



Florida Department of Environmental Protection

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

December 07, 2010

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Mimi A. Drew
Secretary

Sent by Electronic Mail – Received Receipt Requested

James Vick, Environmental Affairs Director
Gulf Power Company
One Energy Place
Pensacola, FL 32520

Re: Draft Air Permit No. 0330045-032-AC
Crist Electric Generating Plant
Crist Unit 6 ESP Project

Dear Mr. Vick:

On October 20, 2010, you submitted an application to upgrade the electrostatic precipitator (ESP) on the existing Unit 6 at the Crist Electric Generating Plant. The proposed project consists of the addition of two rows of collecting electrodes, replacement of high voltage discharge electrodes, upgrades of the power supply and computer control system, and the external strengthening of the shell. The project is not subject to prevention of significant deterioration preconstruction review because it will not increase emissions nor change the capacity. This work will be conducted at the existing Crist Electric Generating Plant, which is located in Escambia County at 11999 Pate Street in Pensacola, Florida. Enclosed are the following documents: Written Notice of Intent to Issue Air Permit; Public Notice of Intent to Issue Air Permit; Technical Evaluation and Preliminary Determination; and Draft Permit with Appendices.

The Public Notice of Intent to Issue Air Permit 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, Heidi Coggins, at 850/921-9528.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

TLV/jfk/hmc

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 32520-0329

Draft Permit No. 0330045-032-AC

Authorized Representative:

James Vick, Environmental Affairs Director

Crist Electric Generating Plant
Crist Unit 6 ESP
Escambia County, Florida

Facility Location: Gulf Power Company operates the existing Crist Electric Generating Plant, which is located in Escambia County at 11999 Pate Street in Pensacola, Florida.

Project: The applicant proposes to reconstruct the electrostatic precipitator (ESP) for Unit 6 at the existing Crist Electric Generating Plant. The project consists of the addition of two rows of collecting electrodes, replacement of high voltage discharge electrodes, upgrades of the power supply and computer control systems, and the external strengthening of the shell. The proposed project is not subject to preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.).

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.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone 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 Permit, the Technical Evaluation and Preliminary Determination, the application, and the 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 or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit 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 above address or phone number. 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 7 days of publication. Failure to

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the 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 decision 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. 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 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.

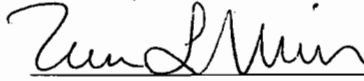
A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; 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. If there are none, the petition must so state; (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 Permit. 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.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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 Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 12/8/10 to the persons listed below.

- Mr. James Vick, Gulf Power Company (jovick@southernco.com)
- Mr. G. Dwain Waters, Gulf Power Company (gdwaters@southernco.com)
- Mr. Gregory Terry, Gulf Power Company (gnterry@southernco.com)
- Mr. Rick Bradburn, DEP-NWD Office (rick.bradburn@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@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)

12/8/10
(Date)

P.E. CERTIFICATION STATEMENT

PERMITTEE

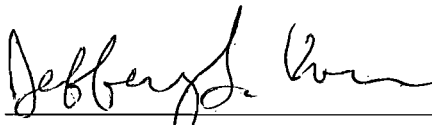
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0329

Draft Permit No. 0330045-032-AC
Crist Electric Generating Plant
Crist Unit 6 ESP Project
Escambia County, Florida

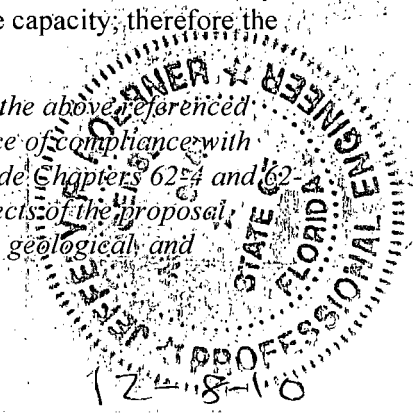
PROJECT DESCRIPTION

The applicant requested authorization to upgrade the electrostatic precipitator for Unit 6. The proposed project includes the addition of two rows of collecting electrodes, replacement of high voltage discharge electrodes, upgrades of the power supply and computer control system, and external strengthening of the shell. The refurbishing company is Hamon Research-Cottrell. The new ESP design is required to maintain the efficiency rating of 99.6 percent. The proposed project will not increase emissions nor change the capacity, therefore the project is not subject to PSD preconstruction review.

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 any other aspects of the proposal, (including, but not limited to, the electrical, civil, mechanical, structural, hydrological, geological and meteorological features).



Jeff Koerner, P.E.
Registration Number: 49441



(Date)

DRAFT PERMIT

PERMITTEE

Gulf Power Company
One Energy Place
Pensacola, FL 32520-0329

Authorized Representative:
James Vick, Environmental Affairs Director

Air Permit No. 0330045-032-AC
Expires: April 01, 2013

Crist Electric Generating Plant
Facility ID No. 0330045
Crist Unit 6 ESP Project

PROJECT

This is the final air construction permit that authorizes reconstruction of the electrostatic precipitator (ESP) for Unit 6 at the existing Crist Electric Generating Plant, which is categorized under Standard Industrial Classification No. 4911. The existing facility is located in Escambia County at 11999 Pate Street in Pensacola, Florida. The UTM coordinates are Zone 16; 478.5 km East; 3381.44 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

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 conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

(DRAFT)

Joseph Kahn, Director
Division of Air Resource Management

(Date)

DRAFT PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on _____ (DRAFT) _____ to the persons listed below.

- Mr. James Vick, Gulf Power Company (jovick@southernco.com)
- Mr. G. Dwain Waters, Gulf Power Company (gdwaters@southernco.com)
- Mr. Gregory Terry, Gulf Power Company (gnterry@southernco.com)
- Mr. Rick Bradburn, DEP-NWD Office (rick.bradburn@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@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.

(DRAFT)

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY DESCRIPTION

This existing facility consists of four active fossil fuel fired steam generators (boilers). Boilers 4 and 5 were Acid Rain Phase I substitution Units. Boilers 6 and 7 were Acid Rain Phase I Units. All four boilers are subject to the Acid Rain Phase II and Clean Air Interstate Rule (CAIR) requirements. Pulverized coal is the primary fuel for Boilers 4, 5, 6 and 7. Natural gas, fuel oil and on-specification used oil are used as supplemental fuels in all four of the boilers.

Facility ID No. 0330045	
ID No.	Emission Unit Description
004	Boiler 4 – 1,096.7 MMBtu/hour (Acid Rain Phase I substitution & CAIR Unit)
005	Boiler 5 – 1,096.7 MMBtu/hour (Acid Rain Phase I substitution & CAIR Unit)
006	Boiler 6 – 3,704.8 MMBtu/hour (Acid Rain Phase I & CAIR Unit)
007	Boiler 7 – 6,406.4 MMBtu/hour (Acid Rain Phase I & CAIR Unit)

PROPOSED PROJECT

The project authorizes the facility to reconstruct the ESP for existing Unit 6 at the Crist Electric Generating Plant. The project includes the addition of two rows of collecting electrodes, replacement of high voltage discharge electrodes, upgrades of the power supply and computer control systems, and external strengthening of the shell. The proposed project will not increase emissions nor change the capacity.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. The project is not subject to PSD preconstruction review.
- The facility is subject to applicable New Source Performance Standards (NSPS) in Title 40, Part 60 of the Code of Federal Regulations.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The Permitting Authority for this project is the Bureau of Air Regulation in the Division of Air Resource Management of the Department. The mailing address for the Bureau of Air Regulation is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate an emissions unit shall be submitted to the Compliance Authority.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northwest District Office at 160 Governmental Center, Suite 308, Pensacola, Florida 32501-5794.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); Appendix D (Common Testing Requirements).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units 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 Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. 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.]
6. Modifications: No emissions unit 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) and 62-212.300(1) (a), F.A.C.]
7. Source Obligation:
 - (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.[Rule 62-212.400(12), F.A.C.]
8. Title V Permit: This permit authorizes specific modifications and/or new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to each Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU 006 – Boiler No. 6

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
006	Unit 6 is a front wall fired, dry bottom boiler manufactured by Foster Wheeler. The primary fuels are coal and natural gas with No. 2 fuel oil as a secondary fuel. It is rated at a maximum heat input rate of 3,704.8 MMBtu/hour when firing pulverized coal or natural gas, and 714.8 MMBtu/hr when firing No. 2 fuel oil or on-specification used oil. It operates a wet flue gas desulfurization (FGD) system to control SO ₂ emissions from Units 4 – 7 sharing a common stack under normal conditions with the wet FGD system in operation. There is a common stack for Units 6 and 7 to bypass FGD for periods of startup and shutdown, malfunction of the Units or the wet FGD system, repair, scheduled, or maintenance of the wet FGD system. The common stack height is 490 feet with a diameter of 35 feet, and the actual volumetric flow rate is 3,282,000 actual cubic feet per minute. The common bypass stack is 450 feet tall with a diameter of 23.2 feet. Particulate matter is controlled by a cold side electrostatic precipitator. A selective non-catalytic reduction system is used to control nitrogen oxides.

EQUIPMENT

1. Electrostatic Precipitator: The permittee is authorized to conduct, but not limited to, the following work to rebuild the existing ESP on Unit 6.
 - Upgrade and replace collecting electrodes as necessary;
 - Upgrade rappers;
 - Install and provide of new anti-sneak baffles;
 - Improve, replace and install discharge electrodes;
 - Upgrade hot roofs and cold roof floors;
 - Upgrade access doors as necessary;
 - Supply new electrical and power system as necessary;
 - Upgrade the existing computer;
 - Supply and install of key interlock systems for access doors;
 - Supply and install penthouse heating and ventilation systems (purge air system fans and controls);
 - Improve the internal water wash system;
 - Replacement of all ash hoppers;
 - Reinforcement of the internal and external walls of each precipitator box; and
 - Upgrade and replacement of insulation.

{Permitting Note: Based upon the application, the new ESP will consist of two compartments and 20 separate electrical fields. The revised collection plate area will be 508,816 ft². The gas velocity through the precipitator will be 3.84 feet/second. The precipitator system on Crist Unit 6 consists of two casings and is designed for a total gas flow of 1,325,820 acfm at 340° F. The precipitator is powered by 20 transformer rectifier (T-R) sets (10 T-R sets per casing) and consisting of five mechanical fields in the direction of gas flow. Each is 11.8 feet in length for a total of 59 feet of treatment in the direction of gas flow. Each casing has 2 non-gas tight cells. Each casing has 44 gas passages or 22 per cell. The existing total collecting plate height is 49 feet with an effective height of 47 feet. The configuration is a 16 inch-spaced rigid discharge electrode design. The collection plate gauge is 16. The new configuration will also be configured as a 16 inch-spaced rigid discharge electrode design. There will be no change to plant operations for soot blowing for Unit 6. The proposed ESP will be designed to maintain a particulate matter removal efficiency of 99.6%}

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU 006 – Boiler No. 6

[Design and Application No. 0330045-032-AC]

EMISSIONS STANDARDS

2. Opacity Standards: After completing construction of the rebuilt ESP and satisfactorily conducting the initial particulate matter test, the stack opacity shall not exceed 20% based on a six-minute average except for one six-minute average per hour of not more than 27% opacity during normal operation. [Rule 62-4.070(3), F.A.C.]

{Permitting Note: Unit 6 remains subject to all particulate emissions standards previously, specified in valid air construction and air operation permits.}

TESTING REQUIREMENTS

3. Initial Compliance Tests: In accordance with EPA Methods 5 or 17, Unit 6 shall be tested to demonstrate initial compliance with the emissions standards for particulate matter. The initial tests shall be conducted within 60 days after returning Unit 6 to service with the rebuilt ESP and achieving permitted capacity, but not later than 180 days after the return to service. Subsequent compliance tests shall be conducted in accordance with the conditions of the Title V permit. [Rules 62-4.070(3) and 62-297.310(7) (a) 1, F.A.C.]
4. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7) (a) 4, F.A.C.]
5. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
5	Method for Determining Particulate Matter Emissions
9	Visual Determination of the Opacity of Emissions from Stationary Sources
17	Determination of Particulate Emission from Stationary Source (In Stack Filtration Method)

{Permitting Note: A transmissometer used to demonstrate compliance should record sufficient data so as to be equivalent to a Method 9 test. Method 9 requires determining an average based on 24 readings at 15-second intervals, thus, a six-minute average. The transmissometers in use at this facility make a permanent recording every six minutes based on an average of readings taken every 15 seconds. After the six-minute average is recorded, the individual readings are erased and a new 6-minute average is determined based on the next set of twenty four individual readings. This six-minute block recording is consistent with the requirements of Method 9.}

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-297.401, F.A.C. and Permit No. 0330045-005-AC]

6. ESP Parameters: The ESP parameters shall be monitored and recorded at the beginning and end of each required PM test. [Rule 62-4.070(3), F.A.C.]

MONITORING REQUIREMENTS

7. CAM Plan: Unit 6 is subject to the Compliance Assurance Monitoring (CAM) requirements. Emissions monitoring and analysis procedures or test methods specified by applicable requirements including 40 CFR

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU 006 – Boiler No. 6

64, Compliance Assurance Monitoring, adopted and incorporated by reference at subsection 62-204.800, F.A.C. The permittee shall update the current CAM plan as necessary when the Title V is revised.

8. COMS: The permittee shall continue to operate and maintain the existing continuous opacity monitoring system (COMS) to demonstrate compliance with the stack opacity standard for Unit 6.

RECORDS AND REPORTS

9. Stack Test Reports: The permittee shall prepare and submit reports for all required stack tests in accordance with the requirements specified in Rule 62-297.310(8), F.A.C. All stack test data collected during the field-testing program shall be submitted for review. For each test run, the report shall also indicate the information required by this permit. For each required stack test, the permittee shall submit a written report that summarizes the results with 45 days of completing such test. [Rule 62-297.310(8), F.A.C.]
10. Final Report: Within 90 days of completing construction, the permittee shall submit a report summarizing the as-built project and critical ESP parameters (field voltages, rapping intensity, and rapping frequency). [Rule 52-4.070(3), F.A.C]

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Construction Permit
Project No. 0330045-032-AC
Gulf Power Company, Crist Electric Generating Plant
Escambia County, Florida

Applicant: The applicant for this project is Gulf Power Company. The applicant's authorized representative and mailing address is: James Vick, Environmental Affairs Director, Gulf Power Company, Crist Electric Generating Plant, One Energy Place, Pensacola, FL 32520.

Facility Location: Gulf Power Company operates the existing Crist Electric Generating Plant which is located in Escambia County at 11999 Pate Street in Pensacola, Florida.

Project: The applicant proposes to reconstruct the electrostatic precipitator (ESP) for Unit 6 at the existing Crist Electric Generating Plant. The project consists of the addition of two rows of collecting electrodes, replacement of high voltage discharge electrodes, upgrades of the power supply and computer control systems, and the external strengthening of the shell. The proposed project will not cause any increases in emissions nor change the capacity. The project is not subject to preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.).

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.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone 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 the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site by entering draft permit number:
<http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit 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: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

(Public Notice to be Published in the Newspaper)

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, 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 at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). 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 this Public Notice or receipt of a written notice, 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 rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, 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 Public Notice of Intent to Issue Air Permit. 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 for this proceeding.

SECTION 4. APPENDICES

Contents

- Appendix A. Citation Formats and Glossary of Common Terms
- Appendix B. General Conditions
- Appendix C. Common Conditions
- Appendix D. Common Testing Requirements

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit

"AO" identifies the permit as an Air Operation Permit

"123456" identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located

"2222" represents the specific facility ID number for that county

"001" identifies the specific permit project number

"AC" identifies the permit as an air construction permit

"AF" identifies the permit as a minor source federally enforceable state operation permit

"AO" identifies the permit as a minor source air operation permit

"AV" identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality

"FL" means that the permit was issued by the State of Florida

"317" identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

µg: microgram

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System
(Department's database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

CAA: Clean Air Act	NESHAP: National Emissions Standards for Hazardous Air Pollutants
CMS: continuous monitoring system	NO_x: nitrogen oxides
CO: carbon monoxide	NSPS: New Source Performance Standards
CO₂: carbon dioxide	O&M: operation and maintenance
COMS: continuous opacity monitoring system	O₂: oxygen
DARM: Division of Air Resource Management	Pb: lead
DEP: Department of Environmental Protection	PM: particulate matter
Department: Department of Environmental Protection	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
dscf: dry standard cubic feet	ppm: parts per million
dscfm: dry standard cubic feet per minute	ppmv: parts per million by volume
EPA: Environmental Protection Agency	ppmvd: parts per million by volume, dry basis
ESP: electrostatic precipitator (control system for reducing particulate matter)	QA: quality assurance
EU: emissions unit	QC: quality control
F: fluoride	PSD: prevention of significant deterioration
F.A.C.: Florida Administrative Code	psi: pounds per square inch
F.A.W.: Florida Administrative Weekly	PTE: potential to emit
F.D.: forced draft	RACT: reasonably available control technology
F.S.: Florida Statutes	RATA: relative accuracy test audit
FGD: flue gas desulfurization	RBLC: EPA's RACT/BACT/LAER Clearinghouse
FGR: flue gas recirculation	SAM: sulfuric acid mist
ft²: square feet	scf: standard cubic feet
ft³: cubic feet	scfm: standard cubic feet per minute
gpm: gallons per minute	SIC: standard industrial classification code
gr: grains	SIP: State Implementation Plan
HAP: hazardous air pollutant	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
Hg: mercury	SO₂: sulfur dioxide
I.D.: induced draft	TPD: tons/day
ID: identification	TPH: tons per hour
kPa: kilopascals	TPY: tons per year
lb: pound	TRS: total reduced sulfur
MACT: maximum achievable technology	UTM: Universal Transverse Mercator coordinate system
MMBtu: million British thermal units	VE: visible emissions
MSDS: material safety data sheets	VOC: volatile organic compounds
MW: megawatt	

SECTION 4. APPENDIX B

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 403.141, 403.727, or 403.859 through 403.861, F.S. 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 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any 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 of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and 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 and 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 reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under 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 noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time then noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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 Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

SECTION 4. APPENDIX B

General Conditions

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. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rules 624.120 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 to project);
 - b. Determination of Prevention of Significant Deterioration (not applicable to project); and
 - c. Compliance with New Source Performance Standards (not applicable to project).
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 for 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:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) 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.

SECTION 4. APPENDIX C

Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 624.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
4. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
5. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4) (c), F.A.C.]

RECORDS AND REPORTS

6. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1) (b) 2, F.A.C.]

SECTION 4. APPENDIX D
Common Testing Requirements

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units that require testing.

COMPLIANCE TESTING REQUIREMENTS

1. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
2. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. [Rule 62-297.310(2), F.A.C.]
3. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
4. Applicable Test Procedures:
 - a. Required Sampling Time.
 - (1) Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
 - (2) Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - (a) For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
 - (b) The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
 - (c) The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
 - b. Minimum Sample Volume. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.

SECTION 4. APPENDIX D
Common Testing Requirements

- c. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.
- d. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.
- e. Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

TABLE 297.310-1 CALIBRATION SCHEDULE			
ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calibration liquid in glass	5° F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5° F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/- 0.001" mean of at least three readings; Max. deviation between readings, 0.004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, when 5% change observed, annually	Spirometer or calibrated wet test or dry gas test meter	2%
	2. One Point: Semiannually		
	3. Check after each test series	Comparison check	5%

[Rule 62-297.310(4), F.A.C.]

5. Determination of Process Variables:

- a. *Required Equipment.* 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.
- b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be 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), F.A.C.]

SECTION 4. APPENDIX D
Common Testing Requirements

REPORTS

6. Test Reports:

- a. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- b. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- c. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information.
 - (1) The type, location, and designation of the emissions unit tested.
 - (2) The facility at which the emissions unit is located.
 - (3) The owner or operator of the emissions unit.
 - (4) The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 - (5) The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 - (6) The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 - (7) A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 - (8) The date, starting time and duration of each sampling run.
 - (9) The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
 - (10) The number of points sampled and configuration and location of the sampling plane.
 - (11) For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
 - (12) The type, manufacturer and configuration of the sampling equipment used.
 - (13) Data related to the required calibration of the test equipment.
 - (14) Data on the identification, processing and weights of all filters used.
 - (15) Data on the types and amounts of any chemical solutions used.
 - (16) Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
 - (17) The names of individuals, who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
 - (18) All measured and calculated data required to be determined by each applicable test procedure for each run.
 - (19) The detailed calculations for one run that relate the collected data to the calculated emission rate.
 - (20) The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
 - (21) A certification that, to the knowledge of the owner or his authorized agent, all data submitted is true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify

SECTION 4. APPENDIX D
Common Testing Requirements

that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

MISCELLANEOUS

7. Stack and Duct: The terms stack and duct are used interchangeably in this rule. [Rule 62-297.310(9), F.A.C.]



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Gulf Power Company
One Energy Place
Pensacola, FL 32520-0329
Crist Electric Generating Plant
ARMS Facility ID No. 0330045

PROJECT

Project No. 0330045-032-AC
Crist Unit 6 ESP Project

COUNTY

Escambia County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
New Source Review Section
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

December 07, 2010

1. GENERAL PROJECT INFORMATION

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 (F.A.C.). 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, 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 Best Available Control Technology (BACT), and Non-attainment Area Review and Lowest Achievable Emission Rate (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). Prevention of Significant Deterioration applicability and the preconstruction review requirements of Rule 62-212.400, F.A.C. are discussed in Section 2 of this report. Additional details of the other state regulations are provided in Section 3 of this report.

Federal Regulations

The Environmental Protection Agency (EPA) 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. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Facility Description and Location

The Gulf Power Company operates the existing Crist Electric Generating Plant, an electric services facility, which is categorized under Standard Classification Code of SIC No. 4911. The existing facility is located in Escambia County at 11999 Pate Street in Pensacola, Florida. The UTM coordinates are Zone 16; 478.5 km East; 3381.44 km North. This existing site is in an area that is in attainment or designated as unclassifiable or maintenance for all air pollutants subject to a state and federal Ambient Air Quality Standard (AAQS).

Unit 6 is a front wall fired, dry bottom boiler manufactured by Foster Wheeler. The primary fuels are coal and natural gas with No. 2 fuel oil as a secondary fuel. It is rated at a maximum heat input rate of 3,704.8 MMBtu/hour when firing pulverized coal or natural gas, and 714.8 MMBtu/hr when firing No. 2 fuel oil or on-specification used oil. It operates a wet flue gas desulfurization (FGD) system to control SO₂ emissions from Units 4 – 7 sharing a common stack under normal conditions with the wet FGD system in operation. There is a common stack for Units 6 and 7 to bypass FGD for periods of startup and shutdown, malfunction of the Units or the wet FGD system, repair, scheduled, or maintenance of the wet FGD system. The common stack height is 490 feet with a diameter of 35 feet, and the actual volumetric flow rate is 3,282,000 actual cubic feet per minute. The common bypass stack is 450 feet tall with a diameter of 23.2 feet. Particulate matter is controlled by a cold side electrostatic precipitator. A selective non-catalytic reduction system is used to control nitrogen oxides.

Primary Regulatory Categories

- The existing facility is a major source of hazardous air pollutants (HAP).
- The existing facility operates units subject to the acid rain provisions of the Clean Air Act.
- The existing facility is a Title V major source of air pollution in accordance with Chapter 213, 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. The project is not subject to PSD preconstruction review.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

- The facility is subject to applicable New Source Performance Standards (NSPS) in Title 40, Part 60 of the Code of Federal Regulations.

Project Description

On October 20, 2010, the Department received an application requesting authorization to upgrade the electrostatic precipitator (ESP) for Unit 6 at the existing Crist Electric Generating Plant. The proposed ESP consists of the following detailed upgrades:

- Upgrade and replace collecting electrodes as necessary;
- Upgrade rappers;
- Install and provide of new anti-sneak baffles;
- Improve, replace and install discharge electrodes;
- Upgrade hot roofs and cold roof floors;
- Upgrade access doors as necessary;
- Supply new electrical and power system as necessary;
- Upgrade the existing computer;
- Supply and install of key interlock systems for access doors;
- Supply and install penthouse heating and ventilation systems (purge air system fans and controls);
- Improve the internal water wash system;
- Replacement of all ash hoppers;
- Reinforcement of the internal and external walls of each precipitator box; and
- Upgrade and replacement of insulation.

The ESP strengthening is required to accommodate the additional 10 inch pressure drop that the selective catalytic reduction places on the gas path. The new upgrade design is required to maintain the efficiency rating of 99.6 percent. Gulf Power Company will replace the existing ESP to comply with the current opacity, particulate and compliance assurance monitoring (CAM) requirements.

2. 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. PSD pollutants include: carbon monoxide (CO); nitrogen oxides (NO_x); sulfur dioxide (SO₂); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM₁₀); volatile organic compounds (VOC); lead (Pb); Fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H₂S); total reduced sulfur (TRS), including H₂S; reduced sulfur compounds, including H₂S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO₂ and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as nonmethane organic compounds (NMOC); and mercury (Hg).

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 the project exceeding

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

these rates are considered "significant" and the 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. Rule 62-210.200, F.A.C. defines "BACT" as:

An emission limitation, including a visible emissions standard, based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account:

- 1. Energy, environmental and economic impacts, and other costs;*
- 2. All scientific, engineering, and technical material and other information available to the Department; and*
- 3. The emission limiting standards or BACT determinations of Florida and any other state;*

Determines is achievable through application of production processes and available methods, systems and techniques (including fuel cleaning or treatment or innovative fuel combustion techniques) for control of each such pollutant.

If the Department determines that technological or economic limitations on the application of measurement methodology to a particular part of an emissions unit or facility would make the imposition of an emission standard infeasible, a design, equipment, work practice, operational standard or combination thereof, may be prescribed instead to satisfy the requirement for the application of BACT. Such standard shall, to the degree possible, set forth the emissions reductions achievable by implementation of such design, equipment, work practice or operation.

Each BACT determination shall include applicable test methods or shall provide for determining compliance with the standard(s) by means which achieve equivalent results.

In no event shall application of best available control technology result in emissions of any pollutant which would exceed the emissions allowed by any applicable standard under 40 CFR Parts 60, 61, and 63.

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 and otherwise designated as unclassifiable. The proposed project consists of rebuilding the existing electrostatic precipitator. This project will not increase emissions nor change the capacity. The project is not subject to PSD preconstruction review.

3. DEPARTMENT'S PROJECT REVIEW

Gulf Power Company is constructing a new SCR system for Unit 6 under construction permit No. 0330045-028-AC, which will be incorporated into the facility's Title V permit under 0330045-031-AV. The SCR project is scheduled for completion by 2012. The applicant proposes to rebuild the existing ESP for Unit 6 by 2012 as described below.

Electrostatic Precipitator Operation

Particles suspended in a gas enter the precipitator and pass through ionized zones around high voltage discharge electrodes. The electrodes, through a corona effect, emit negatively charged ions into the gas and to the grounded collecting plates. The ionized field around the discharge electrodes charges the particulate causing it to migrate to the positively charged surface of the collecting electrode. The charged particles agglomerate on the grounded collecting plates and their charge bleeds off. Rappers dislodge the agglomerated particulate, which falls into the collection hoppers for removal. ⁽¹⁾

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

According to reference website⁽²⁾, designing a precipitator for optimum performance requires proper sizing of the precipitator in addition to optimizing precipitator efficiency. Precipitator performance depends on its size and collecting efficiency. Important parameters include the collecting area and the gas volume to be treated. Uniformity of gas velocity is also desirable. Good gas velocity distribution through a precipitator meets these requirements:

- 85% of all measured gas velocities < 1.15 times the average gas velocity
- 99% of all measured gas velocities < 1.40 times the average.

Proposed Electrostatic Precipitator

Currently, the control technology used to collect the majority of this PM/PM₁₀ is a cold side ESP for Unit 6. NO_x emissions are controlled by low-NO_x burners and a selective non-catalytic reduction (SNCR) system.

Based upon the application, the new ESP will consist of two compartments and 20 separate electrical fields. The revised collection plate area will be 508,816 ft². The gas velocity through the precipitator will be 3.84 feet/second. The precipitator system on Crist Unit 6 consists of two casings and is designed for a total gas flow of 1,325,820 acfm at 340° F. The precipitator is powered by 20 transformer rectifier (T-R) sets (10 T-R sets per casing) and consisting of five mechanical fields in the direction of gas flow. Each is 11.8 feet in length for a total of 59 feet of treatment in the direction of gas flow. Each casing has 2 non-gas tight cells. Each casing has 44 gas passages or 22 per cell. The existing total collecting plate height is 49 feet with an effective height of 47 feet. The configuration is a 16 inch-spaced rigid discharge electrode design. The collection plate gauge is 16.

The Unit 6 ESP consists of a wide-spaced configuration with rigid frames, internally bottom rapped electrodes. The new configuration will also be configured as a 16 inch-spaced rigid discharge electrode design. The two proposed cleaning methods are plate rapping and plate vibrating. There will be no change to plant operations for soot blowing for Unit 6. There are no current plans to use a conditioning agent to improve dust resistivity. The proposed ESP will be designed to achieve a particulate emission rate of 0.1 lb/MMBtu and the stack opacity of 10%.

The proposed refurbishment company is Hamon/Research-Cottrell.

Design Specifications

Some specifications that should be considered for the design of an ESP are the following:

Collection efficiency is the primary consideration of ESP design. The proposed ESP is designed for a collection efficiency of 99.65%. Uncontrolled emission factor for PM from bituminous coal combustion is 5.83 lb/MMBtu.⁽³⁾

Emission Factor = (1-99.6% efficiency) (5.83 lb/MMBtu) = 0.023 lb/MMBtu.

For the project, the given value is 0.023lb/MMBtu and meets the limits of particulate emissions of 0.1 lb/MMBtu.

Electrical sectionalization (ES) is important to achieve high collection efficiency in the ESP. Electrical sectionalization refers to the division of a precipitator into a number of different fields and cells, each powered by its own Transformer-Rectifier (T-R) set. There should be approximately one T-R set for every 10,000 to 30,000 ft² of collection plate area.⁽⁴⁾

$$ES = \frac{\text{Total Ac. (ft}^2\text{)}}{\text{T-R sets}}$$

T-R sets

$$ES = \frac{(508,816 \text{ ft}^2)}{(20 \text{ T-R set})}$$

(20 T-R set)

$$ES = 25,440.8 \text{ ft}^2/\text{T-R set}$$

Specific collection area (SCA) is defined as the ratio of collection surface area to the gas flow rate into the collector. The preliminary design has a specific collection area of 384.0 ft² per 1000 ft³/min. Most conservative designs call for an SCA of 350 to 400 ft² per 1000 acfm to achieve collection efficiency of more than 99.5%.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The general range of SCA is between 200 and 800 ft² per 1000 acfm, depending on precipitator design conditions and desired collection efficiency. The preliminary specific collection area meets the criteria for a conservative design. ⁽⁴⁾

$$\text{SCA} = \frac{\text{Total collection plate area, (ft}^2\text{)}}{\text{Flow rate, (ft}^3\text{/min)}}$$
$$\text{SCA} = (508,816 \text{ ft}^2) / (1,325,820 \text{ ft}^3\text{/min})$$

$$\text{SCA} = 384 \text{ ft}^2 \text{ per } 1000 \text{ ft}^3\text{/min} \sim 0.384 \text{ min/ft}$$

Aspect ratio is the ratio of the effective length of the collector surface to the effective height. The aspect ratio should be high enough to allow the rapped particles to settle in the hopper before they are carried out of the ESP by the gas flow. The aspect ratio is usually greater than 1.0 for high-efficiency ESPs. The common aspect ratio varies from 1.3 to 1.5, and they are as high 2.0. ⁽⁴⁾ For the project, the given value is 1.22 which meets the criteria.

Particle migration velocity is the speed at which a particle, once charged, migrates toward the grounded collection electrode. Variables affecting particle velocity are particle size, the strength of the electric field, and the viscosity of the gas. The migration-velocity parameter represents the collectability of the particle within the confines of a specific ESP. ⁽⁴⁾

$$n = 1 - e^{-w(A/Q)}$$

$$w = - \frac{Q}{Ac} * [\ln(1-n)]$$

$$w = - \frac{(1,325,820 \text{ ft}^3\text{/min}) * [\ln(1-0.9965)]}{(508,816 \text{ ft}^2)}$$

$$w = 14.735 \text{ ft/min} \sim 0.245 \text{ ft/sec}$$

The desired range is between 0.1 to 0.5 ft/sec and the given value is optimal.

Gas flow distribution is critical to ensure collection of the particles. To assure even distribution, gas should enter the ESP through an expansion inlet plenum containing perforated diffuser plates. The gas velocity through the body of the ESP should be approximately 4 to 8 ft/sec. The outlet of the ESP should also be carefully designed to provide even flow of the gas from the ESP to the stack without excessive pressure buildup. ⁽⁴⁾

Collection electrodes (plates) are grounded components on which the dust collects. The Plant Crist Unit 6 precipitator consists of a wide-spaced configuration with rigid frames, internally bottom rapped electrodes. The new configuration shall also be configured as a 16 inch-spaced rigid discharge electrode design. There will be no change to plant operations for soot blowing for Unit 6. The existing total collecting plate height is 49 ft with an effective height of 47 ft. ⁽⁵⁾

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The range of basic design parameters for fly ash precipitators are given by the following table:

Typical Ranges of design parameters for fly ash precipitators		
Parameter	Range (English units)	Project
Gas velocity in ESP	4-8 ft/sec (5-6 ft/sec optimum)	3.84 ft/sec
SCA	200-800 ft ² /1000 cfm (300-400 ft ² /1000 cfm optimum)	384 ft ² /1000 cfm
Aspect Ratio (L/H)	1-1.5	1.22
Particle migration velocity	0.1-0.5 ft/sec	0.245 ft/sec
Plate area per electrical (T-R set)	5000-80,000 ft ² /T-R set (10,000-30,000 ft ² /T-R set)	25440.8 ft ² /T-R set

Conclusion:

The proposed ESP rebuild design conforms to the typical design specifications for fly ash precipitators. The refurbishing company is Hamon Research-Cottrell which is a major provider of air pollution control technology solutions for utilities, refineries and other industries.

Particulate matter emissions continue to be regulated by Rules 62-296.405(1) (b), 62-296.405(1) (f) and 62-210.700(3), F.A.C. in accordance with the current Title V Permit. The current particulate matter standard is 0.1 lb/MMBtu for normal operation and 0.30 lb/MMBtu for soot blowing.

Based on the rebuild design, the controlled particulate matter emission rate will be much less than the current permit limit for normal operation. The design specification is for stack opacity of 10% or less. Therefore, the draft permit includes the following new limit on stack opacity: "The stack opacity shall not exceed 20% based on a six-minute average, except for one six-minute average per hour of not more than 27% opacity. [Rule 62-4.070(3)]"

4. 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. Heidi Coggins, Engineer Specialist I, is the project engineer responsible for reviewing the application and drafting the permit documents. Jeff Koerner, P.E., is the Air Permitting Supervisor responsible for reviewing and editing the proposed letter of authorization. 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.

5. REFERENCES

1. "Electrostatic Precipitator". Hamon-research-Cottrell Air Pollution Control. November 12, 2010
http://hamon-researchcottrell.com/tech_espfundamentals
2. "Electrostatic Precipitator Knowledge Base". Neundorfer. November 12, 2010
http://www.neundorfer.com/knowledge_base/electrostatic_precipitators.aspx
3. "AP-42 Factors". EPA. November 12, 2010
<http://www.epa.gov/ttn/chief/ap42/ch01/final/c01s01.pdf>
4. "ESP Design Review". Neundorfer. November 11, 2010
<http://www.neundorfer.com/FileUploads/CMSFiles/ESP%20DesignReview%5B0%5D.pdf>

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

5. EPA. Operation and Maintenance Manual for Electrostatic Precipitators. Cincinnati, Ohio: EPA, September 1985.

Livingston, Sylvania

From: Livingston, Sylvania
Sent: Wednesday, December 08, 2010 5:09 PM
To: 'jovick@southernco.com'
Cc: 'gdwaters@southernco.com'; 'gnterry@southernco.com'; Bradburn, Rick; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Gibson, Victoria; Koerner, Jeff; Coggins, Heidi; Walker, Elizabeth (AIR)
Subject: Gulf Power Company - Crist Electric Generating Plant; 0330045-032-AC
Attachments: 0330045-032-AC_Intent.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0330045.032.AC.D_pdf.zip

Owner/Company Name: GULF POWER COMPANY
Facility Name: CRIST ELECTRIC GENERATING PLANT
Project Number: 0330045-032-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: ESCAMBIA
Processor: Heidi Coggins

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. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvania

From: Vick, James O. [JOVICK@southernco.com]
Sent: Thursday, December 09, 2010 10:27 AM
To: Livingston, Sylvania
Subject: RE: Gulf Power Company - Crist Electric Generating Plant; 0330045-032-AC

We are in receipt.

*Jim Vick
Director Environmental Affairs
8-420-6311
850-444-6311
Cell: 850-982-6204
Have a great day.*

From: Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, December 08, 2010 4:09 PM
To: Vick, James O.
Cc: Waters, G. Dwain; Terry, Greg N.; Bradburn, Rick; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; Koerner, Jeff; Coggins, Heidi; Walker, Elizabeth (AIR)
Subject: Gulf Power Company - Crist Electric Generating Plant; 0330045-032-AC

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[http://ARM-
PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0330045.032.AC.D_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0330045.032.AC.D_pdf.zip)

Owner/Company Name: GULF POWER COMPANY
Facility Name: CRIST ELECTRIC GENERATING PLANT
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Livingston, Sylvania

From: Waters, G. Dwain [GDWATERS@southernco.com]
Sent: Wednesday, December 08, 2010 6:26 PM
To: Livingston, Sylvania; Vick, James O.
Cc: Terry, Greg N.; Bradburn, Rick; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; Koerner, Jeff; Coggins, Heidi; Walker, Elizabeth (AIR)
Subject: RE: Gulf Power Company - Crist Electric Generating Plant; 0330045-032-AC

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

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

From: Livingston, Sylvania [<mailto:Sylvia.Livingston@dep.state.fl.us>]
Sent: Wednesday, December 08, 2010 4:09 PM
To: Vick, James O.
Cc: Waters, G. Dwain; Terry, Greg N.; Bradburn, Rick; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; Koerner, Jeff; Coggins, Heidi; Walker, Elizabeth (AIR)
Subject: Gulf Power Company - Crist Electric Generating Plant; 0330045-032-AC

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One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

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AIR REGULATION



Certified Mail
1070 1060 0001 3093 4126

October 20, 2010

Ms. Elizabeth Walker
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Mail Station #5505
Tallahassee, Florida 32399-2400

Dear Ms. Walker:

RE: CRIST ELECTRIC GENERATING PLANT
PROPOSED UNIT 6 ESP PROJECT
AIR PERMIT APPLICATION NO. 2739-1
PE CERTIFICATION

Please find enclosed Gulf Power's PE Certification Document for the above referenced permit application to rebuild the Electrostatic Precipitator at the Crist Electric Generating Plant, Unit 6. An electronic EPSAP application for this project was submitted on October 20, 2010.

Please call me at (850) 444 – 6527 regarding any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Dwain Waters Q.E.P." with a stylized flourish at the end.

G. Dwain Waters, Q.E.P.
Special Projects and Environmental Assets Coordinator

cc: w/att: Greg Terry, Gulf Power
John Dominey, Gulf Power
Terry Wright, Gulf Power

Electronic Permit Submittal and Processing System (EPSAP) Professional Engineer Signature Document

"This document is signed and sealed to secure the data in this permit application and any attached files that were submitted electronically as described in Florida Department of Business and Professional Regulation, Board of Professional Engineers, Procedures for Signing and Sealing Electronically Transmitted Plan, Specifications, Reports or other Documents, Rule 61G15-23.003., F.A.C.."

EPSAP Application Number: 2739-1
Facility Identification Number: 0330045
Facility Owner/Company Name: GULF POWER COMPANY

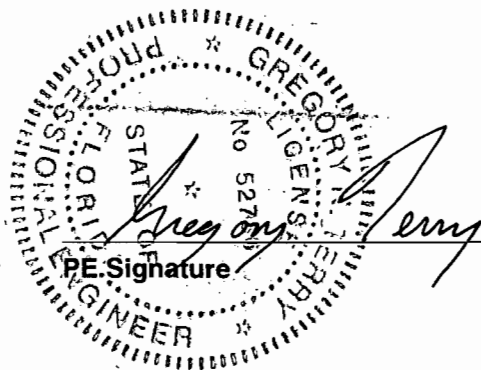
Purpose of Application:
 Air construction permit.

Signature File Created: 10/20/2010 11:27:12 AM

File Description	Authentication Code
Submitted Application Data	BB4A2A9E75957D9E6E0C0E565EA73D8A1267D443
Uploaded Facility Documents:	
Crist_-_Facility_list_-_EPA.pdf	B23E90E55FF62F1C9C23AF153037B6FFF7883C8D
Crist_-_Facility_list_-_FDEP.pdf	C801C79CED3919A857254120E871F80A50B180AC
Uploaded Emissions Unit Documents:	
Crist 6 ESP Rebuild Schedule.pdf	18CE486A2D4F36A1C1D439D71C45A0EBA73D02D5
Crist 6 ESP SCOPE DEFINITION DOCUMENT.pdf	C8611E605E5D0C73D3C5371800A27CEF73908E1E
Crist 6 ESP Project.pdf	A99F2BF1EA5605679161F13598C69054B3FED867
Crist 6 ESP Strengthening Schedule.pdf	5092E69B394B52455B0C2B69D9710C09ABA5484A
CRPREC6101510.pdf	0F4039D500BD4F543FC4A308C9099887EF1BF579
Final Signature File	75EF27F27334C00DB6FF91C4D7F3ACBD859C24CA

Professional Engineer (PE): GREGORY TERRY License No: 52786

(sign and affix PE seal below)



Date

10/20/2010

Florida Department of
Environmental Protection

Memorandum

To: Trina Vielhauer, Bureau of Air Regulation
Through: Jeff Koerner, New Source Review Section *JK*
From: Heidi Coggins, New Source Review Section
Date: December 07, 2010
Subject: Draft Air Permit No. 0330045-032-AC
Gulf Power Company, Crist Electric Generating Plant
Crist Unit 6 ESP Project

Attached for your review is a draft minor air construction permit package for the existing Crist Electric Generating Plant which is located in Escambia County at 11999 Pate Street in Pensacola, Florida. Briefly, the draft permit authorizes Gulf Power Company to upgrade the existing electrostatic precipitator for Unit 6. The attached Technical Evaluation and Preliminary Determination provide a detailed description of the project and the rationale for permit issuance. The project does not trigger preconstruction review for Prevention of Significant Deterioration of Air Quality. Day 90 of the permitting time clock is January 18, 2011. I recommend your approval of the attached draft permit package.

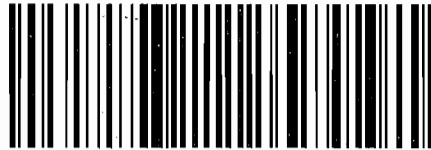
Attachments

TLV/jfk/hmc

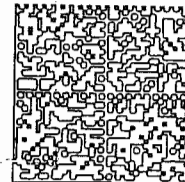


One Energy Place
Pensacola FL 32520

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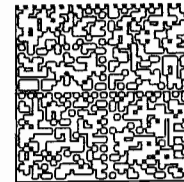


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Elizabeth Walker
FL Dept. of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400



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