

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

September 25, 2003

Mr. Gene L. Ussery, Jr.
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0100

CERTIFIED MAIL – Return Receipt Requested

Re: Request for Additional Information Regarding Title V Permit Revision to Revise the Multi-State Acid Rain
NO_x Averaging Plan
File No.: 0330045-006-AV

Dear Mr. Ussery:

The Department has received your Title V permit revision applications for the Lansing Smith Electric Generating Plant for the purpose of revising the Acid Rain NO_x averaging plan and inclusion of the terms and conditions of permit number 0050014-005-AC. However, in order to continue processing these applications, the Department is requesting the additional information outlined below. Should your response to any of the listed items require new calculations or result in changes to the submitted information, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form, certified by your Professional Engineer.

1. Pursuant to Rule 62-214.330(3), Florida Administrative Code (F.A.C.) and 40 CFR 76.11(b)(1), revisions to multi-state averaging plans must be submitted by January 1 of the year in which the change is to become effective. Because the revision application was submitted on August 1, 2003, the first year that the revision can be effective is 2004. Please resubmit the Phase II NO_x Averaging Plan (DEP form No. 62-210.900(1)(a)5.) with the appropriate years identified.
2. Pursuant to Rule 62-214.330(3)(b), F.A.C., the Designated Representative of the source containing the unit or units covered by the Acid Rain Part application must certify that every permitting authority (as defined at 40 CFR 70.2, adopted and incorporated by reference at Rule 62-204.800, F.A.C.) with jurisdiction over any other units included in the multi-unit compliance option has approved the submitted Acid Rain compliance plan revision. Please provide either the required certification or a schedule, in the form of a Title V compliance plan, for providing the required certification.
3. The requests to revise the averaging plan and to include permit number 0050014-005-AC were submitted as separate applications. It would save some processing time and the need for two different Public Notices if these projects were combined into one revision. If Gulf Power would prefer to combine these projects, please provide a waiver of the processing time-clock so that both projects may follow the processing clock for the averaging plan revision.


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Gulf Power Company
September 25, 2003
Page 2

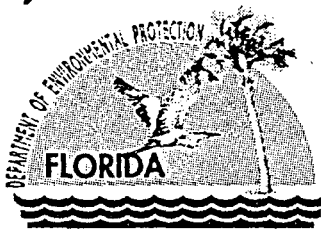
The above comments require a written response to the Department within ninety days of receipt of this notice unless additional time is requested pursuant to Rule 62-213.420(1)(b)6., F.A.C. If you should have any questions, please contact Jonathan Holtom, P.E., at (850) 921-9531, or me at (850) 921-9532.

Sincerely,


Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/jh

CC: Mr. Gregory N. Terry, P.E., Gulf Power Company
Mr. G. Dwain Waters, Gulf Power Company
Ms. Sandra Veazey, DEP, Northwest District Office (E-mail)
Mr. Greg Worley, U.S. EPA Region 4 (E-mail)
Mr. Robert Miller, U.S. EPA Headquarters (E-mail)



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NO_x Averaging Plan
File No.: 0330045-006-AV

Dear Mr. Ussery:

The Department has received your Title V permit revision application for the Crist Electric Generating Plant for the purpose of revising the Acid Rain NO_x averaging plan. However, in order to continue processing this application, the Department is requesting the additional information outlined below. Should your response to any of the listed items require new calculations or result in changes to the submitted information, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form, certified by your Professional Engineer.

1. Pursuant to Rule 62-214.330(3), Florida Administrative Code (F.A.C.) and 40 CFR 76.11(b)(1), revisions to multi-state averaging plans must be submitted by January 1 of the year in which the change is to become effective. Because the revision application was submitted on August 1, 2003, the first year that the revision can be effective is 2004. Please resubmit the Phase II NO_x Averaging Plan (DEP form No. 62-210.900(1)(a)5.) with the appropriate years identified.
2. Pursuant to Rule 62-214.330(3)(b), F.A.C., the Designated Representative of the source containing the unit or units covered by the Acid Rain Part application must certify that every permitting authority (as defined at 40 CFR 70.2, adopted and incorporated by reference at Rule 62-204.800, F.A.C.) with jurisdiction over any other units included in the multi-unit compliance option has approved the submitted Acid Rain compliance plan revision. Please provide either the required certification or a schedule, in the form of a Title V compliance plan, for providing the required certification.

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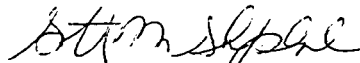
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Gulf Power Company
September 25, 2003
Page 2

For your information, the Department has been reviewing an Air Construction permit application from International Paper requesting a modification at their facility. With the application, they provided modeling results, based on the current meteorological data for the Pensacola area, that indicated there were exceedences of the Ambient Air Quality Standards for sulfur dioxide being caused by potential emissions from the Crist Plant, at the current permitted emission rates. Preliminary modeling performed by the Department concurs with these results. Our results show that the modeled exceedences can be avoided by reducing the allowable emission rate for SO₂ from 5.9 lb/MMBtu to 3.0 lb/MMBtu, for emissions units 004 – 007. Pursuant to Rule 62-204.220, F.A.C., the Department can not issue an air permit to sources that cause or contribute to the exceedence of an ambient air quality standard.

If you should have any questions, please contact Jonathan Holtom, P.E., at (850) 921-9531, or me at (850) 921-9532.

Sincerely,



Scott M. Sheplak, P.E.
Administrator
Title V Section

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