Road (off of 10 Mile Road) in Pensacola, Florida. The UTM coordinates are Zone 478.27 km east and 3381.36 km north.

Project: The purpose of this project is to revise air Permit No. 0330045-014-AC and concurrently revise air Permit No. 0330045-016-AV. Permit No. 0330045-014-AC authorized Gulf Power to install and operate a 14 cell cooling tower for Crist Unit 7. The new cooling tower, which was completed and began service in April 2007, includes drift eliminators with a draft rate of 0.0005%. The existing pumps are undersized and cannot reliably provide adequate recirculating flow rate for the cooling. The applicant requests replacement of these pumps and an increase of the flow rate from 180,000 gpm to 190,000 gpm. The change results in a minor source air construction permit revision.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, F.S. and Chapters 62-4, 62-210 and 62-213, F.A.C. The projects are not exempt from the permitting procedures for air construction and Title V air operation permits. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permits, the Statement of Basis, the Technical Evaluation and Preliminary Determination, the application, and the additional information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. Draft permit documents can be viewed at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Notice of Intent to Issue Permits: The Permitting Authority gives notice of its intent to issue a Title V air operation permit and a concurrent air construction permit revision for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. The permitting authority will issue a final air construction permit revision and a proposed Title V air operation permit revision in accordance with the conditions of the Draft Permits unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments on the Draft Air Construction Permit Revision: The Permitting Authority will accept written comments concerning the proposed Draft Air Construction Permit Revision for a period of 14 days from the date of publication of the Public Notice. Written comments received must be post-marked by the Permitting Authority at the above address by 5:00 p.m. on or before the end of the 14-day comment period. If written comments result in a significant change to the Draft Permit, the Permitting Authority will issue a revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

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(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the Draft Permit, the Permitting Authority will issue a revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decisions may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241; Fax: 850/245-2303). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within fourteen 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permits. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Objections to the Draft Title V Air Operation Permit: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any Title V permit. Any petition shall be based only on objections to the Title V permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any Title V permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

(Public Notice to be Published in the Newspaper)

STATEMENT OF BASIS

FACILITY DESCRIPTION

Gulf Power Company operates the Crist Electric Generating Plant, which is located in Escambia County at Pate Road (off of 10 Mile Road) in Pensacola, Florida. The UTM coordinates are Zone 16, 478.27 km east and 3381.36 km north. This existing electrical generating plant (SIC No. 4911) consists of four fossil fueled fired steam generators (boilers), two fly ash silos, cooling towers and miscellaneous unregulated/insignificant emissions units and/or activities. Boilers 4 and 5 are substitution Acid Rain Phase I Units. Boilers 6 and 7 are Acid Rain Phase I Units. All four boilers are subject to the Acid Rain Phase II requirements. Pulverized coal is the primary fuel for boilers 4, 5, 6, and 7. Fuel oil is used as supplemental fuel in all four of the boilers. This Title V air operation permit revision only affects EU-014, Mechanical Draft Cooling Tower, which was constructed for Boiler 7 (EU-007).

PRIMARY REGULATORY REQUIREMENTS

Based on the Title V Air Operation Permit Revision application received September 25, 2007:

- The facility is a major source of hazardous air pollutants;
- The facility operates units subject to the acid rain provisions of the Clean Air Act;
- The facility is a Title V major source of air pollution in accordance with Chapter 213, Florida Administrative Code, (F.A.C.); and
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

PROJECT DESCRIPTION

On September 25, 2007, Gulf Power Company submitted an application to revise air Permit No. 0330045-014-AC and concurrently revise air Permit No. 0330045-016-AV. Construction air Permit No. 0330045-014-AC, authorized Gulf Power to install and operate a 14 cell cooling tower (EU-014) for Crist Unit 7. The new cooling tower, which was completed and began service in April 2007, includes drift eliminators with a draft rate of 0.0005%. The permit revisions reflected in air construction permit 0330045-019-AC increase the cooling tower circulating pumps from the current permitted capacity of 180,000 gpm to 190,000 gpm. This revision does not create a significant emissions increase.

CONCLUSION

This project revises Title V air operation permit No. 0330045-009-AV, which was issued on December 28, 2004. This Title V air operation permit revision is issued under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-210 and 62-213, F.A.C. In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawings, plans, and other documents, on file with the permitting authority.

DRAFT TITLE V PERMIT REVISION

This permitting action will add the following specific conditions in current Title V air operating Permit No. 0330045-020-AV as follows. Double underline notes added language; strike through notes deleted language.

Subsection F. This section addresses the following unregulated emissions units.

E.U. ID No. Brief Description

-014 Mechanical Draft Cooling Tower with a maximum circulation rate of 190,000 GPM.

The following specific conditions apply to the unregulated emissions unit listed above:

EMISSIONS AND PERFORMANCE REQUIREMENTS

E.1. Hours of Operation: The new cooling tower shall be allowed to operate 8,760 hours per year. [Rule 62-210.200 (PTE), F.A.C. and Permit No. 0330045-019-AC]

E.2. Cooling Tower Design: The cooling tower shall be designed and maintained to achieve a drift rate of no more than 0.0005% of the circulating water flow. [Permit No. 0330045-019-AC]

{Note: This equates to an estimated average emission rate of particulate matter (PM) from the cooling tower at 0.87 pounds per hour and 3.82 tons per year, based on an average TDS rate of 1,935 ppm. The PM₁₀ emissions are estimated to be approximately 60% of the estimated particulate matter emission rate.}

E.3. Circulating Water Flow Rate: Upon request, the applicant shall provide a means for determining the circulating water flow rate through the new cooling tower. [Rule 62-4.070, F.A.C. and Permit No. 0330045-019-AC]



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

Draft Permit No. 0330045-019-AC
Unit 7 Cooling Tower Revision

APPLICANT

Gulf Power Company
Crist Electric Generating Plant
ARMS Facility ID No. 0330045

COUNTY

Escambia County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
Air Permitting North Section
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

October 10, 2007

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. GENERAL PROJECT INFORMATION

Facility Description and Location

Gulf Power Company operates an existing electrical generating power plant (SIC No. 4911) located in Escambia County at Pate Road (off of 10 Mile Road) in Pensacola, Florida. The UTM coordinates are Zone 16, 478.27 km east and 3381.36 km north. The facility consists of four fossil fueled fired steam generators (boilers) and two fly ash silos. Boilers 4 and 5 are substitution Acid Rain Phase I Units. Boilers 6 and 7 are Acid Rain Phase I Units. All four boilers are subject to the Acid Rain Phase II requirements. Pulverized coal is the primary fuel for boilers 4, 5, 6, and 7. Fuel oil is used as supplemental fuel in all four of the boilers. This air construction permit modification only affects EU-014, Mechanical Draft Cooling Tower, which was constructed for Boiler 7 (EU-007).

Regulatory Categories

The facility is a major source of hazardous air pollutants.

The facility operates units subject to the acid rain provisions of the Clean Air Act.

The facility is a Title V major source of air pollution in accordance with Chapter 213, Florida Administrative Code, (F.A.C.).

The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

On September 25, 2007, the Department received an application from Gulf Power Company for the Crist Electric Generating Plant to revise air Permit No. 0330045-014-AC and concurrently revise air Permit No. 0330045-016-AV. Permit No. 0330045-014-AC, issued August 16, 2006, authorized Gulf Power to install and operate a 14 cell cooling tower (EU-014) for Crist Unit 7. The new cooling tower, which was completed and began service in April 2007, includes drift eliminators with a draft rate of 0.0005% and has a maximum circulation rate of 180,000 gpm. However, after startup, Gulf Power became aware that the circulating water pumps associated with the tower are undersized. Thus, operating at a higher electrical load than the pump specifications allowed, which may cause premature failure. Gulf Power plans to upgrade the cooling tower circulating pumps from the current permitted capacity of 180,000 gpm to 190,000 gpm. Therefore, Gulf Power requests that air construction Permit No. 0330045-014-AC and the current Title V Permit No. 0330045-016-AV be revised concurrently to reflect these changes.

2. APPLICABLE REGULATIONS

State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code. This project is subject to the applicable rules and regulations defined in the following Chapters of the F.A.C.: 62-4 (Permitting Requirements); 62-204 (Ambient Air Quality Requirements, Prevention of Significant Deterioration (PSD) Increments, and Federal Regulations Adopted by Reference); 62-210 (Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms); 62-212 (Preconstruction Review, PSD Review and BACT, and Non-attainment Area Review and LAER); 62-213 (Title V Air Operation Permits for Major Sources of Air Pollution); 62-296 (Emission Limiting Standards); and 62-297 (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures). PSD applicability and the preconstruction review requirements of Rule 62-212.400, F.A.C. are discussed in Section 4 of this report. Additional details of the other state regulations are provided in Section 4 of this report.

Federal Regulations

The Environmental Protection Agency establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 identifies New Source Performance Standards (NSPS) for a variety of industrial activities. Part 61 specifies National Emissions Standards for Hazardous Air Pollutant (NESHAP) based on specific pollutants. Part 63 specifies NESHAP provisions based on the Maximum Achievable Control Technology (MACT) for given source categories. Part 75 specifies the Acid Rain monitoring provisions. Federal regulations are adopted in Rule 62-204.800, F.A.C. Additional details of the applicable federal regulations are provided in Section 4 of this report.

3. PSD APPLICABILITY REVIEW

General PSD Applicability

The Department regulates major stationary sources in accordance with Florida’s PSD program pursuant to Rule 62-212.400, F.A.C. PSD preconstruction review is required in areas that are currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) or areas designated as “unclassifiable” for these regulated pollutants. As defined in Rule 62-210.200, F.A.C., a facility is considered a “major stationary source” if it emits or has the potential to emit 5 tons per year of lead, 250 tons per year or more of any PSD pollutant, or 100 tons per year or more of any PSD pollutant and the facility belongs to one of the 28 listed PSD major facility categories.

For major stationary sources, PSD applicability is based on emissions thresholds known as the “significant emission rates” as defined in Rule 62-210.200, F.A.C. Emissions of PSD pollutants from a project exceeding these rates are considered “significant” and the Best Available Control Technology (BACT) must be employed to minimize emissions of each PSD pollutant. Although a facility may be “major” for only one PSD pollutant, a project must include BACT controls for any PSD pollutant that exceeds the corresponding significant emission rate. In addition, applicants must provide an Air Quality Analysis that evaluates the predicted air quality impacts resulting from the project for each PSD pollutant.

PSD Applicability for the Project

The project is located in Escambia County, which is in an area that is currently in attainment with the state and federal AAQS or otherwise designated as unclassifiable. The facility is a fossil fuel-fired steam electric plant of more than 250 MMBtu per hour, which is one of the 28 listed PSD major facility categories, and emits or has the potential to emit 100 tons per year or more of at least one PSD pollutant. Therefore, the facility is a major stationary source and the project is subject to a PSD applicability review. As shown below, the requested revision does not result in a significant emissions increase and the project is not subject to PSD preconstruction review.

4. DEPARTMENT’S PROJECT REVIEW

Gulf Power is in the process of designing a Wet Flue Gas Desulphurization (WFGD) scrubber system at their Crist Electric Generating Plant in order to comply with future Clean Air Interstate Rule (CAIR) and Clean Air Mercury Rule (CAMR) regulations. The WFGD design required Gulf Power to construct a new 14 cell cooling tower for Crist Unit 7. Minor construction Permit No. 0330045-014-AC, issued August 16, 2006, authorized Gulf Power to construct a mechanical draft cooling tower with a maximum circulation rate of 180,000 gpm (EU-014) for Unit 7. In April 2007, EU-014 was complete and began service. Shortly after startup, Gulf Power realized that circulating pumps associated with the tower were undersized and operating at a higher electrical load than specified for the pump. Due to concerns for premature failure, Gulf Power requests that current permitted capacity of 180,000 gpm be increased to 190,000 gpm for EU-014. There will be a slight increase of annual emissions for particulate matter due to the pump capacity increasing to 190,000 gpm; however, the project remains well below the PSD applicability threshold.

Pollutant	Past Actual Annual Emissions (TPY)	Future Potential Annual Emissions (TPY) with 180,000 gpm	Future Potential Annual Emissions (TPY) with 190,000 gpm	PSD Threshold (TPY)	PSD Review Required
PM	1,400.38	3.82	4.03	25	No
PM ₁₀	840.22	2.29	2.41	15	No

The above calculations are based upon the paper “Calculating Realistic PM₁₀ Emissions from Cooling Towers” which is built upon the methodology presented in EPA’s AP-42, the portion of PM which is emitted as PM₁₀ decreases as the TDS in the circulating water increases. For this project, the average TDS of the brackish water (1,935 ppm) results in about a 60% fraction of PM₁₀ emissions. The Department does not render an opinion on the calculations of past actual emissions. This revision does not result in any emissions increases and does not trigger any new state or federal regulations. Therefore, the Department approves the request and will revise the permit accordingly.

5. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the Draft Permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the Draft Permit.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Corrie Branum is the project engineer responsible for reviewing the application and drafting the permit changes. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

PERMITTEE:

Gulf Power Company
Crist Electric Generating Plant
One Energy Place
Pensacola, Florida 32520

ARMS Permit No.	0330045-019-AC
Facility ID No.	0330045
SIC No.	4911
Expires:	December 31, 2007

Authorized Representative:

Penny Manuel
Vice President, Power Generation

PROJECT AND LOCATION

Permit No. 0330045-014-AC authorized the construction of a new 14-cell cooling tower for use with Crist Unit 7 to replace the old 12-cell cooling tower that must be removed to make room for a new wet flue gas desulfurization (WFGD) scrubber system. The project did not authorize any increase in heat input to Unit 7. The purpose of Permit No. 0330045-019-AC is to revise the maximum circulation rate from 180,000 gpm to 190,000 gpm for the new cooling tower. Therefore, Permit No. 0330045-019-AC supersedes Permit No. 0330045-014-AC.

The project will be located at the existing Crist Electric Generating Plant, located on Pate Road, off of 10 Mile Road, Escambia County, Florida.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

APPENDICES

The following Appendix is attached as part of this permit.

Appendix GC Construction Permit General Conditions

(DRAFT)

Joseph Kahn, Director
Division of Air Resource Management

SECTION I. GENERAL INFORMATION (DRAFT)

FACILITY DESCRIPTION

This facility consists of four fossil fuel fired steam generators (boilers) and two fly ash silos. Boilers 4 and 5 are substitution Acid Rain Phase I Units. Boilers 6 and 7 are Acid Rain Phase I Units. All four boilers are subject to the Acid Rain Phase II requirements. Pulverized coal is the primary fuel for boilers 4, 5, 6 and 7. Fuel oil is used as supplemental fuel in all four of the boilers.

PROJECT DESCRIPTION

The Project consists of the construction and operation of a new cooling tower (EU-014) comprised of 14 cells, with a width of 105', a length of 367.5', a height of 68', includes drift eliminators rated at 0.0005%, and operates at a maximum brackish-water flow rate of 190,000 gallons per minute for all cells combined. Brackish water is sprayed through the tower where fan induced air flow causes evaporative cooling. Water vapor, saltwater droplets (drift) and salt particles are emitted. Drift emissions are controlled by drift eliminators.

REGULATORY CLASSIFICATION

This facility is classified as a major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is within an industry included in the list of the 28 Major Facility Categories as defined for Major Stationary Sources in Rule 62-210.200, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a major facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). Based upon the construction permit application, the facility is a major source of hazardous air pollutants (HAP).

SECTION II. ADMINISTRATIVE REQUIREMENTS (DRAFT)

GENERAL AND ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation, Florida Department of Environmental Protection (Department), at 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400. The phone number is 850/488-0114 and the fax number is 850/921-9533.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications should be submitted to the Department's Northwest District Office, 160 Governmental Center, Pensacola, Florida 32502-5794. The phone number is 850/595-8300 and the fax number is 850/595-8417.
3. Terminology: The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code.
4. General Conditions: The owner and operator are subject to, and shall operate under, the attached General Conditions listed in *Appendix GC* of this permit. General Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
5. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 & 62-210.900, F.A.C.]
6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) & 62-212.300(1)(a), F.A.C.]
8. Title V Permit: This permit authorizes the construction of the permitted emissions unit and initial operation to demonstrate that the stated design parameters were achieved. A Title V operation permit revision is required for continued operation of the permitted emissions unit. The Permittee shall submit an application for a permit revision at least ninety days prior to the expiration date of this air construction permit, but no later than 180 days after the emissions unit commences operation. [Rules 62-4.030 & 62-213.420, F.A.C.]

SECTION III - EMISSIONS UNITS SPECIFIC CONDITIONS (DRAFT)

Cooling Tower (EU 014)

EMISSIONS UNITS

This section of the permit addresses the following new emissions unit.

ID	Emission Unit Description
014	Mechanical Draft Cooling Tower with a maximum circulation rate of 190,000 gpm.

EQUIPMENT

1. Cooling Tower: The permittee is authorized to construct a new 14-cell mechanical draft cooling tower with the following nominal design characteristics: a circulating water flow rate of 190,000 gpm; drift eliminators; and, a drift rate of no more than 0.0005% of the circulating water flow. [Application; Design]

EMISSIONS AND PERFORMANCE REQUIREMENTS

2. Hours of Operation: The new cooling tower shall be allowed to operate 8,760 hours per year. [Rule 62-210.200 (PTE), F.A.C.; Application]
3. Cooling Tower Design: The cooling tower shall be designed and maintained to achieve a drift rate of no more than 0.0005% of the circulating water flow. [Application; Design]

{Note: This equates to an estimated average PM emission rate from the cooling tower of 0.87 pounds per hour and 3.82 tons per year, based on an average TDS rate of 1,935 ppm. The PM₁₀ emissions are estimated to be approximately 60% of the estimated particulate matter emission rate.}
4. Circulating Water Flow Rate: Upon request, the applicant shall provide a means for determining the circulating water flow rate through the new cooling tower. [Rule 62-4.070, F.A.C.]
5. Drift Rate: Within 60 days of commencing operation, the permittee shall certify that the cooling tower was constructed and installed to achieve the specified drift rate. After this certification is provided, the cooling tower will be considered an unregulated emissions unit. [Rule 62-4.070, F.A.C.]

SECTION 4. APPENDIX GC
CONSTRUCTION PERMIT GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the

SECTION 4. APPENDIX GC
CONSTRUCTION PERMIT GENERAL CONDITIONS

Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (Not Applicable);
 - b. Determination of Prevention of Significant Deterioration (Not Applicable); and
 - c. Compliance with New Source Performance Standards (Not Applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

P.E. CERTIFICATION STATEMENT

PERMITTEE

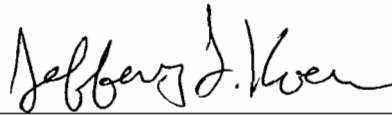
Gulf Power Company
Crist Electric Generating Plant
One Energy Place
Pensacola, Florida 32520

Draft Permit No. 0330045-019-AC
Minor Air Construction Permit Revision
Draft Permit No. 0330045-020-AV
Concurrent Title V Permit Revision
Crist Electric Generating Plant
Cooling Tower, Revised Flow Rate
Escambia County, Florida

PROJECT DESCRIPTION

Gulf Power is in the process of constructing a wet flue gas desulfurization scrubber system at the Crist Electric Generating Plant as part of their strategy for future CAIR and CAMR regulations. It was later determined that a new cooling tower was needed for Unit 7 (EU-014), which was authorized under Permit No. 0330045-014-AC. The cooling tower project was completed and the unit began service in April of 2007. Shortly after startup, it was determined that the circulating pumps for the cooling tower were undersized and required operation at higher electrical loads than specified for the pumps. Due to concerns for premature failure, Gulf Power requests replacement of the pumps and an increase in capacity from 180,000 gpm to 190,000 gpm. Although, this will cause a slight increase in potential PM/PM₁₀ emissions, total annual emissions are estimated at 4 tons/year of PM and 2 tons/year of PM₁₀, which are well below the corresponding PSD significant emissions rates of 25 and 15 tons/year. In addition, shutdown of the previously existing cooling tower resulted in large reductions (-1400 tons/year of PM and -840 tons/year of PM₁₀ as estimated by the plant). Therefore, the request is acceptable and Permit No. 0330045-019-AC will include the revision, which will be incorporated into concurrent Title V revisions (Project No. 0330045-020-AV).

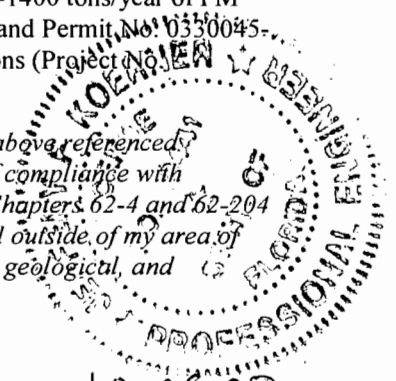
I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Jeffery F. Koerner, P.E.
Registration Number: 49441

10-09-07

(Date)



Friday, Barbara

To: pmmanuel@southernco.com; tjmuccull@southernco.com; gdwaters@southernco.com; gnterry@southernco.com; Forney.Kathleen@epamail.epa.gov; Bradburn, Rick

Cc: Branum, Corrie; Adams, Patty

Subject: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant

Attachments: 0330045-020-AV Statement of Basis.pdf; 0330045-014-AC Final Appendix GC.pdf; 0330045-019&020CombinedNoticeofIntent.pdf; 0330045-019-AC Draft Permit.pdf; 0330045-019-AC TEPD.pdf; 0330045-020-AV 1 Page TV Revision.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

10/15/2007

Friday, Barbara

From: Branum, Corrie
To: Friday, Barbara
Sent: Monday, October 15, 2007 3:23 PM
Subject: Read: New Posting #0330045

Your message

To: Gracy Danois; Kathleen Forney; Walker, Elizabeth (AIR)
Cc: Branum, Corrie
Subject: New Posting #0330045
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was read on 10/15/2007 3:23 PM.

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From: System Administrator
To: Branum, Corrie
Sent: Monday, October 15, 2007 3:23 PM
Subject: Delivered:DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant

Your message

To: 'pmmanuel@southernco.com'; 'tjmuccull@southernco.com'; 'gdwaters@southernco.com'; 'gnterry@southernco.com'; 'Forney.Kathleen@epamail.epa.gov'; Bradburn, Rick
Cc: Branum, Corrie; Adams, Patty
Subject: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant
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was delivered to the following recipient(s):

Branum, Corrie on 10/15/2007 3:23 PM

Friday, Barbara

From: System Administrator
To: Bradburn, Rick
Sent: Monday, October 15, 2007 3:23 PM
Subject: Delivered: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant

Your message

To: 'pmmanuel@southernco.com'; 'tjmuccull@southernco.com'; 'gdwaters@southernco.com'; 'gnterry@southernco.com'; 'Forney.Kathleen@epamail.epa.gov'; Bradburn, Rick
Cc: Branum, Corrie; Adams, Patty
Subject: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant
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was delivered to the following recipient(s):

Bradburn, Rick on 10/15/2007 3:23 PM

Friday, Barbara

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To: Adams, Patty
Sent: Monday, October 15, 2007 3:23 PM
Subject: Delivered: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant

Your message

To: 'pmmanuel@southernco.com'; 'tjmuccull@southernco.com'; 'gdwaters@southernco.com'; 'gnterry@southernco.com'; 'Forney.Kathleen@epamail.epa.gov'; Bradburn, Rick
Cc: Branum, Corrie; Adams, Patty
Subject: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant
Sent: 10/15/2007 3:23 PM

was delivered to the following recipient(s):

Adams, Patty on 10/15/2007 3:23 PM

Friday, Barbara

From: Adams, Patty
To: Friday, Barbara
Sent: Monday, October 15, 2007 3:23 PM
Subject: Read: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant

Your message

To: 'pmmanuel@southernco.com'; 'tjmuccull@southernco.com'; 'gdwaters@southernco.com'; 'gnterry@southernco.com'; 'Forney.Kathleen@epamail.epa.gov'; Bradburn, Rick
Cc: Branum, Corrie; Adams, Patty
Subject: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant
Sent: 10/15/2007 3:23 PM

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Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]
Sent: Monday, October 15, 2007 3:23 PM
To: Friday, Barbara
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(489 B)

Message
Headers.txt (2 KB)

This is the mail system at host mseive02.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250
OK, sent 4713BE1A_5452_86942_1

Friday, Barbara

From: Bradburn, Rick
To: Friday, Barbara
Sent: Monday, October 15, 2007 3:24 PM
Subject: Read: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant

Your message

To: 'pmmanuel@southernco.com'; 'tjmuccull@southernco.com'; 'gdwaters@southernco.com'; 'gnterry@southernco.com'; 'Forney.Kathleen@epamail.epa.gov'; Bradburn, Rick
Cc: Branum, Corrie; Adams, Patty
Subject: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant
Sent: 10/15/2007 3:23 PM

was read on 10/15/2007 3:24 PM.

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From: Branum, Corrie
To: Friday, Barbara
Sent: Monday, October 15, 2007 3:24 PM
Subject: Read: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant

Your message

To: 'pmmanuel@southernco.com'; 'tjmuccull@southernco.com'; 'gdwaters@southernco.com'; 'gnterry@southernco.com'; 'Forney.Kathleen@epamail.epa.gov'; Bradburn, Rick
Cc: Branum, Corrie; Adams, Patty
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was read on 10/15/2007 3:24 PM.

Friday, Barbara

From: Waters, G. Dwain [GDWATERS@southernco.com]
To: Friday, Barbara
Sent: Monday, October 15, 2007 3:27 PM
Subject: Read: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant

Your message

To: GDWATERS@southernco.com
Subject:

was read on 10/15/2007 3:27 PM.

Friday, Barbara

From: Waters, G. Dwain [GDWATERS@southernco.com]
Sent: Monday, October 15, 2007 3:27 PM
To: Friday, Barbara; Manuel, Penny Morris; tjmuccull@southernco.com; Terry, Greg N.;
Forney.Kathleen@epamail.epa.gov; Bradburn, Rick; Jones, Laneisa L.
Cc: Branum, Corrie; Adams, Patty
Subject: Re: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-
AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant

Gulf has received the Crist Air Construction Permit. Thanks, Dwain

Dwain Waters, QEP

-----Original Message-----

From: Friday, Barbara <Barbara.Friday@dep.state.fl.us>
To: Manuel, Penny Morris; tjmuccull@southernco.com <tjmuccull@southernco.com>; Waters, G. Dwain; Terry, Greg N.; Forney.Kathleen@epamail.epa.gov <Forney.Kathleen@epamail.epa.gov>; Bradburn, Rick <Rick.Bradburn@dep.state.fl.us>
CC: Branum, Corrie <Corrie.Branum@dep.state.fl.us>; Adams, Patty <Patty.Adams@dep.state.fl.us>
Sent: Mon Oct 15 14:22:57 2007
Subject: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
<http://www.adobe.com/products/acrobat/readstep.html>
<blocked::blocked::blocked::blocked::blocked::blocked::blocked::blocked::blocked::blocked::http://www.adobe.com/products/acrobat/readstep.html> .

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Thank you,

DEP, Bureau of Air Regulation

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Friday, Barbara

From: Terry, Greg N. [GNTERRY@southernco.com]
To: undisclosed-recipients
Sent: Monday, October 15, 2007 3:38 PM
Subject: Read: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant

Your message

To: GNTERRY@southernco.com
Subject:

was read on 10/15/2007 3:38 PM.

Friday, Barbara

From: Manuel, Penny Morris [PManuel@southernco.com]
To: Friday, Barbara
Sent: Monday, October 15, 2007 5:01 PM
Subject: Read: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant

Your message

To: PManuel@southernco.com
Subject:

was read on 10/15/2007 5:01 PM.

Friday, Barbara

From: Forney.Kathleen@epamail.epa.gov
Sent: Tuesday, October 16, 2007 11:11 AM
To: Friday, Barbara
Subject: Re: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant

got it... thanks

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

"Friday,
Barbara"
<Barbara.Friday@
dep.state.fl.us>

10/15/2007 03:22
PM

To
<pmmanuel@southernco.com>,
<tjmuccull@southernco.com>,
<gdwaters@southernco.com>,
<gnterry@southernco.com>,
Kathleen Forney/R4/USEPA/US@EPA,
"Bradburn, Rick"
<Rick.Bradburn@dep.state.fl.us>

cc

"Branum, Corrie"
<Corrie.Branum@dep.state.fl.us>,
"Adams, Patty"
<Patty.Adams@dep.state.fl.us>

Subject

DRAFT Air Construction Permit
Revision/Title V Permit Revision
No.:
0330045-019-AC/0330045-020-AV -
Gulf Power Company - Crist
Electric Generating Plant

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,
DEP, Bureau of Air Regulation

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey. [attachment "0330045-020-AV Statement of Basis.pdf" deleted by Kathleen Forney/R4/USEPA/US] [attachment "0330045-014-AC Final Appendix GC.pdf" deleted by Kathleen Forney/R4/USEPA/US] [attachment "0330045-019&020CombinedNoticeofIntent.pdf" deleted by Kathleen Forney/R4/USEPA/US] [attachment "0330045-019-AC Draft Permit.pdf" deleted by Kathleen Forney/R4/USEPA/US] [attachment "0330045-019-AC TEPD.pdf" deleted by Kathleen Forney/R4/USEPA/US] [attachment "0330045-020-AV 1 Page TV Revision.pdf" deleted by Kathleen Forney/R4/USEPA/US]

Friday, Barbara

From: System Administrator
To: tjmuccull@southernco.com
Sent: Monday, October 15, 2007 3:23 PM
Subject: Undeliverable:DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant

Your message did not reach some or all of the intended recipients.

Subject: DRAFT Air Construction Permit Revision/Title V Permit Revision No.: 0330045-019-AC/0330045-020-AV - Gulf Power Company - Crist Electric Generating Plant
Sent: 10/15/2007 3:23 PM

The following recipient(s) could not be reached:

tjmuccull@southernco.com on 10/15/2007 3:23 PM

There was a SMTP communication problem with the recipient's email server. Please contact your system administrator.
<tlhexsprot2.floridadep.net #5.5.0 smtp;550 Mailbox unavailable or access denied - <tjmuccull@southernco.com>>