

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Mr. Gene L. Ussery, Jr.
 Vice President of Power Generation
 Gulf Power Company
 One Energy Place
 Pensacola, FL 32520-0328

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 Agent
 Addressee

B. Received by (Printed Name) *R. BEACH* C. Date of Delivery *3/5/03*

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7001 0320 0001 3692 6853

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT**
 (Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

7001 0320 0001 3692 6853

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
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Sent To *Gene L. Ussery, Jr.*
 Street, Apt. No., or P.O. No. *One Energy Place*
 City, State, ZIP+4 *Pensacola, FL 32520-0328*

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

2569 2692 3192 3692 4192 4692 5192 5692 6192 6692 7192 7692 8192 8692 9192 9692

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To: Gene L. Ussery, Jr.
 Street, Apt. No.; or PO Box: One Energy Place
 City, State, ZIP+4: Pensacola, FL 32520-0328

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input checked="" type="checkbox"/> <i>A. Bealle</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee
1. Article Addressed to: Mr. Gene L. Ussery, Jr. V.P. of Power Generation Gulf Power Company - Crist Electric Generating Plant One Energy Place Pensacola, FL 32520-0328	B. Received by (Printed Name) <i>R. BEACH</i> C. Date of Delivery <i>1-24-03</i>
2. <i>7001 0320 0001 3692 7058</i>	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No
	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

U.S. Postal Service CERTIFIED MAIL RECEIPT <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
OFFICIAL USE	
Postage:	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Sent To Gene L. Ussery, Jr. Street, Apt. No., or PO Box No. One Energy Place City, State, ZIP+4 Pensacola, FL 32520-0328	
PS Form 3800, January 2001 See Reverse for Instructions	

7001 0320 0001 3692 7058

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. G. Dwain Waters
 Air Quality Programs Supervisor
 Gulf Power Company
 One Energy Place
 Pensacola, FL 32520-0328

2. 7001 0320 0001 3692 7065

COMPLETE THIS SECTION ON DELIVERY

A. Signature *James Bladely* Agent Addressee

B. Received by (Printed Name) _____ C. Date of Delivery *12/23/03*

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

7001 0320 0001 3692 7065

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

Sent To: G. Dwain Waters
 Street, Apt. No. or PO Box: One Energy Place
 City, State, ZIP+4: Pensacola, FL 32520-0328

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

DEC 26 2002

BUREAU OF AIR REGULATION



Certified Mail

December 19, 2002

Jeffrey F. Koerner
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

COPY

Dear Mr. Koerner:

RE: CRIST ELECTRIC GENERATING PLANT
UNIT # 7 ESP & SCR APPLICATION
TITLE V Permit No: 0330045-001-AV

Thank you for meeting with representatives from Southern Company and me on November 26, 2002 to update the FDEP on the status of the Crist Unit 7 ESP and SCR Project and allowing us to start a dialog regarding SCR bypass operations. We will continue to update the Department as more information is available on specific issues regarding the operation of our SCR design and again invite you to visit our operations at Southern Company regarding advances in NOx and Mercury control technologies.

The purpose of this correspondence is to start the permitting process regarding the installation and operation of the new Electrostatic Precipitator (ESP) and Selective Catalytic Reduction (SCR) system planned for Crist Unit 7. As you are aware, an agreement between Gulf Power and the Florida Department of Environmental Protection (FDEP) was entered into on August 28, 2002 to ensure that Plant Crist located within the Pensacola, Florida Metropolitan Planning Area (PFMPA) supports the Area's compliance with the eight hour ozone ambient air quality standard and authorizes related cost recovery pursuant to Section 366.8255(1)(d) of the Florida Statutes as amended by the Florida Legislature in its 2002 session and signed into law by the Governor of the State of Florida. Through this agreement, FDEP and Gulf Power concur that installation of Selective Catalytic Reduction (SCR) controls at Crist Unit 7 as well as the implementation of other NOx reduction technologies on one or more of the other three coal-fired generating units at Plant Crist will be needed as part of a community wide effort to reduce ozone precursor compounds in the Pensacola Metropolitan Area. Due to

December 19, 2002

structural interference and performance concerns for the new SCR, a new Unit # 7 precipitator will also be constructed at a new location and completed by May 1, 2004. The Crist Unit #7 SCR will be completed by May 1, 2005 and NOx reductions on the remaining coal-fired units are required on or before May 1, 2007 pursuant to a final strategy and type of controls chosen. As a further part of this agreement, Gulf Power agrees to retire Crist Unit #1 within 120 days of the final order and Units #2 and #3 on or before May 1, 2006. These steps and changes are prudent for purposes of ensuring that Gulf Power's Plant Crist located within the FDMPA supports the Area's compliance with the eight hour ozone ambient air quality standard. A full copy of the agreement is attached as "Attachment 1" of this correspondence.

The construction of the Crist Unit 7 ESP and SCR will take several years and thus be completed in various phases as specific equipment is retired or replaced and new equipment is tied into the plant during annual outages. The first phase of the project is the planning and construction of infrastructure support facilities which include new parking lots, demolition and relocation of the maintenance shop, the creation of construction lay down area(s) and crane erection for the project. Coordination of these items has already begun with various county agencies with correspondences as needed to the local FDEP District. A summary of these activities are list below:

- State stormwater permitting (Chapter 62-25, F.A.C.)
- Federal NPDES stormwater construction permitting if applicable (delegated program to FL)
- Permitting extension to Crist potable water system to serve the construction village
- Development Review process with Escambia County. This is the process through which the county determines whether a "development" is in compliance with the local Land Development Code. The review is addressing local applicable permitting requirements such as:
 - county stormwater
 - wetlands review
 - potable water (we will provide our own water)
 - domestic waste (pursuing permitting of septic tank system for construction village)
 - parking are design requirements
 - road access (determined not applicable since Pate Road is privately owned)

The second phase of construction will be the installation of pile and foundations for the ESP and SCR. This process will include excavations into the current coal pile storage area east of the plant. The current schedule has this work beginning on March 3, 2003.

Phase 3 of the project is the erection of the precipitator and duct work support steel starting in April, 2003 with startup of the ESP earmarked for May, 2004. Phase 4 will the erection of the SCR and duct work support steel in September, 2003 with startup earmarked for May, 2005.

Design and specification of the Crist Unit 7 Electrostatic Precipitator (ESP) and Selective Catalytic Reduction (SCR) is enclosed as "Attachment 2". A gnatt chart with project milestone activities is included for an overall project summary and startup schedules. These documents should be considered "living" documents which will be revised as final engineering and conceptual designs are completed.

Mr. Jeffrey F. Koerner

Page 3

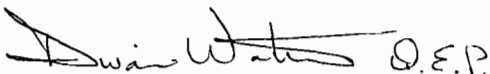
December 19, 2002

Pursuant to Section 403.111(1), Florida Statutes, Gulf Power requests that the Department maintain as confidential the information enclosed as Attachment 2 related to the ESP and SCR. The information describing the proposed ESP and SCR is proprietary and relates to a secret process and method, and Gulf Power Company would be severely prejudiced by disclosure of such information to competitors and to potential equipment and catalysts suppliers. Please confirm whether the Department agrees that this information should be kept confidential and exempt from the provisions of Section 119.07(1), Florida Statutes.

Please consider this as a request for a construction permit to replace the electrostatic precipitator and install a selective catalytic reduction (SCR) system at Crist Unit # 7. A professional engineer seal and responsible official certification statement are enclosed along with the revised Crist Unit 7 permit application pages as "Attachment 3".

Please let me know if you have questions or if further information is needed to process our construction permit request.

Sincerely,



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

cc: w/att: Jim. Vick, Gulf Power Company
Wright, Terry, Gulf Power Company
John Dominey, Gulf Power Company
Robin B. Hurst, Southern Company Services
Gary Perko, Hopping, Green & Sams
Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida

ATTACHMENT 1
FDEP- Gulf Power Ozone Agreement

AGREEMENT FOR THE PURPOSE OF ENSURING COMPLIANCE WITH OZONE AMBIENT AIR QUALITY STANDARDS

This agreement is entered into by the Florida Department of Environmental Protection (DEP) and Gulf Power Company (GULF), for the exclusive purposes as follows: (a) ensuring that GULF's electrical generating facility located within the Pensacola, Florida Metropolitan Planning Area (PFMPA) supports the Area's compliance with the eight hour ozone ambient air quality standard and (b) authorizing related cost recovery pursuant to Section 366.8255(1)(d) of the Florida Statutes as amended by the Florida Legislature in its 2002 session and signed into law by the Governor of the State of Florida.

WHEREAS:

I. GULF owns and operates the Crist Plant electrical generating facility in Escambia County, Florida. This plant generates electricity for the consuming public through the combustion of fossil fuel. The combustion of fossil fuels produces some of the precursor compounds that contribute to the formation of ozone in the ambient air.

II. Under the authority of the Clean Air Act, the U. S. Environmental Protection Agency (EPA) promulgated regulations dealing with air quality, including ambient air quality standards designed to protect human health and welfare. One such regulation places a limit on the amount of ozone that is considered to be acceptable in the ambient air during any 8-hour period (Ozone Standard).

III. Based upon the best available information, including ambient air quality monitoring data, DEP does not expect Escambia and Santa Rosa Counties to be in compliance with the Ozone Standard in 2004/2005 unless significant reductions of emissions of ozone precursor compounds are achieved in the Pensacola, Florida Metropolitan Planning Area.

IV. In its 2002 session, the Florida legislature adopted amendments to section 366.8255(1)(d) of the Florida Statutes to provide that an electric utility may seek recovery of costs and expenses prudently incurred pursuant to a voluntary agreement with DEP or EPA, for the purpose of ensuring compliance with ozone ambient air quality standards.

V. Representatives of DEP and GULF have met and arrived at a mutual agreement in furtherance of the purposes of Section 366.8255(1)(d)7 of the Florida Statutes as amended during the 2002 Florida legislative session.

VI. DEP and GULF concur that installation of Selective Catalytic Reduction (SCR) controls at Crist Unit #7 as well as the implementation of other NOx reduction

technologies on one or more of the other three coal-fired generating units at Plant Crist will be needed as part of a community wide effort to reduce ozone precursor compounds in the Pensacola Metropolitan Planning Area. Due to structural interference and performance concerns for the new SCR, a new Unit #7 precipitator will also be constructed at a new location and the SCR will be completed one year later in the location of the old Unit #7 precipitator.

VII. It is anticipated that the implementation of this agreement will result in an approximately 61% reduction [9,188 tons] in annual NOx emissions from the GULF Crist Plant based upon 1999 baseline data.

NOW THEREFORE, in consideration of the premises and the mutual agreements contained herein, and intending to be legally bound, the DEP and GULF hereby agree as follows:

1. By May 1, 2005, GULF, after obtaining necessary permits and approvals, will install and begin and continue operating an SCR system at Crist Unit #7 whenever the Crist Unit #7 is online. The SCR system is designed to achieve no less than an 85% reduction in the quantity of nitrogen oxides as measured at the SCR unit inlet (SCR Project). The SCR Project includes the installation of a new precipitator necessary to structurally accommodate installation of the SCR. See Exhibit "A" for proposed project schedule.
2. In addition to the Crist Unit #7 SCR Project, and in order to achieve an overall plant wide Btu weighted average of 0.2 lbs/mmbtu NOx emission rate as further specified in paragraph 3 below, Gulf agrees to conduct engineering studies on the feasibility of other NOx reduction technologies on one or more of the remaining three coal-fired units at Plant Crist. Such studies and related unit specific demonstration projects may include (but are not limited to) SCR, Selective Non-Catalytic Reduction (SNCR) technology, Over-Fired Air (OFA) technology, natural gas reburn technology, selective use of biomass fuel, etc. Gulf further agrees to complete these studies by May 1, 2005. In the event GULF identifies an SCR project for Crist Unit #6 as the NOx reduction technology, GULF will implement, begin and continue operating the SCR on Crist Unit #6 as described in paragraph 3 below by December 31, 2007. In the event GULF identifies a NOx reduction technology other than SCR on Crist Unit #6, GULF will select and implement one or more NOx reduction technologies on one or more of the three other Plant Crist coal-fired units by May 1, 2006. GULF will obtain written concurrence from DEP, before implementing such NOx reduction technology or technologies, that the use thereof is reasonable and necessary to achieve the overall plantwide emission rate of 0.2 lbs/mmbtu specified in paragraph 3 below.

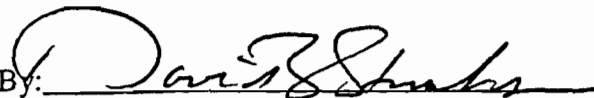
3. GULF will make necessary changes identified and within the timeframes set forth in paragraph 2 above, that will allow it to limit the overall 30 day average NOx emission rate at the Crist Plant to 0.2 lbs./mmbtu year-round except for periods in which Crist Unit #7 is offline. The emission rate shall be calculated pursuant to the formula set forth in Exhibit "B" to this agreement. While Crist Unit #7 is online, this 0.2 lbs./mmbtu will be achieved by utilizing the SCR system on Crist Unit #7 [discussed in paragraph 1 above] and the controls identified pursuant to paragraph 2 above. During such time as Crist Unit #7 may be offline between May 1 and September 15, GULF agrees to operate any NOx reduction technology or technologies DEP may have determined to be reasonable and necessary at other Plant Crist coal-fired units, pursuant to paragraph 2 above, unless prevented from doing so by circumstances beyond its reasonable control.
4. In addition to the NOx emission rate reduction strategies implemented pursuant to paragraphs 1 through 3 above, as a further part of this agreement to support the PFMPA's compliance with the eight hour ozone ambient air quality standard, GULF agrees to retire Crist Unit #1 within 120 days of receiving a final order from the Florida Public Service Commission as provided in paragraph 8 below. In addition, GULF further agrees to retire Crist Unit #2 and Crist Unit #3 on or before May 1, 2006.
5. In the event state or federal law changes to require a change in NOx emissions or the PFMPA is declared non-attainment for ozone, any reduction requirements would be in accordance with all applicable state and federal requirements. In addition, although Florida currently has no state statute providing for NOx trading or credits, GULF shall be entitled to retain all NOx reduction credits and trading rights that may be authorized by Florida law in the future.
6. In the event the FPSC issues a final order authorizing GULF to recover costs incurred pursuant to this agreement, by July 5, 2004, GULF will submit a Title V renewal application to the Department's Bureau of Air Regulation, 2600 Blair Stone Rd, MS 5500, Tallahassee, FL 32399 to incorporate the control technologies contained in this agreement as well as the NOx emission rate as described in paragraphs 1 through 3 above. DEP concurs that the changes envisioned by this agreement will not constitute "modifications" that trigger New Source Review.
7. DEP concurs that the steps and changes described in paragraphs 1 through 4 above are prudent for purposes of (a) ensuring that GULF's electrical generating facility located within the PFMPA supports the Area's compliance with the eight hour ozone ambient air quality standard and (b) authorizing

related cost recovery pursuant to Section 366.8255(1)(d) of the Florida Statutes as amended by the Florida Legislature in its 2002 session and signed into law by the Governor of the State of Florida.

8. This agreement is based upon the assumption that an order from the Florida Public Service Commission (FPSC) authorizing GULF to recover the costs incurred pursuant to this agreement through the Environmental Cost Recovery Clause is rendered final (final order) within 90 days of the execution of the agreement. A final order is one that is no longer subject to review or appeal by a court of competent jurisdiction. If a final order is not rendered within 90 days of the date of execution of this agreement, the parties concur that the dates and schedules herein are subject to revision solely by mutual agreement, in order to allow GULF to move forward with the activities described in paragraphs 1-4 above pending a final order by the FPSC. Gulf will exercise good faith in seeking approval of such cost recovery from the FPSC in a timely manner. DEP will support the efforts of GULF before the FPSC and in any subsequent review or appeal. If a final order is not rendered within 120 days of execution of this agreement, the entire agreement shall automatically become null and void unless extended by mutual written agreement of the parties within 30 days thereafter.
9. This agreement shall bind the parties hereto and those whom they represent and may be modified only in writing with the consent of both parties.
10. This agreement is entered into and effective on the date of the last signature of the parties below.

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

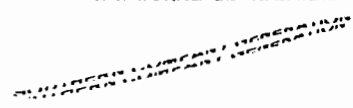
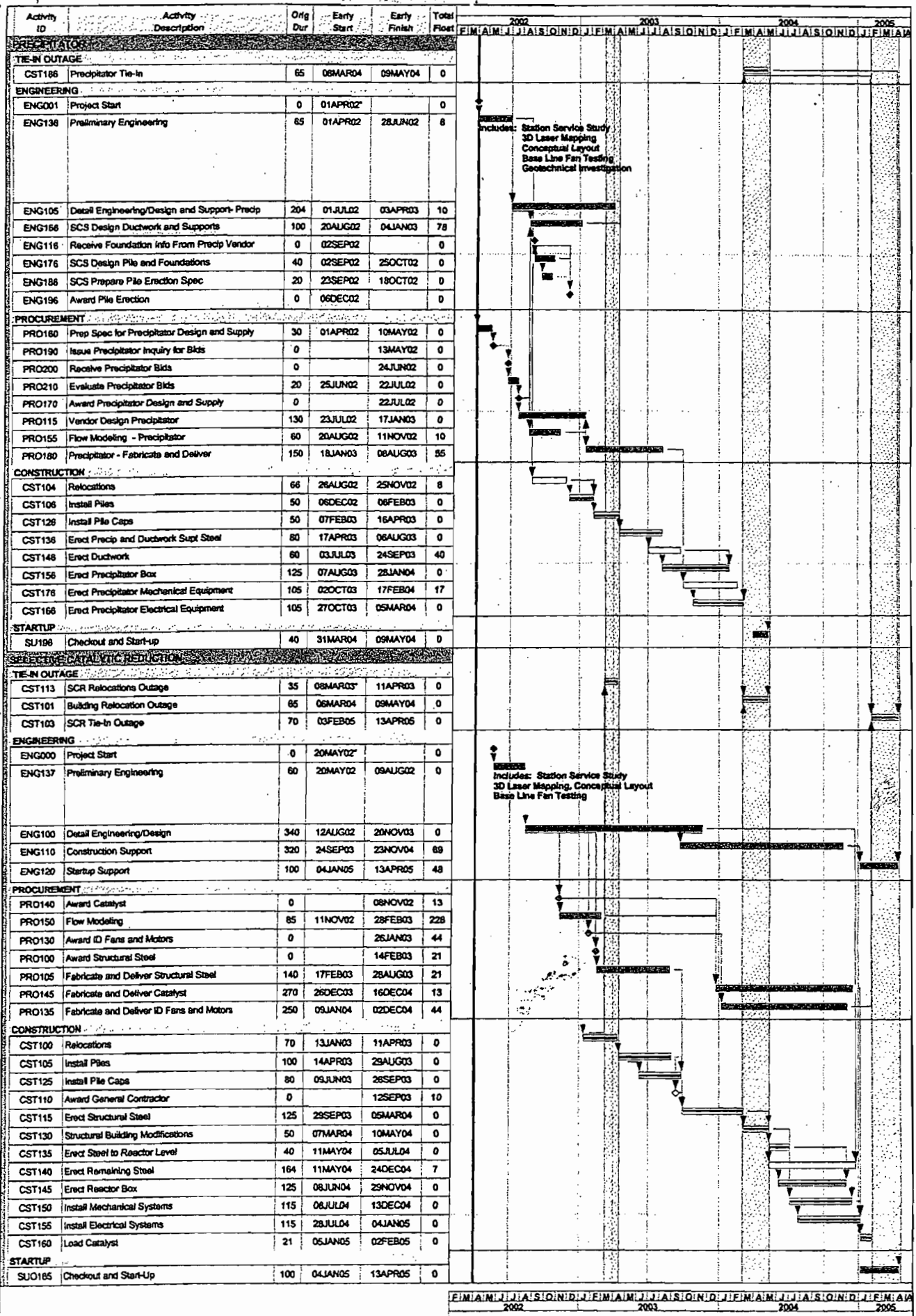
GULF POWER COMPANY

By: 
David B. Struhs
Secretary

By: 
Thomas A. Fanning
President and Chief Executive Officer

Date: August 28, 2002

Date: August 28, 2002



**AGREEMENT FOR THE PURPOSE OF ENSURING
COMPLIANCE WITH OZONE AMBIENT AIR
QUALITY STANDARDS**

Exhibit "B"

Gulf will measure its compliance with the emission rate limit set forth in paragraph 3 of this agreement by determining the Plant Crist NOx emission rate, when Crist Unit #7 has operated for 30 sequential days (which need not be consecutive) on a generating unit-specific btu weighted average basis pursuant to the following formula:

$$\begin{array}{l} \text{plant wide} \\ \text{daily} \\ \text{mmbtu} \\ \text{weighted} \\ \text{NOx rate} \end{array} = \frac{\sum_{\substack{\text{Units} \\ 4, 5, 6, 7}} \left[\left(\text{Unit \# daily mmbtu} \right) \times \left(24 \text{ hour avg unit \# NOx CEMs rate} \right) \right]}{\sum_{\substack{\text{Units} \\ 4, 5, 6, 7}} \left(\text{Unit \# daily mmbtu} \right)}$$

For the purposes of this calculation, a Crist Unit #7 operating day means any calendar day that Crist Unit #7 is online a minimum of 18 hours.

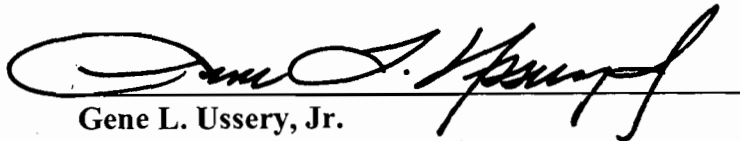
Unit # daily mmbtu (heat input) in the foregoing formula is determined by Plant Crist's daily as-burned fuel analysis

ATTACHMENT 3
RO & PE Certification Pages
Revised Permit Application Pages for Crist 7

**CRIST ELECTRIC GENERATING PLANT
UNIT # 7 ESP & SCR CONSTRUCTION APPLICATION
CERTIFICATION BY RESPONSIBLE OFFICIAL**

“I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Title V source for which this request is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this request are true, accurate and complete.”

Responsible Official Signature:

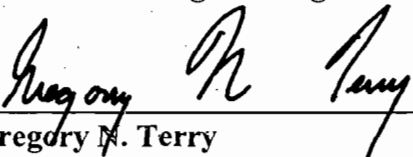

Gene L. Ussery, Jr.
Vice-President of Power Generation

12-11-02
Date:

**CRIST ELECTRIC GENERATING PLANT
Unit # 7 ESP & SCR CONSTRUCTION PERMIT
CERTIFICATION BY PROFESSIONAL ENGINEER**

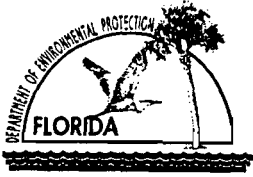
“I, the undersigned, am a registered professional engineer in the State of Florida and hereby certify to the best of my knowledge that all information for the construction and design of the Unit # 7 Electrostatic Precipitator and Selective Catalytic Reduction System at the Crist Electric Generating Plant is true, accurate and complete.”

Professional Engineer Signature:



Gregory N. Terry
Registration Number: 52786

12-17-02
Date



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Gulf Power Company	
2. Site Name: Crist Electric Generating Plant	
3. Facility Identification Number: 0330045 [] Unknown	
4. Facility Location: Pate Road Street Address or Other Locator: (off of 10 mile road) on Governors Bayou City: Pensacola County: Escambia Zip Code: 32520-0340	
5. Relocatable Facility? [] Yes [<input checked="" type="checkbox"/>] No	6. Existing Permitted Facility? [<input checked="" type="checkbox"/>] Yes [] No

Application Contact

1. Name and Title of Application Contact: G. Dwain Waters Air Quality Programs Supervisor		
2. Application Contact Mailing Address: Organization/Firm: Gulf Power Company Street Address: One Energy Place City: Pensacola State: FL Zip Code: 32520-0328		
3. Application Contact Telephone Numbers: Telephone: (850) 444 - 6527 Fax: (850) 444 - 6217		

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	<i>12-26-03</i>
2. Permit Number:	<i>0330045-005-AC</i>
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit number to be revised: _____

- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: _____

- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: _____

Reason for revision: _____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Project consists of the replacement of the Crist Unit 7 electrostatic precipitator and the addition of a selective catalytic reduction system. The Unit 7 ESP is scheduled to begin operation by May 1, 2004. The Unit 7 SCR is schedule to begin operation by May 1, 2005. Pile and foundation work is scheduled to begin on March 3, 2003.

2. Projected or Actual Date of Commencement of Construction: **March 3, 2003**

3. Projected Date of Completion of Construction: **May 1, 2004, May 1, 2005**

Application Comment

The Crist Unit 7 modifications outlined in this application are pollution control projects and are exempt from New Source Review. Some modifications are expected in the Economizer Control Damper, the Economizer Hopper, the Air Preheater and the Perheater Inlet in order to retrofit the Selective Catalytic Reduction System. These modifications will not increase emissions or add capacity to Crist Unit 7.

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION (All Emissions Units)

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Crist Unit 7 Electric Utility Boiler</p>			
<p>4. Emissions Unit Identification Number: <input type="checkbox"/> No ID</p> <p>ID: 007 <input type="checkbox"/> ID Unknown</p>			
<p>5. Emissions Unit Status Code: A</p>	<p>6. Initial Startup Date:</p>	<p>7. Emissions Unit Major Group SIC Code: 49</p>	<p>8. Acid Rain Unit? <input checked="" type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters) Crist Unit 7 is a Foster Wheeler front and rear wall fired, dry bottom boiler. The primary fuels are coal and natural gas. Distillate # 2 fuel oil is combusted as a secondary fuel.</p>			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Particulate Controls

Particulate emissions are controlled a Alstom cold side electrostatic precipitator replacing the existing Buell electrostatic precipitator in May, 2004.

NO_x Controls

Dry low-NO_x combustors and the addition of a selective catalytic reduction system in May, 2005.

2. Control Device or Method Code(s): **25 (dry low-NO_x); 065 Catalytic Reduction**

Emissions Unit Details

1. Package Unit:

Manufacturer: Westinghouse

Model Number:

2. Generator Nameplate Rating: 578 MW

3. Incinerator Information:

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: 6406.4 (HHV) mmBtu/hr
2. Maximum Incineration Rate: lb/hr tons/day
3. Maximum Process or Throughput Rate:
4. Maximum Production Rate:
5. Requested Maximum Operating Schedule: <p style="text-align: right;">24 hours/day 7 days/week 52 weeks/year 8,760 hours/year</p>
6. Operating Capacity/Schedule Comment (limit to 200 characters): <p>Unit 7 is capable of full load on coal and gas with # 2 fuel oil and "on spec" used oil as secondary fuels.</p>

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

See Attachment A-1	

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

<p>1. Identification of Point on Plot Plan or Flow Diagram? Stack</p>	<p>2. Emission Point Type Code: 2</p>	
<p>3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Common stack with Crist Unit 6</p>		
<p>4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: Crist Unit 6 – ARMS #006 Crist Unit 7 – ARMS #007</p>		
<p>5. Discharge Type Code: V</p>	<p>6. Stack Height: 450 feet</p>	<p>7. Exit Diameter: 23.2 feet</p>
<p>8. Exit Temperature: 270 °F</p>	<p>9. Actual Volumetric Flow Rate: 2462700 acfm</p>	<p>10. Water Vapor: 9.0 %</p>
<p>11. Maximum Dry Standard Flow Rate: dscfm</p>	<p>12. Nonstack Emission Point Height: feet</p>	
<p>13. Emission Point UTM Coordinates: Zone: 16 East (km): 478.500 North (km): 3381.300</p>		
<p>14. Emission Point Comment (limit to 200 characters):</p>		

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Boiler fired with pulverized bituminuous coal. Emissions related to ton burned.		
2. Source Classification Code (SCC): 1-01-002-02		3. SCC Units: Tons Burned (solid fuel)
4. Maximum Hourly Rate: 242.68	5. Maximum Annual Rate: 2,125,876.80	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 3.90	8. Maximum % Ash: 15.8	9. Million Btu per SCC Unit: 12800
10. Segment Comment (limit to 200 characters): Unit capable of full load with coal.		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Boiler fired with natural gas.		
2. Source Classification Code (SCC): 1-01-006-01		3. SCC Units: Million Cubic Feet Burned
4. Maximum Hourly Rate: 5.82	5. Maximum Annual Rate: 50,983.20	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.01	8. Maximum % Ash: 0.00	9. Million Btu per SCC Unit: 1060
10. Segment Comment (limit to 200 characters): Unit capable of full load with natural gas.		

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Boiler fired with No. 2 fuel oil. Emissions related to thousand gallons burned		
3. Source Classification Code (SCC): 1-01-005-01		3. SCC Units: Thousand Gallons Burned (all liquid fuel)
4. Maximum Hourly Rate: 9.29	5. Maximum Annual Rate: 81,406.68	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.50	8. Maximum % Ash: 0.10	9. Million Btu per SCC Unit: 138
10. Segment Comment (limit to 200 characters): Fuel use limited to startup, flame stabilization and used oil utilization for energy recovery.		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
SO2			EL
SAM			NS
NOX	065	024	EL
CO			NS
PM	010		EL
PM10			NS
VOC			NS
HCL			NS
H107 (HF)			NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: SO2		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 34,166.21 lb/hour		4. Synthetically Limited? <input type="checkbox"/>	
		149,648.01 tons/year	
5. Range of Estimated Fugitive Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: 38 (S%).95 = SO2 lbs/ton of coal burned Reference: AP-42		7. Emissions Method Code: 3	
8. Calculation of Emissions (limit to 600 characters): [38 (3.9%S) .95] = 140.79 SO2 lbs/ton of coal thus; [140.79 lb/ton] [242.675 ton/hr] = 34, 166.21 SO2 lbs/hr thus; [140.79 lb/ton] [242.675 ton/hr] [8760 hr/yr] [1/2000 lb/ton] = 149,648.01 SO2 ton/yr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): The allowable emissions of this pollutant is 5.9 SO2 lb/MMBTU heat input per Rule 62-296.405(1)(2)2c. No change in emissions due to the replacement of the ESP or addition of the SCR project.			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: Rule		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 5.9 lbs/mmbtu		4. Equivalent Allowable Emissions: 34,364.60 lb/hour 150,503.80 tons/year	
5. Method of Compliance (limit to 60 characters): Daily 24 hour average based on CEM or FS&A			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): See specific condition C23. in Title V Permit for compliance demonstration to standard.			

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: SAM	2. Total Percent Efficiency of Control:
3. Potential Emissions: 276.93 lb/hour 1,212.94 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 1.14114 SAM lb/ton of coal burned Reference: AP-42	7. Emissions Method Code: 3
8. Calculation of Emissions (limit to 600 characters): [1.14114 lb/ton of coal] [242.675 ton/hr] [8760 hr/yr] [1/2000 lb/ton] = 1212.9 ton/yr AP-42 factor	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): No change in emissions due to the replacement or the ESP or addition of the SCR project.	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: NOx Revised for SCR	2. Total Percent Efficiency of Control: 85% in May 1, 2005
3. Potential Emissions: 789.9 lb/hour	3459.79 tons/year 4. Synthetically Limited? <input checked="" type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 3.255 lb/hr Reference: AP-42 @ 85% reduction	7. Emissions Method Code: 5
8. Calculation of Emissions (limit to 600 characters): [21.7 @85% reduction] = 3.255 NOx lb/ton of coal fired [3.255 lb/ton of coal] [242.675 ton/hr] [8760 hr/yr] [1/2000 lb/ton] = 3459.79 ton/yr assumes AP-42 factor @ 85% reduction for SCR starting in May, 2005	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): There is no change in emissions due to the replacement of the ESP. There is a potential annual reduction of NOx emissions from the installation of the SCR on the unit in May, 2005 of (14,416 – 3460) approximately 10,956 tons per year.	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: FDEP – Gulf Power Ozone Agreement	2. Future Effective Date of Allowable Emissions: May 1, 2006 or 2007.*
3. Requested Allowable Emissions and Units: NOx average for Facility @ 0.20 lb/mbtu	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters): NOx CEMS	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Crist Unit 4-5-6-7 plant wide 30 day average to meet 0.20 lb/MMBTU hr average when Unit 7 is on-line. * Future compliance date based on strategy to be filed later.	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: CO	2. Total Percent Efficiency of Control:
3. Potential Emissions: 121.9 lb/hour	4. Synthetically Limited? <input type="checkbox"/>
5. Range of Estimated Fugitive Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year	
6. Emission Factor: 0.5 CO lb/ton of coal Reference: AP-42	7. Emissions Method Code: 3
8. Calculation of Emissions (limit to 600 characters): [0.5 lb/ton of coal] [242.675 ton/hr] [8760 hr/yr] [1/2000 lb/ton] = 531.46 ton/yr AP-42 factor	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): No change in emissions due to the replacement of the ESP or addition of the SCR project.	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 99.6%
3. Potential Emissions: 153.4 lb/hour	671.76 tons/year 4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.04 (%ash) = PM lb/ton of coal fired Reference: AP-42 @ 99.6% ESP Efficiency	7. Emissions Method Code: 5
8. Calculation of Emissions (limit to 600 characters): <p>[0.04(%Ash) = PM lbs/ton of coal fired based on 99.6% efficiency [0.04(15.8%) = .632 PM lbs/ton of coal fired [0.632 lb/ton of coal] [242.675 ton/hr] = 153.37 lb/hr [0.632 lb/ton of coal] [242.675 ton/hr] [8760 hr/yr] [1/2000 lb/ton] = 671.76 ton/yr AP-42 factor using 99.6% efficiency</p>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): <p>Original Title V emissions estimate based on 99.2% efficiency @ an average ash content of 9.3%. Revised estimates based on 99.6% efficiency @ maximum ash content of 15.8%. Net reduction in potential emissions estimated is (790.81-671.76) = 119.05 PM tons/year from the new ESP.</p>	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: Rule	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.10 lb/mbtu	4. Equivalent Allowable Emissions: 582.40 lb/hour 2,550.91 tons/year
5. Method of Compliance (limit to 60 characters): Annual Method 17 Particulate Test	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Particulate standatd is 0.1 lb/mmbtu in 62-296.405(1)(b) and test method is 62-296-405(1)(e)2.	

Emissions Unit Information Section _____ of _____

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: Rule	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.30 lb/mbtu	4. Equivalent Allowable Emissions: 1,747.20 lb/hour 956.59 tons/year
5. Method of Compliance (limit to 60 characters): Annual Method 17 Particulate Test	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Excess emissions under 62-210.700 (3). Test method is 62-296-405(1)(e)2.	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: PM10		2. Total Percent Efficiency of Control: 99.6	
3. Potential Emissions: 95.9 lb/hour		4. Synthetically Limited? <input type="checkbox"/>	
		419.85 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.025(%ash) = PM10 lb/ton of coal fired Reference: AP-42 using 99.6% efficiency		7. Emissions Method Code: 3	
8. Calculation of Emissions (limit to 600 characters): <p>[0.025(%Ash) = PM10 lbs/ton of coal fired based on 99.6% efficiency [0.025(15.8%) = .395 PM10 lbs/ton of coal fired [0.395 lb/ton of coal] [242.675 ton/hr] = 95.86 lb/hr [0.395 lb/ton of coal] [242.675 ton/hr] [8760 hr/yr] [1/2000 lb/ton] = 419.85 ton/yr AP-42 factor using 99.6% efficiency</p>			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): <p>Original Title V emissions estimate based on 99.2% efficiency @ an average ash content of 9.3%. Revised estimates based on 99.6% efficiency @ maximum ash content of 15.8%. Net reduction in potential emissions estimated is (494.26-419.85) = 74.41 PM10 tons/year from the new ESP.</p>			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: VOC	2. Total Percent Efficiency of Control:
3. Potential Emissions: 14.56 lb/hour 63.77 tons/year	4. Synthetically Limited? [<input type="checkbox"/>]
5. Range of Estimated Fugitive Emissions: [<input type="checkbox"/>] 1 [<input type="checkbox"/>] 2 [<input type="checkbox"/>] 3 _____ to _____ tons/year	
6. Emission Factor: 0.06 VOC lb/ton of coal fired Reference: AP-42	7. Emissions Method Code: 3
8. Calculation of Emissions (limit to 600 characters): <p style="margin-left: 40px;"> [0.06 lb/ton of coal] [242.675 ton/hr] = 14.56 VOC lb/hour [0.06 lb/ton of coal] [242.675 ton/hr] [8760 hr/yr] [1/2000 lb/ton] = 63.77 ton/yr AP-42 factor </p>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): <p style="margin-left: 40px;">No change in emissions due to the replacement of the ESP or addition of the SCR project.</p>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: HCL		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 422 lb/hour		4. Synthetically Limited? <input type="checkbox"/>	
		1848.36 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: tons coal x 2000lbs/ton x ppm Cl in coal x 1E-6 x 1.028 lb HCL = lbs HCL released		7. Emissions Method Code: 5	
Reference: EPRI Emissions Factor Handbook			
8. Calculation of Emissions (limit to 600 characters): $[\text{tons coal}] [2000 \text{ lb/ton}][\text{ppm Cl}] [1\text{E-}6 \times 1.028\text{lb HCL/lb CL/hr}] = \text{HCL lbs released}$ $[242.675 \text{ tons coal/hr}] [2000][846 \text{ ppm}] [1\text{E-}6 \times 1.028 \text{ lb HCL}] = 422 \text{ lbs/hr}$ $[422 \text{ HCL lbs/hr}] [8760] [1/2000 \text{ lb/ton}] = 1848.36 \text{ HCL tons/yr}$			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): No change in emissions due to the replacement of the ESP or addition of the SCR project.			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: HF	2. Total Percent Efficiency of Control:
3. Potential Emissions: 36.8 lb/hour	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: tons coal x 2000lbs/ton x ppm F in coal x 1E-6 x 1.053 lb HF x 0.90= lbs HF released	7. Emissions Method Code: 5
Reference: ERPI Emissions Factor Handbook	
8. Calculation of Emissions (limit to 600 characters): [tons coal] [2000 lb/ton][ppm F] [1E-6 x 1.028lb HF/lb F/hr][0.90] = HF lbs released [242.675 tons coal/hr] [2000][80ppm] [1E-6 x 1.053 lb HF][0.90] = 36.8 lbs/hr [36.8 HF lbs/hr [8760] [1/2000 lb/ton] = 161.2 HF tons/yr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): No change in emissions due to the replacement of the ESP or addition of the SCR project.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: VES	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 40 % Exceptional Conditions: 60 % Maximum Period of Excess Opacity Allowed: 60 min/hour	
4. Method of Compliance: EPA Reference Method 9 or Opacity Monitoring System	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.405(1)(a)	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 40 % Exceptional Conditions: 100 % Maximum Period of Excess Opacity Allowed: 60 min/hour	
4. Method of Compliance: EPA Reference Method 9 or Opacity Monitoring System	
5. Visible Emissions Comment (limit to 200 characters): Excess emissions resulting from startup, shutdown, or malfunction not-to-exceed 2 hours in any 24 hour period unless authorized by FDEP for a longer duration. Rule 62-210.700(1), F.A.C.	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 5

1. Parameter Code: VE	2. Pollutant(s):
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Lear Siegler Model Number: SS-4542 Serial Number: 926232	
5. Installation Date: 12-01-1992	6. Performance Specification Test Date: 09-03-2002
7. Continuous Monitor Comment (limit to 200 characters): Unit required to monitor opacity under 62-296.405(1)(f)1.	

Continuous Monitoring System: Continuous Monitor 2 of 5

1. Parameter Code: Flow	2. Pollutant(s):
3. CMS Requirement: 40 CFR Part 75	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Required by 40 CFR Part 75 (Acid Rain Program) and 40 CFR Subpart Da. Specific CEMS information will be provided to FDEP when available.	

Emissions Unit Information Section _____ of _____

Continuous Monitoring System: Continuous Monitor 3 of 5

1. Parameter Code: Flow	2. Pollutant(s):
3. CMS Requirement: 40 CFR Part 75	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Required by 40 CFR Part 75 (Acid Rain Program) and 40 CFR Subpart Da. Specific CEMS information will be provided to FDEP when available.	

Continuous Monitoring System: Continuous Monitor 4 of 5

1. Parameter Code: EM	2. Pollutant(s): NOx
3. CMS Requirement: 40 CFR Part 75	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: TECO Model Number: 42C Serial Number: 42C-73834-374	
5. Installation Date: 06-19-02	6. Performance Specification Test Date: 06-26-02
7. Continuous Monitor Comment (limit to 200 characters): Required by 40 CFR Part 75 (Acid Rain Program).	

Emissions Unit Information Section _____ of _____

Continuous Monitoring System: Continuous Monitor 5 of 5

1. Parameter Code: EM	2. Pollutant(s):
3. CMS Requirement: 40 CFR Part 75	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: TECO Model Number: 43C Serial Number: 43C-72788-372	
5. Installation Date: 06-19-02	6. Performance Specification Test Date: 06-26-02
7. Continuous Monitor Comment (limit to 200 characters): <p style="text-align: center;">Required by 40 CFR Part 75 (Acid Rain Program).</p>	

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Gulf Power Company
One Energy Place
Pensacola, Florida 32520

Air Permit No. 0330045-005-AC
Crist Electric Generating Plant
Unit 7 ESP/SCR Project

Authorized Representative:

Mr. Gene L. Ussery, Jr., Vice President of Power Generation

Enclosed is Final Air Permit No. 0330045-005-AC, which authorizes the construction of a new electrostatic precipitator and the installation of a new selective catalytic reduction system for Unit 7 at the existing Crist Electric Generating Station, which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida. As noted in the Final Determination (attached), only minor changes were made. This permit is issued pursuant to Chapter 403, Florida Statutes.

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 thirty (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.


for Trina Vielhauer, Chief
Bureau of Air Regulation

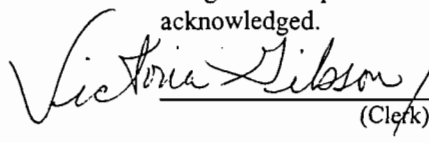
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 3/3/03 to the persons listed:

Mr. Gene L. Ussery, Jr., Gulf Power Co.*
Mr. G. Duane Waters, Gulf Power Co.
Mr. Gregory N. Terry, Gulf Power Co.
Ms. Sandra Veazey, NWD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Victoria Gibson / March 3, 2003
(Clerk) (Date)

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Gene L. Ussery, Jr.
 Vice President of Power Generation
 Gulf Power Company
 One Energy Place
 Pensacola, FL 32520-0328

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 X *G. Beach* Agent Addressee

B. Received by (Printed Name) *R. BEACH* C. Date of Delivery *3/5/03*

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7001 0320 0001 3692 6853

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)**

OFFICIAL USE

7001 0320 0001 3692 6853

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
 Here

Sent To *Gene L. Ussery, Jr.*
 Street, Apt. No. or P.O. No. *One Energy Place*
 City, State, ZIP+4 *Pensacola, FL 32520-0328*

PS Form 3800, January 2001

See Reverse for Instructions

FINAL DETERMINATION

PERMITTEE

Gulf Power Company
One Energy Place
Pensacola, Florida 32520

PERMITTING AUTHORITY

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

PROJECT

Crist Electric Generating Plant
Unit 7 - ESP/SCR Project
Air Permit No. 0330045-005-AC

This permit authorizes the construction of a new electrostatic precipitator and the installation of a new selective catalytic reduction system for Unit 7 at the existing Crist Electric Generating Station, which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida.

NOTICE, PUBLICATION, AND COMMENTS

The Department distributed an "Intent to Issue Permit" package on February 14, 2003. The applicant published the "Public Notice of Intent to Issue" in the Pensacola News Journal on February 16, 2003. The Department received the proof of publication on February 25, 2003. No comments on the draft permit were received.

CONCLUSION

Only minor typographical errors were corrected. The final action of the Department is to issue the permit with the changes described above.



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

PERMITTEE

Gulf Power Company
One Energy Place
Pensacola, FL 32520-0328

Authorized Representative:

Gene L. Ussery, Jr., V.P. of Power Generation

Crist Electric Generating Plant
Unit 7 ESP/SCR Project
Facility ID No. 0330045
SIC No. 4911
Air Permit No. 0330045-005-AC
Permit Expires: December 1, 2005

PROJECT AND LOCATION


This permit authorizes the construction of a new electrostatic precipitator and the installation of a new selective catalytic reduction system for Unit 7 at the existing Crist Electric Generating Station, which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida. The map coordinates are: Zone 16; 478.50 km East; and 3381.30 km North.

STATEMENT OF BASIS

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

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices



Howard L. Rhodes, Director
Division of Air Resources Management

3/3/03
(Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

The existing plant consists of seven fossil fuel fired steam generators and two fly ash silos. Natural gas is the primary fuel for Units 1, 2 and 3. Pulverized coal is the primary fuel for Units 4, 5, 6 and 7. Fuel oil is used as supplemental fuel in all seven of the units. The following units are affected by this air construction permit.

ID	Emission Unit Description
001	Boiler No. 1 (Phase II Acid Rain Unit)
002	Boiler No. 2 (Phase II Acid Rain Unit)
003	Boiler No. 3 (Phase II Acid Rain Unit)
004	Boiler No. 4 (Phase I and II Acid Rain Unit)
005	Boiler No. 5 (Phase I and II Acid Rain Unit)
006	Boiler No. 6 (Phase I Acid Rain Unit)
007	Boiler No. 7 (Phase I Acid Rain Unit)

REGULATORY CLASSIFICATION

Title III: The existing facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The existing facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

RELEVANT DOCUMENTS

The permit application and additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct, modify, or operate emissions units at this facility shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all permit applications shall also be sent 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, Pensacola, Florida 32501-5794.
3. Appendices: The following Appendices are attached as part of this permit: Appendix CF (Citation Format); Appendix GC (General Conditions); and Appendix SC (Standard Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated 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. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-4, 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
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. Construction Approval: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Rule 62-210.200(76), F.A.C. defines *construction* as, "The act of performing on-site fabrication, erection, installation or modification of an emissions unit or facility of a permanent nature, including installation of foundations or building supports; laying of underground pipe work or electrical conduit; and fabrication or installation of permanent storage structures, component parts of an emissions unit or facility, associated support equipment, or utility connections. Land clearing and other site preparation activities are not a part of the construction activities." Such permits shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions units. 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 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. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU 007 – Boiler No. 7

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

Emissions Unit No. 007

Description: Unit 7 is a Foster Wheeler front and rear wall fired, dry bottom boiler that began commercial operation on August 1, 1973.

Fuels: coal, natural gas, new No. 2 fuel oil and/or on-specification used oil

Capacity: 6406 MMBtu/hour when firing pulverized coal and/or natural gas

PM Controls: Cold side electrostatic precipitator

NOx Controls: Low NOx burners and selective catalytic reduction

Continuous Monitors: CO₂, NO_x, SO₂, opacity, stack gas flow, and ammonia injection rate

Stack Parameters: Units 6 and 7 share a common stack that is 450 feet tall with a diameter of 23.2 feet. The volumetric flow rate of Unit 7 at permitted at capacity is approximately 2,463,000 acfm.

{Permitting Notes: Based on the current Title V air operation permit, Unit 7: is regulated under Rule 62-296.405, F.A.C. (Fossil Fuel Fired Steam Generators > 250 MMBtu/Hour Heat Input); predates the requirements of Rule 62-212.400, F.A.C. (PSD Preconstruction Review); and is regulated under Phase I of the federal Acid Rain Program (40 CFR 75).}

{Permitting Note: On August 28, 2002, Gulf Power Company and the Florida Department of Environmental Protection entered into an agreement titled, "Agreement for the Purpose of Ensuring Compliance with the Ozone Ambient Air Quality Standards" (Agreement). The "Agreement" is the basis for many of the following permit conditions.}

PREVIOUS APPLICABLE REQUIREMENTS

1. Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for this emissions unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070, F.A.C.]

EQUIPMENT AND CONSTRUCTION

2. Electrostatic Precipitator (ESP): To control emissions of particulate matter, the permittee shall construct, tune, operate, and maintain a new cold-side ESP for Unit 7 to replace the existing equipment as described in the application, approved drawings, plans, and other documents on file with the Department.

{Permitting Note: Alstom Power Inc. designed the new cold-side ESP, which will generally consist of two gas tight chambers. Each chamber will have three cells with five electrical fields per cell. There will be at least 30 total electrical fields (transformer-rectifier sets) with each field having approximate overall dimensions of 29 feet wide by 12 feet deep with a height of about 49 feet. The collecting plates will consist of 16-gage steel and have a spacing of approximately 15.75 inches. The discharge electrodes will be rigid. Each of the 30 transformer-rectifier sets will be controlled by a microprocessor-based controller with field energizing optimization and high-speed field bus communication. The preliminary design control efficiency is 99.64%.

A tumbling hammer rapping system will be used to remove captured fly ash from collecting plates. The maximum rapping density will be about 1163 square feet of collecting electrode per rapper. The preliminary design uses the existing control system to adjust the cleaning cycle and frequency to minimize opacity spikes due to re-entrainment. Approximately sixty hoppers (two per field) will hold the collected ash. The new ash collection hoppers will be tied in to the existing dry fly ash removal system. The ESP will also be equipped with a data management system for remote control and communications with the high

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU 007 – Boiler No. 7

voltage power supplies and rapper control systems.

This information is based on the preliminary design and is subject to change. The permittee shall update this information as necessary during the process of final design and installation. [Design; Paragraph 1 of the Agreement]

3. **Selective Catalytic Reduction (SCR) System:** The permittee shall construct, tune, operate, and maintain a new SCR system for Unit 7 to reduce emissions of nitrogen oxides (NOx) as described in the application, approved drawings, plans, and other documents on file with the Department. The SCR system shall be designed to achieve no less than an 85% reduction in NOx emissions as measured across the SCR unit inlet and outlet. The designed target ammonia slip level is 5 ppmv based on a 24-hour average. The storage of ammonia shall comply with all applicable requirements of the Chemical Accident Prevention Provisions in 40 CFR 68.

{Permitting Note: Southern Company Services Inc. designed the new SCR system, which will generally consist of the following:

- **Catalyst Structure:** *Arranged in four layers, the catalyst is a plate-type structure fabricated by applying ceramic catalyst material to a perforated stainless steel mesh grid plate. The active catalyst component is vanadium pentoxide. The system has an operational temperature range between 600° to 800° F (optimum temperature > 680° F). The initial configuration will have a catalyst volume of approximately 26,000 cubic feet in 2½ layers. As the catalyst gradually deactivates through use, the remaining layers will be filled and old layers replaced. With all four potential layers in place, the catalyst volume is approximately 41,600 cubic feet.*
- **Ammonia Injection System:** *Anhydrous ammonia will be delivered by truck or rail and stored on site in two 20,500 gallons tanks. Ammonia is distributed into the SCR inlet duct through the ammonia injection grid (AIG), which is divided into about two dozen zones. Each zone is equipped with a flow indicator and manual control valve for tuning the AIG to match the inlet NOx profile. A static mixer installed upstream of the AIG creates flow resistance, flattens this profile, and makes gas flow uniform. A second static mixer is installed downstream of the AIG. The elements of this mixer are precisely oriented with the AIG injection points to impart a swirl to the diluted ammonia and promote good mixing with the flue gas. A manual gas sampling grid (GSG) is installed downstream of the last catalyst layer, which allows a high-resolution traverse of the flue gas stream. Gas composition data collected from the GSG is used to precisely adjust and tune the AIG. The preliminary design is based on a 0.95 molar ratio of ammonia-to-NOx.*
- **Ammonia Control System:** *The ammonia control system consists of a control loop with a cascaded, feed-forward control scheme. Process monitors will provide NOx emission rate data collected at the inlet to and the outlet from the SCR system. The ammonia injection rate is set based on a variety of input data including the measured NOx rates at the SCR inlet/outlet, the outlet NOx set point, the heat input to the boiler, the actual NOx rate measured by the stack monitor, and a scaling factor based on the molecular weights of ammonia and NOx. The system is capable of continually adjusting flow control valves to fine-tune the ammonia injection rate based on changing gas stream conditions.*
- **SCR Bypass:** *The SCR design incorporates dampers and ductwork to provide the capability of bypassing the SCR system. The bypass is most commonly used to gradually heat or cool the catalyst structure to minimize thermal fatigue during startup and shutdown. During catalyst maintenance and repair, it would also allow access to the SCR reactor without requiring complete shutdown of the Unit 7 boiler.*

This information is based on the preliminary design and is subject to change. The permittee shall update this information as necessary during the process of final design and installation. [Design; Paragraph 1 of

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU 007 – Boiler No. 7

the Agreement; Rule 62-204.800, F.A.C.; 40 CFR 68]

4. Updated Designs: The permittee shall update the Department with final design specifications and any substantial changes made to the final design specifications during the actual construction phase. [Rule 62-4.070(3), F.A.C.]
5. Project Completion: The permittee shall complete construction and commence operation of the new ESP before placing the SCR system in service. By May 1, 2005, the permittee shall complete construction, begin operating, and continue operating the SCR system whenever Unit 7 is online unless otherwise authorized by this permit. [Applicant Request; Design; Paragraph 1 of the Agreement]

PERFORMANCE REQUIREMENTS

{Permitting Note: This permit does not alter any specifications or limitations included in previous permits that define permitted capacities such as heat input rates, fuel consumption, or hours of operation. It does not authorize any additional fuels or such other methods of operation.}

EMISSIONS STANDARDS

{Permitting Note: Particulate matter emissions continue to be regulated by Rules 62-296.405(1)(b) and 62-210.700(3), F.A.C. in accordance with current Title V Permit Nos. C.7 and C.8.}

6. Stack Opacity: The flue gas opacity from Unit 7 shall not exceed 20% based on a 6-minute block average, except for one 6-minute block per hour that shall not exceed 27%. Compliance shall be determined by data collected from the certified continuous opacity monitor or EPA Method 9, which is incorporated by reference in Chapter 62-297, F.A.C. This standard is effective on the date of the initial compliance test for particulate matter and thereafter. *{Permitting Note: Stack opacity during soot blowing and load change continues to be regulated by Rule 62-210.700(3), F.A.C. in accordance with current Title V Permit Condition C.6. Excess emissions due to startup, shutdown, and malfunction continue to be regulated by Rule 62-210.700(1), (2), and (4), F.A.C. in accordance with current Title V permit Condition Nos. C.12, C.13, and C.14.}* [Design; Rule 62-4.070(3), F.A.C.]
7. Nitrogen Oxides (Interim): Prior to implementing the required NO_x control strategy for Units 4, 5, and 6, the NO_x emissions from Unit 7 shall not exceed 0.15 lb/MMBtu of heat input based on a 30-day rolling average when the SCR system is operational with a catalyst temperature of at least 600° F. The permittee shall demonstrate compliance with data collected from the certified CEMS. This standard is effective on the date the CEMS is re-certified in accordance with the acid rain provisions of 40 CFR 75. After the required NO_x control strategy is implemented for Units 4, 5, and 6, the plant-wide NO_x standard specified in Subsection 3B shall supersede this interim standard. [Design; Rules 62-4.070(3), F.A.C.]

SCR BYPASS OPERATION

8. SCR Bypass, Startup/Shutdown: During Unit 7 startup and shutdown, the SCR system may be bypassed in accordance with manufacturer's recommended procedures to allow for controlled catalyst heating and cooling. During startup, the SCR system shall be on line and functioning when the minimum operating temperature of the catalyst is achieved ($\geq 600^{\circ}$ F). During shutdown, the SCR system may be removed from service when the catalyst temperature drops below 600° F. [Design; Rule 62-210.700, F.A.C.]
9. SCR Bypass, Catalyst Maintenance and Repair: The permittee may bypass the SCR system to perform catalyst maintenance and repair for up to 15 days per year during the non-ozone season. During such allowable bypass periods, the uncontrolled NO_x emissions from Unit 7 shall not exceed 0.35 lb/MMBtu based on a 24-hour average. The daily NO_x emission rates for these periods may be excluded from the plant-wide 30-day NO_x standard specified in Subsection 3B. The permittee shall notify the Compliance Authority in advance of the purpose of the SCR bypass, the expected dates of SCR bypass, and the

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU 007 – Boiler No. 7

expected duration of SCR bypass. *{Permitting Note: The ozone season is defined as May 1st through September 15th.}* [Rules 62-210.700 and 62-4.070(3), F.A.C.]

EMISSIONS PERFORMANCE TESTING

10. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification shall include: the scheduled date, approximate start time, test team, contact name and phone number, description of unit to be tested, and the tests to be performed. [Rule 62-297.310(7)(a)9, F.A.C.]
11. Particulate Matter, Compliance Tests: Within 60 days after completing construction of the ESP and bringing Unit 7 on line, the permittee shall conduct tests to demonstrate compliance with the emissions standards for particulate matter and opacity. Tests for particulate matter shall be conducted in accordance with the methods and procedures currently specified in the Title V air operation permit. Subsequent tests shall be conducted during each federal fiscal year (October 1st to September 30th). The permittee shall demonstrate initial compliance with the opacity standard by submitting the data collected from the certified continuous opacity monitor for each particulate matter test run. [Rule 62-297.310(7), F.A.C.]
12. Nitrogen Oxides, Compliance Tests: Within 60 days after completing construction of the SCR system and bringing Unit 7 on line, the permittee shall conduct tests to demonstrate compliance with the design specification to achieve no less than an 85% reduction in the nitrogen oxide emission rate. The permittee shall concurrently test the SCR inlet and SCR outlet in accordance with EPA Method 7E as adopted by reference in Rule 62-204.800, F.A.C. Data collected during the annual NOx RATA testing may be used to represent NOx emissions at the SCR outlet. Alternatively, the permittee may submit data collected from the NOx rate process monitors at the SCR inlet and SCR outlet, which are part of the ammonia injection system. The data shall be collected for at least three consecutive hours. Subsequent tests shall be conducted during each federal fiscal year (October 1st to September 30th). [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]
13. Ammonia Slip, Performance Tests: Within 60 days after completing construction of the SCR system and bringing Unit 7 on line, the permittee shall conduct tests to determine the ammonia slip rate in accordance with EPA Method CTM-027 or other methods approved by EPA. Subsequent tests shall be conducted during each federal fiscal year. If tests show ammonia slip emissions are greater than the design target level specified in Condition No. 3 of this subsection, the permittee shall take corrective actions such as repair, addition of catalyst, replacement of catalyst, etc. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

{Permitting Note: EPA Methods 1 (Traverse Points), 2 (Velocity and Flow Rate), 3 (Gas Analysis), 4 (Moisture Content), and 19 (Calculating Emission Rates, Use of F-Factors) may also be used to supplement the required test methods.}

CONTINUOUS MONITORING REQUIREMENTS

{Permitting Note: In accordance with the federal Acid Rain requirements, the following continuous monitors are installed on these units: SO₂, NO_x, CO₂ and stack gas flow.}

14. COMS: The permittee shall install, calibrate, operate and maintain a continuous opacity monitoring system (COMS) to demonstrate compliance with the stack opacity standard. The COMS shall monitor and record data during all periods of Unit 7 operation including startup, shutdown, malfunction or emergency conditions, but not including continuous monitoring system breakdowns, repairs, or calibration checks. *{Permitting Note: The existing COMS required by the Acid Rain program satisfies this requirement.}* [Rule 62-4.070(3), F.A.C.]
15. NOx CEMS: To demonstrate compliance with the emissions standards, the permittee shall install,

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU 007 – Boiler No. 7

calibrate, operate and maintain a continuous emissions monitoring system (CEMS) to continuously monitor and record the emissions of nitrogen oxides and an appropriate diluent gas (carbon dioxide or oxygen). The CEMS shall monitor and record data during all periods of Unit 7 operation including startup, shutdown, malfunction or emergency conditions, but not including continuous monitoring system breakdowns, repairs, calibration checks, or zero and span adjustments. For each calendar quarter, monitor availability shall be 95% or greater. If unable to achieve this level, the permittee shall submit a report identifying the problems in achieving 95% monitor availability and a plan of corrective actions. The permittee shall implement the reported corrective actions within the next calendar quarter. *{Permitting Note: The existing NOx CEMS required by the Acid Rain program satisfies this requirement. Due to the substantial changes being made to the existing monitor as a result of this project, it will be necessary to re-certify the existing CEMS in accordance with the provisions of 40 CFR 75.}* [Rule 62-4.070(3), F.A.C.]

RECORDS AND REPORTS

16. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the provisions of Rule 62-297.310(8), F.A.C. For each required test run, the report shall indicate the actual heat input rate (MMBtu/hour), the NOx emission rate (lb/MMBtu) as recorded by the CEMS, and the ammonia injection rate (lb/hour). The report shall also include copies of the continuous monitoring records for opacity and NOx emissions. [Rule 62-297.310(8), F.A.C.]

17. Quarterly Report

a. *NOx Summary*: For each calendar day during the reporting quarter, the permittee shall report the following information related to the NOx CEMS for Unit 7:

- Hours of operation for Unit 7;
- Daily average NOx emission rate, lb/MMBtu;
- 30-day average NOx emission rate, lb/MMBtu; and
- Whether or not the day included a startup, shutdown, malfunction or bypass of the SCR.

Identify the “F” factor used for any calculations, the method of determination, and type of fuel combusted. For each day that CEMS data was not obtained for at least 18 hours of Unit 7 operation, provide a justification for not obtaining sufficient data and describe the corrective actions taken to prevent this in the future. Identify any emissions data excluded from the calculation of emission rates due to startup, shutdown, or malfunction.

b. *Opacity Summary*: For each calendar day during the reporting quarter, the permittee shall report each 6-minute period in excess of the opacity standard.

c. *Gas Sampling Grid (GSG)*: The permittee shall summarize any tests using the GSG that were conducted during the calendar quarter.

Each quarterly report is due within 30 days of the calendar quarter being reported.

[Rule 62-4.070(3), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

B. EUs 001 to 007 – Combined Conditions

This section of the permit addresses the following emissions units.

EU No.	Title V Emissions Unit Description
001	Boiler No. 1 (Phase II Acid Rain Unit)
002	Boiler No. 2 (Phase II Acid Rain Unit)
003	Boiler No. 3 (Phase II Acid Rain Unit)
004	Boiler No. 4 (Phase I and II Acid Rain Unit)
005	Boiler No. 5 (Phase I and II Acid Rain Unit)
006	Boiler No. 6 (Phase I Acid Rain Unit)
007	Boiler No. 7 (Phase I Acid Rain Unit)

{Permitting Note: August 28, 2002, Gulf Power Company and the Florida Department of Environmental Protection entered into an agreement titled, "Agreement for the Purpose of Ensuring Compliance with the Ozone Ambient Air Quality Standards". This agreement is the basis for the following permit conditions.}

REQUIREMENTS OF THE AGREEMENT

- Supplemental Conditions:** The conditions of this section supplement all other valid air construction and operation permits for these units. These conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070(3), F.A.C.]
- Plant-Wide NOx Limit:** Emissions of nitrogen oxides (NOx) from the combined operation of Units 4, 5, 6, and 7 shall not exceed 0.2 lb/MMBtu heat input based on a 30-day rolling average except for periods when Unit 7 is shutdown. The plant-wide daily NOx emission rate shall be determined by the following equation:

$$\text{Plant-Wide Daily MMBtu-Weighted NOx Emission Rate} = \frac{\sum_{\text{Units 4, 5, 6, 7}} [(\text{Unit \# daily MMBtu}) \times (\text{Unit \# daily NOx CEMS Rate})]}{\sum_{\text{Units 4, 5, 6, 7}} (\text{Unit \# daily MMBtu})}$$

The "Unit # daily MMBtu" shall be determined by the daily as-burned fuel analysis and the fuel fired for each unit. The "Unit # daily NOx CEMS Rate" shall be determined by the daily average of NOx CEMS data for each unit and reported in terms of "lb/MMBtu heat input". The plant-wide daily NOx emissions rate shall be determined each day regardless of the operating status for Unit 7. The plant-wide 30-day rolling NOx average shall be determined for each 30 sequential Unit 7 operating days, which need not be consecutive. A Unit 7 operating day means any calendar day that Unit 7 operates a minimum of 18 hours. The Unit 7 daily NOx CEMS rate may consist of less than 18 hours of data if this is due to CEMS malfunction or invalid CEMS data. When the catalyst temperature is below 600° F during a startup or shutdown, NOx emissions data collected during such periods may be excluded from the daily NOx average. In accordance with Condition No. 9 of Subsection 3A, NOx emissions data collected during SCR bypass during the non-ozone season may be excluded from the daily NOx average. The plant-wide NOx emission standard shall be achieved by utilizing the SCR system for Unit 7 and implementing the selected NOx control strategy for Units 4, 5, and 6. The effective date for the plant-wide NOx emission standard is:

- The startup date of the selected additional NOx reduction project, (excluding an SCR project for Unit 6), but no later than May 1, 2006; or
- The startup date of the SCR project for Unit 6, but no later than December 31, 2007.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

B. EUs 001 to 007 – Combined Conditions

For purposes of this condition, “startup date” shall mean the date that the permittee demonstrates initial compliance with the terms of the required air construction permit (or other Department approval) that authorized implementation of the additional NOx reduction project. [Paragraphs 2, 3 and Exhibit B of the Agreement]

3. NOx CEMS: To demonstrate compliance with the plant-wide NOx emissions standard, the permittee shall install, calibrate, operate and maintain continuous emissions monitoring systems (CEMS) to continuously monitor and record the emissions of nitrogen oxides and an appropriate diluent gas (carbon dioxide or oxygen) from Units 4, 5, 6, and 7. {Permitting Note: The existing NOx CEMS required by the Acid Rain program satisfy this requirement.} [Exhibit B of the Agreement]
4. Quarterly Report: For each calendar day during the reporting quarter, the permittee shall report the following information related to the NOx CEMS for Unit 7:
 - Daily NOx emission rate for each boiler, lb/MMBtu;
 - Daily heat input rate for each boiler, MMBtu/day;
 - 30-day plant-wide NOx emissions rate, lb/MMBtu;
 - Identify whether Unit 7 operated less than 18 hours;
 - Identify the occurrence of a Unit 7 startup or shutdown; and
 - Identify operation of Unit 7 with SCR bypass for catalyst maintenance or repair and the duration of bypass (hours).

Identify the “F” factor used for any calculations, the method of determination, and type of fuel combusted. For each day that CEMS data was not obtained for at least 18 hours of Unit 7 operation, provide a justification for not obtaining sufficient data and describe the corrective actions taken to prevent this in the future. Identify any emissions data excluded from the calculation of emission rates due to startup, shutdown, or malfunction.

{Permitting Notes: To achieve the plant-wide NOx standard for the Crist Plant, Gulf Power Company will take the following additional actions:

Unit Retirements: The Agreement requires the retirement of Unit 1 within 120 days of receiving a final order from the Public Service Commission that authorizes the recovery of costs associated with the pollution control equipment incurred pursuant to the Agreement though the Environmental Cost Recovery Clause. A final order is one that is no longer subject to review or appeal by a court of competent jurisdiction. The Agreement also requires the retirement of Units 2 and 3 on or before May 1, 2006. [Paragraph 4 of the Agreement]

Additional NOx Reduction Projects: The Agreement requires Gulf Power Company to conduct a variety of engineering studies to determine the feasibility of NOx reduction technologies for one or more of the three remaining coal-fired units (Units 4, 5, and 6). The studies and related unit-specific demonstration projects may include (but are not limited to) SCR, selective non-catalytic reduction (SNCR) technology, over-fired air (OFA) technology, natural gas re-burn technology, selective use of biomass fuel, etc. The studies must be complete by May 1, 2005. Before implementing any NOx reduction technology or combination of technologies, Gulf Power Company must obtain written concurrence from the Department that the use thereof is reasonable and necessary to achieve the overall plant-wide NOx emission standard. If a NOx reduction technology or a combination of technologies other than an SCR project for Unit 6 is identified as appropriate, Gulf Power Company will implement the technology or combination of technologies on one or more of the three remaining coal-fired units by May 1, 2006. If an SCR project for Unit 6 is identified as the appropriate NOx reduction technology, Gulf Power Company will implement, begin and continue operating the SCR system by December 31, 2007. [Paragraph 2 of the Agreement]}

SECTION 4. APPENDICES
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Appendix CF. Citation Format
Appendix GC. General Conditions
Appendix SC. Standard Conditions

SECTION 4. APPENDIX CF
CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Air 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
“001” identifies the specific permit project
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to 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

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

Agreement

On August 28, 2002, Gulf Power Company and the Florida Department of Environmental Protection entered into an agreement titled, “Agreement for the Purpose of Ensuring Compliance with the Ozone Ambient Air Quality Standards”. Throughout the permit, this is cited as the “Agreement”.

SECTION 4. APPENDIX GC
GENERAL CONDITIONS

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

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

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

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

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

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

SECTION 4. APPENDIX GC
GENERAL CONDITIONS

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable 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 or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX SC
STANDARD CONDITIONS

{Permitting Note: Unless otherwise specified by permit or rule, the following conditions apply to all emissions units and activities at this 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 62-4.130, 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 Allowed:** Unless otherwise specified in the permit, excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. **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.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program 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.]
6. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
7. **General Visible Emissions:** Unless otherwise specified in the permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. [Rule 62-296.320(4)(b)1, F.A.C.]
8. **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.]

TESTING REQUIREMENTS

9. **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.]
10. **Operating Rate During Testing:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted

SECTION 4. APPENDIX SC
STANDARD CONDITIONS

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. [Rule 62-297.310(2), F.A.C.]

11. 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.]
12. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. *Required Sampling Time*. 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. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - 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.
 - 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.

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

13. 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.]

14. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
15. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
16. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
17. Test Reports: 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. 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. 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:

SECTION 4. APPENDIX SC
STANDARD CONDITIONS.

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 are 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 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.]


RECORDS AND REPORTS


18. 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 five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
19. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

Memorandum

Florida Department of Environmental Protection

TO: Howard Rhodes, DARM

THROUGH: Trina Vielhauer, BAR 
Al Linero, NSR

FROM: Jeff Koerner, NSR 

DATE: March 3, 2003

SUBJECT: Final Air Construction Permit No. 0330045-005-AC
Gulf Power Company, Crist Electrical Generating Plant
Unit 7 ESP/SCR Pollution Control Project

The Final Permit for this project is attached for your approval and signature. This permit authorizes the replacement of the existing electrostatic precipitator and the installation of a new selective catalytic reduction system for Unit 7 at the existing Crist Electric Generating Plant in Pensacola, Florida. The Department contemplated these air pollution control devices in an August 2002 agreement with Gulf Power Company titled, "Agreement for the Purpose of Ensuring Compliance with the Ozone Ambient Air Quality Standards". In accordance with Rule 62-212.400(2)(a)2, F.A.C. and EPA's definition of "modification" in 40 CFR 52.21(b)(2)(iii)(h), the pollution control project is exempt from PSD preconstruction review. The project proposes to reduce NOx emissions by approximately 5000 tons per year.

The Department distributed an "Intent to Issue Permit" package on February 14, 2003. The applicant published the "Public Notice of Intent to Issue" in the Pensacola News Journal on February 16, 2003. The Department received the proof of publication on February 25, 2003. No comments on the draft permit were received.

Day #90 is June 3, 2003. I recommend your approval of the attached Final Permit for this project.

Attachments

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111



Certified Mail

February 21, 2003

Mr. Jeffrey F. Koerner
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

RECEIVED

FEB 25 2003

BUREAU OF AIR REGULATION

Dear Mr. Koerner:

RE: CRIST ELECTRIC GENERATION FACILITY
DEP File No. 0330045-005-AC
Air Construction Permit for ESP/SCR- Public Notice Affidavit

Thanks for the quick response to Gulf Power's request for an air construction permit to begin construction of the ESP and SCR at Plant Crist. Enclosed is the proof of publication, i.e., newspaper affidavit regarding the Public Notice of Intent to Issue An Air Construction Permit originally sent to Gene L. Ussery (Gulf Power) on February 14, 2003.

Please let me know if you have any questions regarding this matter and if you receive any public comments regarding our request.

Sincerely,

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

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

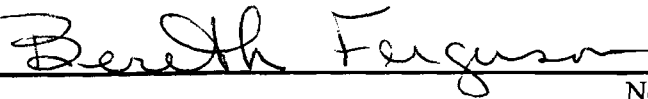
Cc: J. O. Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Sandra Veazey, FDEP, Northwest District

Published Daily-Pensacola, Escambia County, FL

STATE OF FLORIDA
County of Escambia

Before the undersigned authority personally appeared Kay Chastain who is personally known to me and who on oath says that he/she is a representative of The Pensacola News Journal, a daily newspaper published in Pensacola in Escambia County, Florida; that the attached copy of advertisement, being a legal in the matter of **PUBLIC NOTICE OF INTENT** was published in said newspaper in the issues of **FEBRUARY 16, 2003**. Affiant further states that the said Pensacola News Journal is a newspaper published in Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida each day and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and Affiant further says that he/she has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this **18TH DAY OF FEBRUARY**
A.D., 2003.



Notary Public

BERETH FERGUSON
"Notary Public-State of FL."
My Comm. Expires OCT. 10, 2005
Comm. No. DD048862

RECEIVED

FEB 25 2003

BUREAU OF AIR REGULATION

**PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT
STATE OF FLORIDA**

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Permit No. 0330045-005-AC

Gulf Power Company

Crist Electrical Generating Plant

Unit 7 ESP/SCR Pollution Control Project

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Gulf Power Company to replace the existing electrostatic precipitator (ESP) and install a new selective catalytic reduction (SCR) system for Unit 7. The new equipment will be installed at the existing Crist Electrical Generating Plant, which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida. The applicant's authorized representative is Gene L. Ussery, Jr., V.P. of Power Generation. The applicant's mailing address is Gulf Power Company, One Energy Place, Pensacola, FL 32520-0328.

In August of 2002, Gulf Power Company and the Florida Department of Environmental Protection entered into an agreement titled, "Agreement for the Purpose of Ensuring Compliance with the Ozone Ambient Air Quality Standards". The application under review is based on the pollution control projects for Unit 7 discussed in this agreement. Gulf Power Company proposes to install a new selective catalytic reduction (SCR) to remove emissions of nitrogen oxides (NOx) from Unit 7 at the existing Crist Electrical Generating Plant. Designed for 85% NOx removal efficiency, the SCR system is expected to reduce actual emissions of nitrogen oxides by approximately 5000 tons per year. To control particulate matter emissions, Gulf Power Company proposes to replace the existing electrostatic precipitator (ESP) with a new ESP. The new ESP is needed to structurally accommodate the proposed SCR system. Emissions of other pollutants are not expected to change. As a pollution control project defined by the regulations, the project is exempt from the PSD preconstruction review requirements of Rule 62-212.400, F.A.C. In accordance with the specific conditions, the draft permit authorizes the construction of this pollution control equipment.

The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedure results in a different decision or significant change of terms or conditions. The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (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 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 Department'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 how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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 Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

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

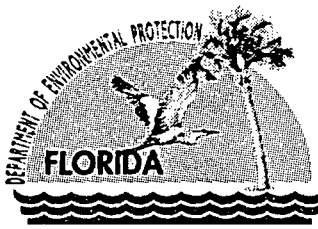
A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
(111 S. Magnolia Drive, Suite 4)
2600 Blair Stone Road, MS #5505
Tallahassee, Florida, 32399-2400
Telephone: 850/488-0114

Department of Environmental Protection
Northwest District Office
Air Resources Section
160 Governmental Center
Pensacola, FL 32501-5794
Telephone: 850/595-8300

The complete project file includes the application, Technical Evaluation and Preliminary Determination, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Department's reviewing engineer for this project for additional information at the address and phone numbers listed above.

Legal# 64616 1T February 16, 2003.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

February 14, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Gene L. Ussery, Jr., V.P. of Power Generation
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0328

Re: Draft Air Permit No. 0330045-005-AC
Gulf Power Company, Crist Electrical Generating Plant
Unit 7 ESP/SCR Pollution Control Project

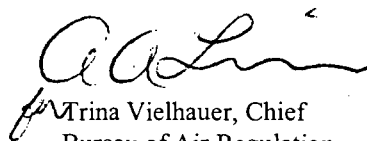
Dear Mr. Ussery:

Enclosed is one copy of the draft permit to replace the existing electrostatic precipitator and install a new selective catalytic reduction system for Unit 7. The new equipment will be installed at the existing Crist Electrical Generating Plant, which is located on Governors Bayou off of 10 Mile Road in Pensacola, Escambia County, Florida. The Department's "Technical Evaluation and Preliminary Determination", "Intent to Issue Permit", and the "Public Notice of Intent to Issue Permit" are also included.

The "Public Notice of Intent to Issue Permit" must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit. The Department will accept comments on the draft permit for a period of 14 days as described in the attached notice.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, Administrator of the New Source Review Section, at the above letterhead address. If you have any other questions, please contact Jeff Koerner at 850/921-9536.

Sincerely,



Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

"More Protection, Less Process"

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Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To: Gene L. Ussery, Jr.
 Street, Apt. No., or PO Box: One Energy Place
 City, State, ZIP+4: Pensacola, FL 32520-0328

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

In the Matter of an
Application for Air Permit by:

Gulf Power Company
One Energy Place
Pensacola, FL 32520-0328

Authorized Representative:

Gene L. Ussery, Jr., V.P. of Power Generation

Draft Permit No. 0330045-005-AC
Gulf Power Company
Crist Electric Generating Plant
Unit 7 ESP/SCR Project
Escambia County, Florida

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of Draft Permit attached) for the proposed project as detailed in the application and the enclosed Technical Evaluation and Preliminary Determination, for the reasons stated below. Gulf Power Company applied on December 26, 2002 to the Department for a permit to replace the existing electrostatic precipitator and install a new selective catalytic reduction system for Unit 7. The new equipment will be installed at the existing Crist Electrical Generating Plant, which is located on Governors Bayou off of 10 Mile Road in Pensacola, Escambia County, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-210, and 62-212, F.A.C. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required to perform proposed work. The Department intends to issue this air construction permit based on the belief that the applicant has provided reasonable assurances to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting 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 Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in Section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) and (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of Public Notice of Intent to Issue Air Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S. however, any person who asked the Department for notice of agency action may file a petition within fourteen (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 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 Department'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 how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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 Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

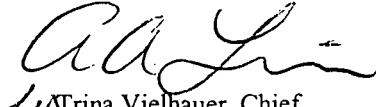
In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Mediation is not available in this proceeding. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

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 Intent to Issue Air Construction Permit package (including the Public Notice of Intent to Issue Air Construction Permit, Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 2/14/03 to the persons listed:

Mr. Gene L. Ussery, Gulf Power Co.*
Mr. G. Dwain Waters, Gulf Power Co.
Mr. Gregory N. Terry, Gulf Power Co.
Ms. Sandra Veazey, NWD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Victoria Gibson / *February 14, 2003*

(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Permit No. 0330045-005-AC

Gulf Power Company
Crist Electrical Generating Plant
Unit 7 ESP/SCR Pollution Control Project

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Gulf Power Company to replace the existing electrostatic precipitator (ESP) and install a new selective catalytic reduction (SCR) system for Unit 7. The new equipment will be installed at the existing Crist Electrical Generating Plant, which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida. The applicant's authorized representative is Gene L. Ussery, Jr., V.P. of Power Generation. The applicant's mailing address is Gulf Power Company, One Energy Place, Pensacola, FL 32520-0328.

In August of 2002, Gulf Power Company and the Florida Department of Environmental Protection entered into an agreement titled, "Agreement for the Purpose of Ensuring Compliance with the Ozone Ambient Air Quality Standards". The application under review is based on the pollution control projects for Unit 7 discussed in this agreement. Gulf Power Company proposes to install a new selective catalytic reduction (SCR) to remove emissions of nitrogen oxides (NOx) from Unit 7 at the existing Crist Electrical Generating Plant. Designed for 85% NOx removal efficiency, the SCR system is expected to reduce actual emissions of nitrogen oxides by approximately 5000 tons per year. To control particulate matter emissions, Gulf Power Company proposes to replace the existing electrostatic precipitator (ESP) with a new ESP. The new ESP is needed to structurally accommodate the proposed SCR system. Emissions of other pollutants are not expected to change. As a pollution control project defined by the regulations, the project is exempt from the PSD preconstruction review requirements of Rule 62-212.400, F.A.C. In accordance with the specific conditions, the draft permit authorizes the construction of this pollution control equipment.

The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedure results in a different decision or significant change of terms or conditions. The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (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 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 Department'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

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

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 how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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 Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
(111 S. Magnolia Drive, Suite 4)
2600 Blair Stone Road, MS #5505
Tallahassee, Florida, 32399-2400
Telephone: 850/488-0114

Department of Environmental Protection
Northwest District Office
Air Resources Section
160 Governmental Center
Pensacola, FL 32501-5794
Telephone: 850/595-8300

The complete project file includes the application, Technical Evaluation and Preliminary Determination, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Department's reviewing engineer for this project for additional information at the address and phone numbers listed above.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

Draft Air Construction Permit No. 0330045-005-AC
Crist Unit 7 ESP/SCR Project

COUNTY

Escambia County

APPLICANT

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

**PERMITTING
AUTHORITY**

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section



February 13, 2003

{Filename: Crist 7 ESP-SCR TEPD.doc}

1. GENERAL PROJECT INFORMATION

Applicant Name and Address

Gulf Power Company – Crist Electric Generating Plant
One Energy Place
Pensacola, FL 32520-0328

Authorized Representative:

Gene L. Ussery, Jr., V.P. of Power Generation

Processing Schedule

12/26/02 Received the application for a pollution control project;
01/22/03 Department requested additional information;
02/06/03 Department received additional information; and
02/10/03 Department received certification of authorized representative and professional engineer; complete.

{Note: The applicant submitted some initial information related to the ESP and SCR systems identified as "Attachment 2" and requested that it be handled as confidential information pursuant to Section 403.111(1), F.S. The Department returned this information to the applicant without making any decisions based on it. Instead, the Department asked specific questions about the control equipment and received a detailed response from Gulf Power Company, which made the application complete. The Department currently holds no "confidential information" for this project and did not rely on such information to make its determination.}

Facility Description and Location

Gulf Power Company operates the existing Crist Power Plant, which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida. This site is in an area that is currently in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS).

Standard Industrial Classification Code (SIC)

SIC No. 4911 – Electrical Services

Regulatory Categories

Title III: The existing facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The existing facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

Project Description

On August 28, 2002, Gulf Power Company and the Florida Department of Environmental Protection entered into an agreement titled, "Agreement for the Purpose of Ensuring Compliance with the Ozone Ambient Air Quality Standards" (Agreement). The purpose of the agreement is to support continuing efforts to maintain compliance with the ambient air quality standard for ozone in the Escambia County area. In brief, Gulf Power Company agrees to:

- Construct and operate a new electrostatic precipitator (ESP) for Crist Unit 7;
- Construct and operate a new selective catalytic reduction (SCR) system for Crist Unit 7;
- Ultimately retire Crist coal-fired Units 1, 2, and 3; and
- Employ additional NOx reduction techniques for one or more of the remaining coal-fired Units 4, 5, and 6.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The agreement is contingent on approval from the Public Service Commission to recover costs from the ratepayers related to the pollution control projects, which became final November 18, 2002. Based on the agreement, Gulf Power Company submitted an application for an air permit to install the new ESP and SCR for Crist Unit 7. The project will be constructed in the following general phases over the next several years:

- Phase 1 consists of the planning and construction of infrastructure support facilities such as: the addition of new parking lots, the demolition and relocation of the maintenance shop, the creation of construction lay-down areas, and crane erection for the project. This phase also includes beginning the process of obtaining the necessary local, state, and federal permits and licenses.
- Phase 2 consists of the installation of pilings and foundations for the ESP and SCR, which includes excavations into the existing coal storage pile located east of the plant. Foundation testing began on February 3, 2003.
- Phase 3 is the erection of the ESP and the ductwork support steel, which is scheduled for April of 2003. Startup of the ESP is planned for May of 2004.
- Phase 4 is the construction of the SCR system and the ductwork support steel, which is scheduled for September of 2003. Startup of the SCR system is planned for May of 2005.

2. APPLICABLE REGULATIONS

State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). In general, this project is subject to the applicable rules and regulations defined in the following Chapters of the F.A.C.

<u>Chapter</u>	<u>Description</u>
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements and Federal Regulations Adopted by Reference
62-210	Required Permits, Public Notice, Reports, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review
62-213	Operation Permits for Major Sources of Air Pollution
62-296	Emission Limiting Standards
62-297	Testing, Continuous Monitoring, and Alternate Sampling Procedures

{Note: The project is not subject to Florida's Power Plant Siting Act because there will be no change in steam-generated electrical capacity.}

General PSD Applicability

The Department regulates major air pollution sources in accordance with the Prevention of Significant Deterioration (PSD) program, as delegated by the EPA for electric utilities. A PSD review is required only in areas currently in attainment with the National Ambient Air Quality Standard (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant, or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories (Table 62-212.400-1, F.A.C.), or
- 5 tons per year of lead.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

For new projects at PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates listed in Table 62-212.400-2, F.A.C. Pollutant emissions from the project exceeding these rates are considered “significant”. The applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility may be “major” with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

PSD Applicability for Project

The Department’s Rule 62-212.400(2)(a)2, F.A.C. exempts certain pollution control projects from the requirements of PSD review. Subparagraph “a” of this rule states that, “A pollution control project that is being added, replaced, or used at an existing electric utility steam generating unit and that meets the requirements of 40 CFR 52.21(b)(2)(iii)(h), adopted and incorporated by reference at Rule 62-204.800, F.A.C., shall not be subject to the preconstruction review requirements of this rule.” This federal rule defines a “major modification” as any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act. However, it also specifically states that a physical change or change in the method of operation shall not include the addition, replacement or use of a pollution control project at an existing electric utility steam generating unit, unless it is determined that such addition, replacement, or use renders the unit less environmentally beneficial, or except:

1. There is reason to believe that the pollution control project would result in a significant net increase in representative actual annual emissions of any criteria pollutant over levels used for that source in the most recent air quality impact analysis in the area conducted for the purpose of Title I, if any, and
2. It is determined that the increase will cause or contribute to a violation of any national ambient air quality standard or PSD increment, or visibility limitation.

The replacement of the ESP and the addition of the SCR system are not expected to result in any increased emissions. The purpose of the project is to reduce nitrogen oxide emissions. The following table summarizes past actual emissions and the project impacts.

Table 2A. Estimated Emissions

Pollutant	Emissions, Ton Per Year ^a				
	2000	2001	2-Year Avg.	Post-Project	Difference
CO	309	236	273	No Change ^b	0
NOx	6915	4971	5943	891 ^c	- 5052
Pb	0.22	0.17	0.20	No Change ^d	0
PM	307	246	277	No Change ^d	0
PM10	192	154	173	No Change ^d	0
SO ₂	24,470	17,462	20,966	No Change ^b	0
VOC	37	28	33	No Change ^b	0

Notes

- a. Annual emissions are based on data compiled from the applicant’s Annual Operating Reports as recorded in the Department’s ARMS database.
- b. The ESP and SCR projects are not expected to affect emissions of carbon monoxide, sulfur dioxide, or volatile organic compounds.
- c. Based on the Agreement, the SCR project is designed for a NOx reduction from Unit 7 of 85%.

- d. The new ESP is expected to be more efficient than the previous ESP, which would result in a reduction of particulate matter emissions.

The replacement of the ESP and the addition of the SCR system are considered a pollution control project. During the period of 1997 to 2001, Unit 7 averaged about 6900 hours per year. The annual capacity factor for Unit 7 during this period approached 50% based on the actual annual heat input versus the maximum potential annual heat input rate.^[1] Therefore, the addition of the pollution control equipment is not expected to result in an increase in the capacity utilization of Unit 7 and uncontrolled representative actual emissions are not expected to be any different than past actual emissions. At a control efficiency of 85% for the proposed SCR system, actual representative controlled NOx emissions are expected to decrease by approximately 5000 tons per year. The Department believes that the proposed pollution control project will be environmentally beneficial and will not result in a significant net increase in representative actual annual emissions of any criteria pollutant. As such, this project is exempt from the requirements of PSD preconstruction review. Nevertheless, an air construction permit is required to conduct the proposed work.

3. APPLICATION REVIEW

Crist Unit 7 (ARMS Emissions Unit 007) is a 578 MW Foster Wheeler balanced draft, front and rear wall-fired, dry bottom boiler. The maximum heat input rate is 6406 MMBtu per hour while combusting the primary fuels of pulverized bituminous coal and/or natural gas. Distillate oil and on-specification used oil fuel are also combusted as a secondary fuels. Emissions of particulate matter are currently reduced by a Buell cold side electrostatic precipitator. Nitrogen oxides are controlled with low NOx burners. Unit 7 has continuous monitors for opacity, stack gas flow, carbon dioxide, nitrogen oxides, and sulfur dioxide. Units 6 and 7 share a common stack that is 23.2 feet in diameter and 450 feet high. Based on the current Title V air operation permit, Unit 7 is subject to Rule 62-296.405, F.A.C. (Fossil Fuel Fired Steam Generators > 250 MMBtu/Hour Heat Input), predates the requirements of Rule 62-212.400, F.A.C. (PSD Preconstruction Review), and is regulated under Phase I of the federal Acid Rain Program. The applicant proposes to perform the following work.

Boiler Parameters

As a direct result of the pollution control project, the following boiler components will be modified: the economizer control damper, the economizer hopper, the air preheater and the air preheater inlet. The modifications are necessary to accommodate the new pollution control equipment and duct work. The proposed changes will not increase emissions nor add to the capacity of Unit 7. The materials of construction should be carefully selected to inhibit corrosion.

Electrostatic Precipitator (ESP)

Proposal

Particulate matter emissions in the exhaust flue gas of Unit 7 are currently controlled with a Buell cold-side ESP, which generally functions as follows. Particles in the flue gas are electrically charged by discharge electrodes. The negatively charged particles migrate to a grounded collection electrode. Periodically, the collecting plates are mechanically rapped to free captured particles, which fall in large sheets to collection hoppers below for removal. An automated control system adjusts electrical field strength and rapping frequency to provide optimum removal efficiency and prevent opacity spikes that can occur when collected particles are re-entrained into the exhaust flue gas. Cold-side ESPs have been used for over 70 years to remove particulate matter from boiler exhaust streams.

Gulf Power Company proposes to replace the existing ESP with a cold-side ESP manufactured by Alstom Power Inc. A cold-side ESP is installed after the air preheater and typically operates at flue gas temperatures of less than 400° F. The low temperature results in reduced flow rates, which means a smaller overall ESP and reduced costs. Cold-side ESPs can experience fly ash collection problems when firing low sulfur coals, which is not the case for the existing boiler. Gulf Power Company expects to tie into existing Unit 7 during a scheduled outage in the spring of 2004. The majority of construction will be completed prior to this outage.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Based on the preliminary design, the new ESP will consist of two casings or gas tight chambers. Each casing will have three cells with five fields per cell. The precipitator will have 30 total fields (electrical bus sections) with each field having approximate overall dimensions of 29 feet wide by 12 feet deep with a height of about 49 feet. The collecting plates will be 16-gage steel with a spacing of 15.75 inches. The discharge electrodes will be rigid. Each of the 30 electrical bus sections will be controlled by a microprocessor-based controller with field energizing optimization and high-speed field bus communication. The ESP will also be equipped with a data management system for remote control and communications with the high voltage power supplies and rapping control systems.

Design Specifications

The following specifications summarize the preliminary design of the proposed new ESP.

- *Collection Efficiency*: The proposed ESP is designed for a collection efficiency of 99.64%, a maximum controlled particulate emission rate of 0.05 lb/MMBtu, and a maximum stack opacity of 10%.
- *Specific Collection Area (SCA)*: The specific collection area is the ratio of the total collection surface area to the flue gas exhaust rate and is a rough indicator of the overall efficiency. The preliminary design has a total collection plate area of 767,326 ft² based on a volumetric flow rate of about 2,167,106 ft³/minute. For the proposed project, the SCA is estimated as follows:

$$SCA = (767,326 \text{ ft}^2) / (2,167,106 \text{ ft}^3/\text{minute}) = 0.354 \text{ min/ft}, \text{ or } 354 \text{ ft}^2 \text{ per } 1000 \text{ ft}^3/\text{minute}$$

This falls within the optimum SCA range for fly ash precipitators (200 to 400 ft² per 1000 ft³/minute).^[5]

- *Aspect Ratio (L/H)*: The aspect ratio is ratio of the effective length of the ESP over the effective height of the ESP. If the aspect ratio is small (< 1.0), then there is a greater chance that particulate matter will be re-entrained during periods of rapping and carried out of the ESP before reaching the hoppers. For the proposed ESP design, a rough estimate of the aspect ratio is:

$$\text{Aspect Ratio (L/H)} = (5 \text{ fields}) (12 \text{ ft length/field}) / (49 \text{ ft high}) = 1.22$$

This falls within the expected range of aspect ratios (1.0 to 1.5) for an ESP with a high collection efficiency for (> 99%).^[5]

- *Particle Migration Velocity (w)*: Particle migration velocity represents the *collectability* of a particle based on the design of a specific ESP. The critical design parameter for an ESP is the collection efficiency, which is a function of the plate collection area, the volumetric flow rate, and the particle migration velocity. The following simplified equation shows the general relationship of these parameters.^[5]

$$Ac = - Q / w [\ln (1 - n)], \text{ where:}$$

Ac is the plate collection area, ft²

Q is the volumetric flow rate, ft³/min

w is the particle migration velocity, ft/sec

n is the collection efficiency, (decimal form)

In addition to a particle collection efficiency of 99.64%, the preliminary design has a total collection plate area of 767,326 ft² based on a volumetric flow rate of about 2,167,106 ft³/minute. Based on the above equation and the preliminary design, a rough estimate of the particle migration velocity is:

$$w = - (2,167,106 \text{ ft}^3/\text{min}) / (767,326 \text{ ft}^2) [\ln (1 - 0.9964)] (\text{min}/60 \text{ sec}) = 0.26 \text{ ft/sec}$$

This falls within the expected range of particle migration velocities (0.1 – 0.5 ft/sec) for fly ash precipitators.^[2, 5]

- *Plate Area / Electrical Transformer-Rectifier (T-R) Set*: In most cases, a larger number of electrical bus sections (T-R sets) means a higher probability of continually achieving the designed collection efficiency. A general rule-of-thumb is to have one T-R set for every 10,000 to 30,000 ft² of collection plate area. Given

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

that the preliminary design has a total collection plate area of 767,326 ft² and 30 T-R sets, this ratio would be:

$$\text{ft}^2 / \text{T-R set} = (767,326 \text{ ft}^2) / (30 \text{ T-R sets}) = 25,600 \text{ ft}^2 / \text{T-R set}$$

This value falls within the optimum range for fly ash precipitators.^[2, 5]

Flue Gas Conditioning

Currently, sulfur is burned to condition the boiler exhaust flue gas. The added sulfur compounds lower the fly ash resistivity and improve the removal performance of the existing ESP. The new ESP will not require any flue gas conditioning and the existing sulfur burner will be removed.

Fly Ash Handling

A tumbling hammer rapping system will be used to remove captured fly ash from collecting plates. The maximum rapping density will be about 1163 square feet of collecting electrode per rapper. The preliminary design uses the existing control system to adjust the cleaning cycle and frequency that will minimize opacity spikes due to re-entrainment. Sixty hoppers (two per field) will hold the collected ash. The new ash collection hoppers will be tied in to the existing dry fly ash removal system. Since ash collection will be similar to the existing ESP, no significant changes in capacity are expected. As necessary, modifications will be made to extend the transport piping and increase the transport performance. New ductwork will be added to some of the air preheater outlet hoppers. New ash collection hoppers will be added at the bottom of the SCR inlet when it is installed. On-going engineering evaluations will determine whether additional minor changes will be needed for removal of the ash from these new hoppers that may change or add to the ash collection system.

Soot Blowing

The project is not expected to result in any changes to current boiler or air preheater soot blowing methods, frequency, or duration or add to the ash collection system.

Conclusion

The new ESP is being designed for a wide range of coals with varying ash contents. The design company, Alstom Power Inc., is a well-known engineering design and equipment manufacturer specializing in the power generation industry. They offer services ranging from design, consultation, fabrication, installation, and project management to complete turnkey projects. Design services include fabric filters (FF), flue gas desulfurization (FGD), electrostatic precipitator (ESP), post-combustion DeNOx (SCR), and ammonia-free DeNOx for gas turbines (SCONOx™). With over 70 years of experience in environmental control, Alstom Power Inc. has become a leading supplier of ESPs during the last 20 years. The preliminary design specifications for this project appear to fall within the typical design values of fly ash precipitators.

Particulate matter emissions continue to be regulated by Rules 62-296.405(1)(b) and 62-210.700(3), F.A.C. in accordance with current Title V Permit Nos. C.7 and C.8. To reflect a minimum level of control for the new ESP, the Department will include the following permit condition:

Stack Opacity: The flue gas opacity from Unit 7 shall not exceed 20% based on a 6-minute block average, except for one 6-minute block per hour that shall not exceed 27%.

This standard will apply for routine operation of Boiler No. 7 with a properly functioning ESP.

Selective Catalytic Reduction (SCR)

Unit 7 currently uses low NOx burners to inhibit the formation of NOx. Gulf Power Company proposes to add a new SCR system manufactured by Southern Company Services, Inc. SCR is an add-on control technology in which ammonia is injected into the exhaust gas stream before a section of catalyst. The ammonia combines with NOx in the presence of the catalyst in a reduction reaction to form nitrogen and water. For conventional catalysts such as vanadium pentoxide, the exhaust gas temperature must be maintained between 450° F and 850° F for the reaction to proceed satisfactorily. Ammonia that escapes past the catalyst without reacting with NOx is

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called “ammonia slip”. If a fuel contains significant amounts of sulfur, high levels of ammonia slip can lead to the formation of bisulfates and other particulate matter, which can foul the catalyst and reduce heat transfer rates. To avoid these problems, SCR systems can be designed with very low levels of ammonia slip (< 5 ppmv) while still achieving control efficiencies greater than 90%. SCR is a commercially available, demonstrated control technology currently employed on numerous utility boilers and combined cycle gas turbine projects worldwide.

Design Specifications

The following specifications summarize the preliminary design of the proposed new SCR system.

- *Basic Design Specifications:* The SCR system is designed for a NOx conversion efficiency of 90% based on an inlet NOx emissions rate of 0.70 lb/MMBtu.
- *Catalyst Design Specifications:* The catalyst will consist of titanium dioxide and molybdenum oxide with vanadium pentoxide as the active component. The catalyst is fabricated by applying ceramic catalyst material to a perforated stainless steel mesh grid plate. The catalyst will be arranged in a plate-type structure with 5.7 mm pitch arranged in four layers. The operational temperature range is approximately 600° to 800° F. The initial configuration is for a catalyst volume of approximately 26,000 cubic feet in 2½ layers. With all four potential layers in place, the catalyst volume will be approximately 41,600 cubic feet.
- *Ammonia Storage and Mixing:* Anhydrous ammonia will be delivered by truck (or possibly rail) and stored on site in two 20,500 gallons tanks. Ammonia is diluted with air (< 10% by volume) and injected into the SCR inlet duct through the ammonia injection grid (AIG), which is divided into about two dozen zones. Each zone is equipped with a flow indicator and manual control valve for tuning the AIG to match the inlet NOx profile. Effective ammonia distribution and NOx conversion are dependent on the velocity profile entering the AIG. A static mixer installed upstream of the AIG creates flow resistance, flattens the velocity profile, and provides uniform gas flow. Downstream of the AIG, a second static mixer is positioned at the AIG injection points to impart a swirl to the diluted ammonia and promote good mixing with the flue gas. For 90% NOx conversion, the design molar ratio of ammonia-to-NOx is 0.95 at SCR inlet.
- *Ammonia Slip:* The design target ammonia slip level is less than 5 ppmv measured at the stack. There are no provisions for continuously monitoring ammonia concentration in the flue gas. When ammonia measurements in the flue gas are required, a wet chemical method will be utilized. These measurements are taken periodically over the operating life of the SCR catalyst. More frequent tracking of ammonia slip will be monitored by measuring the amount of residual ammonia adsorbed by the fly ash. Fly ash samples will be measured periodically using an ion-specific electrode. Ammonia slip may also be estimated from the ammonia injection monitoring system based on the NOx rate at the SCR inlet/outlet and the ammonia injection rate.
- *Gas Sampling Grid (GSG):* During commissioning and periodically over the life of the system, it will be necessary to tune the AIG to optimize the distribution of ammonia in the SCR inlet duct relative to the NOx distribution to provide optimum NOx conversion with minimum ammonia slip. To facilitate tuning, a manual gas sampling grid (GSG) is installed downstream of the last catalyst layer. The GSG allows a high-resolution traverse of the flue gas stream for composition across the outlet of the SCR, which can be used to precisely adjust the AIG. The GSG is comprised of individual small-bore (~½”) heavy-wall pipes extending from outside the SCR to distributed sampling locations below the last catalyst layer. Portable equipment is used to sample and measure gas concentrations using the GSG.

Attachment A to this report shows the process flow diagram for the proposed system and provides parametric data for normal load operation.

Ammonia Control System

An ammonia flow control valve adjusts the flow of undiluted anhydrous ammonia vapor from the operating vaporizer into the diluted ammonia stream via a mixing chamber. The flow control valve set point for the SCR

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reactor is established by an algorithm using an ammonia flow control loop with a cascaded, feed-forward control scheme. The lower controller in this scheme is a simple ammonia flow controller. The upper controller and its feed-forward signal develop the ammonia flow set point, which is compared to the measured ammonia flow compensated for temperature and pressure. The ammonia flow control valve is then adjusted accordingly when in automatic mode. The feed-forward signal is generated from the measured SCR inlet NO_x, the outlet NO_x set point, and the heat input to the boiler, which is estimated from the measured megawatt output of the steam turbine. The multiplication of the two signals, and the scaling factor, is used to determine the flow of ammonia (lbs/hr) required for the current uncontrolled NO_x emission rate into the SCR.

The upper controller of the cascaded control loop compares the SCR outlet NO_x rate to the preset NO_x set point. It then trims the feed-forward signal to adjust for any inaccuracies in the other measurements and for any ammonia slip that actually occurred. The stack NO_x signal is also monitored since it is the measurement used to determine compliance with the air permit limits. The scaling factor for the ammonia flow feed-forward signal (0.39) is based upon the differences in molecular weight between one molecule of NO_x and one molecule of ammonia. This calculation assumes that 95% of the NO_x will be NO and 5% of it will be NO₂. It also assumes that all of the ammonia molecules find NO_x to react with and that there is no ammonia slip.

The following table summarizes the expected ammonia injection rates at various loads:

Load %	Ammonia Injection Rate lb/hour
Peak	1319
75%	1000
50%*	695

* It is expected that the SCR will limit low load operation to a minimum load of about 275MW because the economizer outlet temperature may not meet the minimum 600°F required for ammonia injection. At 275 MW, the ammonia injection rate is expected to be about 785 lb/hour.

SCR Startup Procedure

The SCR dampers will initially be in the "bypass" position. The boiler should reach a minimum load of approximately 220 MW with stable firing on coal. The unit may be at any other load up to maximum, but load should be steady while the SCR is valved into the flue gas path.

The SCR outlet dampers are stroked in tandem to the full open position and pinned in place. The continuous cleaning sequence of the sonic horns is activated. Dilution airflow to the AIG is initiated to preclude flue gas or fly ash accumulation in the AIG. The SCR bypass damper is then slowly opened to SCR in-service position over a period of hours to heat the SCR reactor in a controlled manner while avoiding any upset to the furnace draft controls. The limiting constraint on thermal ramp rate is differential temperature, which must be no greater than 150° F (preliminary) between the internal structural members and stiffeners on the external skin of the reactor. The reactor is heated as quickly as possible within this constraint to minimize the transition time through the moisture and sulfuric acid dew points. It takes from 12 to 14 hours to open the dampers the first time the SCR is put in service, in part because moisture is driven off the insulation in the process. Thereafter, the heat-up procedure may take 8 to 12 hours.

The boiler load may be dispatched as required when the damper is fully opened and all of gas flow is through the SCR reactor. An FGAS sample fan is started and the SCR inlet and outlet NO_x concentration monitors are verified to agree with the stack CEMS. The bypass damper seal air pressure and flow are verified to assure 0% bypass. Ammonia injection may begin when the SCR catalyst reaches the minimum operating temperature of 600°F. If the boiler is at full load and the gas flow is at 100% of the design rate, the catalyst performance is still temperature limited. Ammonia should be limited to 80% of the flow rate at design conditions because the

catalyst activity is only sufficient to provide about 75% NO_x conversion at 600°F. When the catalyst reaches the design temperature of 680° F, ammonia flow can be increased to achieve the full 90% NO_x conversion.

Alternately the SCR may be in the flue gas path in while the unit undergoes a hot or cold start. The same reactor differential temperature constraints and minimum ammonia injection temperature applies. The catalyst is exposed to soot because the burners are not optimized for No. 2 fuel oil, which is used as a startup fuel. The unburned hydrocarbons from the fuel oil may block the catalyst pores and reduce the catalyst life. However, most deposits are expected to occur on the thin layer of fly ash on the catalyst surfaces. At this time, it is unknown whether the boiler or the catalyst will be the limiting constraint on startup time. The following conditions must be met before ammonia may be injected to the SCR:

- No unit Master Fuel Trip;
- SCR inlet and outlet dampers are fully opened;
- Catalyst at or above minimum operating temperature (~ 600° F);
- Ammonia / dilution air ratio is not high (> 10% by volume);
- Dilution air flow is not low; and
- Gaseous ammonia is above the minimum vaporizer outlet temperature.

SCR Shutdown Procedure

The ammonia injection is stopped and a delay time (< 1 hour) is allowed for the outlet NO_x concentration to rise to equal the inlet concentration. This period of gas flow without ammonia injection assures that all residual ammonia is consumed and provides the NFPA 8502 purge requirement. For a short outage, the SCR inlet bypass damper is stroked to the full bypass position in a controlled manner to avoid any furnace draft upset. The SCR outlet damper is then closed and seal airflow is established at both dampers. Operation of the sonic horns, FGAS sample fan, and dilution airflow may then be halted. The SCR catalyst is thus “bottled up” hot and will remain above the acid dew point for a considerable length of time because the reactor is well insulated. This procedure allows the boiler to be cooled more quickly because it is not also necessary to gradually cool the SCR reactor. It also allows the SCR system to be put back in service more quickly because gradual warm up of the catalyst is avoided.

For a long outage, if access to the inside of the reactor is required, the SCR dampers are kept open as the boiler is brought off line in the normal fashion. After discontinuing fuel flow, the ID and FD fans are left running to cool the boiler and SCR. The cooling time will be extended by up to 12 hours due to the thermal capacity of the SCR. The reactor should be isolated during any maintenance procedure that could subject the catalyst to excessive moisture, such as air preheater washing or economizer maintenance.

Techniques to Prevent Catalyst Fouling and Masking

Large “popcorn” ash particles have the potential to plug the protective screens on catalyst modules and may even plug the catalyst elements themselves. Such plugging leads to poor gas distribution within the SCR, higher draft loss across the SCR and reduced catalyst life. Large (> 4mm diameter) particles must be collected before they reach the catalyst. Fly ash particles must be kept moving through the catalyst and not allowed to accumulate.

Flow model studies of the SCR system are being conducted using both numerical and experimental methods. The numerical method uses computational fluid dynamics to predict flow patterns and particle behavior throughout the system. The experimental method includes a 1/12th scale model of the SCR system. Fans force air to flow through the model at velocities selected for similitude across the operating range of the full-scale reactor. Gas flow patterns in the model are observed using smoke, tracer gas and tufts of yarn. Areas of ash deposition are observed using cork dust to simulate fly ash. Gas flow distribution devices and popcorn ash collection devices are developed and tested.

The SCR inlet duct is designed to facilitate collection and removal of large ash particles. The 90-degree bend upward from the economizer outlet duct provides the change of flow direction necessary for momentum-based devices such as deflector plates. The large cross-sectional area is sized for low velocity (~ 35 feet/second) with upward vertical flow. This allows particle screens to be used with minimal abrasion and draft loss. Devices of these types will be tested and proven as part of the flow model study.

Acoustic cleaning devices (sonic horns) are provided for on line cleaning of fly ash from the catalyst and reactor surfaces. The SCR reactors are equipped with eight sonic horns per catalyst elevation to prevent ash accumulation. These horns operate in the audible sound range and prevent ash deposits by continually vibrating or fluidizing ash particles. The fluidized particles pass through the SCR under the force of flue gas flow and gravity. The compressed air system that supplies the sonic horns will be sized to allow for additional horns which may be added in the SCR inlet area to prevent ash deposits on turning vanes, beams, collection devices, etc.

Catalyst Maintenance Procedures and Schedule

The catalyst has been selected for a 16,000-hour life at design conditions. The initial catalyst load consists of two and a half layers. At the end of the first 16,000 hours, a full fourth layer is added. After the next interval (40,000 total hours), the half-layer is replaced with a full layer. Full layers are replaced in succession thereafter. Catalyst deactivation can be observed in a variety of ways such as ammonia slip tests, increased ammonia usage, and estimated ammonia slip determined by the ammonia injection control system.

SCR Bypass Duct

The SCR bypass duct is configured to allow boiler exhaust gas to bypass the SCR catalyst under specific circumstances. Initial design locates it so the bypass inlet is at the top of the SCR reactor and the outlet is at the bottom of the SCR reactor. Two large bypass dampers redirect the gas flow through this duct. The SCR reaction takes high temperatures for the chemical reaction to occur. These temperatures (> 600° F) do not exist until the unit is loaded to approximately 275 MW. In addition, a cold SCR must be gradually warmed to control thermal expansion.

Three conditions are anticipated that require bypass duct operation.

1. *Boiler Problems:* Problems may occur that require personnel entry into the boiler for maintenance: By closing the bypass dampers in this situation, the SCR remains thermally isolated and warm while the boiler is cooled for entry. By keeping the SCR warm, the SCR can be returned to operation much faster. It is estimated that boiler problems may occur approximately 10 to 12 times per year for a bypass time of approximately 60 hours. Note the unit is off line approximately 36 of these hours.
2. *Boiler Startup:* The SCR typically would require a longer startup time without bypassing. With the bypass, the dampers can be gradually opened to control SCR warming, which allows the system to reach the minimum SCR reactor temperature quicker than by adjusting boiler operation alone. It is estimated that such startups could occur about 10 times per year for a bypass time of approximately 48 hours.
3. *SCR Catalyst Problems:* Problems with the catalyst (such as plugging) would require maintenance and inspections on the SCR itself. The bypass would be used to allow entry and work on the SCR reactor without taking the boiler off line. These events on other units range from 4 days to 2 weeks in duration and would be expected to occur about 3-4 times per year on a unit operated with SCR year-round.

Gulf Power believes operations during periods of startup, shutdown and malfunction do not constitute representative conditions and are exempt as excess emissions. Thus, the SCR bypass should be authorized for unit startup and shutdown including boiler and SCR maintenance as "periods of malfunction". Gulf Power requests that bypass operation for boiler and SCR maintenance be permitted for 15 days during 2005 and up to 15 days per calendar year thereafter. During bypass operations the NOx emissions limit should be a 24-hour average at 0.35 lb/MMBtu from Crist Unit 7. These periods should *not* be included in the 30-day emission average for NOx on a daily average basis during those days.

Conclusion

In the mid-1990's, Southern Company Services participated in a joint SCR demonstration project with the U.S. Department of Energy. The purpose of the project was to evaluate SCR retrofit technology for reducing NOx emissions from utility boilers burning U.S. coals with a high sulfur content (~ 2.5% sulfur by weight). The demonstration project was conducted on Unit 5 at the Crist Electrical Generating Plant. Unit 5 is a tangentially fired, dry bottom boiler rated at 75 MW, which was built in 1961. Particulate matter emissions are controlled by both hot-side and cold-side ESPs. A slipstream of exhaust gas was used to test nine different SCR catalyst configurations. The SCR demonstration project showed the following:

- Each tested SCR catalyst provided at least 80% NOx reduction with an ammonia slip of less than 5 ppm.
- There was no unusual catalyst deactivation attributed to the use of high-sulfur U.S. coals containing typical amounts of metals such as arsenic.
- Both plate and honeycomb catalysts performed satisfactorily.
- The project concluded that the SCR process can achieve up to 90% NOx reductions with relatively low ammonia slip levels over an extended period of operation (at least two years).

In addition to this early experience, Southern Company Services recently designed and installed 12 SCR systems for five power plants in the Atlanta and Birmingham metropolitan areas. Based on Southern Company's designs, SCR systems began operation at Georgia Power's Bowen Plant in 2001 and Alabama Power's Plant Gorgas in 2002.

The design specifications appear to fall within the typical ranges for similar SCR projects and the conclusions of the earlier SCR demonstration project conducted at the Crist plant. Based on the application, the preliminary design will achieve a minimum NOx conversion efficiency of 85% as required by the Agreement. Although the Department does not oppose the SCR bypass as a design element, it does not believe it is appropriate exclude periods of uncontrolled NOx emissions during the ozone season from the plant-wide NOx standard specified in the Agreement. To reflect a minimum level of control for the SCR system and to address the bypass issue, the Department intends to include the following permit conditions:

- SCR Design: The permittee shall construct, tune, operate, and maintain a new SCR system for Unit 7 to reduce emissions of nitrogen oxides (NOx) as described in the application, approved drawings, plans, and other documents on file with the Department. The SCR system shall be designed to achieve no less than an 85% reduction in NOx emissions as measured across the SCR unit inlet and outlet. The designed target ammonia slip level is 5 ppmv based on a 24-hour average. The storage of ammonia shall comply with all applicable requirements of the Chemical Accident Prevention Provisions in 40 CFR 68. [Design; Paragraph 1 of the Agreement; Rule 62-204.800, F.A.C.; 40 CFR 68]
- Unit 7 NOx Standard (Interim): Prior to implementing the required NOx control strategy for Units 4, 5, and 6, the NOx emissions from Unit 7 shall not exceed 0.15 lb/MMBtu of heat input based on a 30-day rolling average when the SCR system is operational with a catalyst temperature of at least 600° F. The permittee shall demonstrate compliance with data collected from the certified CEMS. This standard is effective on the date the CEMS is re-certified in accordance with the acid rain provisions of 40 CFR 75. After the required NOx control strategy is implemented for Units 4, 5, and 6, the plant-wide NOx standard shall supersede this interim standard. {Note: This covers the period after the Unit 7 SCR is placed in operation, but before implementation of the additional NOx control strategy required for Units 4, 5, 6 and 6.} [Design; Rules 62-4.070(3), F.A.C.]
- SCR Bypass, Startup/Shutdown: During Unit 7 startup and shutdown, the SCR system may be bypassed in accordance with manufacturer's recommended procedures to allow for controlled catalyst heating and cooling. During startup, the SCR system shall be on line and functioning when the minimum operating temperature of the catalyst is achieved ($\geq 600^{\circ}$ F). During shutdown, the SCR system may be removed from

service when the catalyst temperature drops below 600° F. [Design; Rule 62-210.700, F.A.C.] *{This is a critical design specification for the catalyst. Below this temperature, the efficiency of NOx reduction reaction across the catalyst begins to drop rapidly. In addition, Unit 7 will be at low loads (< 275 MW) below a catalyst temperature of 600° F.}*

- **SCR Bypass, Catalyst Maintenance and Repair:** The permittee may bypass the SCR system to perform catalyst maintenance and repair for up to 15 days per year during the non-ozone season. During such allowable bypass periods, the uncontrolled NOx emissions from Unit 7 shall not exceed 0.35 lb/MMBtu based on a 24-hour average. The daily NOx emission rates for these periods may be excluded from the plant-wide 30-day NOx standard. The permittee shall notify the Compliance Authority in advance of the purpose of the SCR bypass, the expected dates of SCR bypass, and the expected duration of SCR bypass. [Rules 62-210.700 and 62-4.070(3), F.A.C.] *{Note: The ozone season is defined as May 1st through September 15th. For this 4 1/2 months period, the Department believes that prudent planning will allow the permittee to schedule and perform catalyst maintenance and repair during the non-ozone season.}*
- **Plant-wide NOx Standard:** Emissions of nitrogen oxides (NOx) from the combined operation of Units 4, 5, 6, and 7 shall not exceed 0.2 lb/MMBtu heat input based on a 30-day rolling average except for periods when Unit 7 is shutdown. *{Note: The draft permit details the determination of compliance with this standard. It allow for the exclusion of CEMS data when the catalyst temperature is below 600° F during a startup/shutdown or when the SCR is bypassed as authorized during the non-ozone season.}*

The draft permit requires continuous monitoring to demonstrate compliance with the standards for opacity and NOx emissions. Performance testing is required for particulate matter, NOx reduction efficiency, and ammonia slip. Quarterly reports are required to summarize compliance with the NOx and opacity standards.

Continuous Monitoring

The existing NOx CEMS will be replaced with a dual-range model. The low range will be used to monitor emissions with the SCR in operation and the high range when the SCR is out of service. There will be no change in the monitor location. The stack probe and duct locations will remain as currently noted in the facility's CEMS monitoring plan. Other related miscellaneous equipment changes to the monitor and data acquisition system will be made to support the dual range analyzer. A chemical ammonia scrubber will be added to the sampling line to remove any ammonia in the sample to avoid interference with determining the NOx emission rate. According to EPA guidance, an ammonia scrubber is an appropriate response to this potential problem.⁶ Due to the numerous changes, it will be necessary to recertify the NOx CEMS for purposes of the Acid Rain program, 40 CFR 75.

Gulf Power also proposes to modify the current CEMS to compensate measurements for changes in temperature, pressure, and molecular weight based on the EPRI dilution probe correction algorithm. This will require changes to the existing dilution probe, addition of pressure and temperature sensors, and the data acquisition system. The purpose is to provide a more accurate determination of the heat input rate, which is used to demonstrate compliance with permits standards (lb/MMBtu). New SCR inlet/outlet NOx monitors will be installed to provide the inputs necessary to adjust the ammonia injection rate.

5. PRELIMINARY DETERMINATION

The pollution control project is based on the design and operation of conventional air pollution control equipment: an electrostatic precipitator and a selective catalytic reduction system. These air pollution control devices are operating successfully on numerous coal-fired utility boilers throughout the world. However, the Department acknowledges that the designs presented in the application are preliminary and based on the information that was available at the time of application. The draft permit requires Gulf Power to update the Department with final design specifications and any major changes made to the final design specifications during the actual construction phase.

The Department makes a preliminary determination that the proposed project will comply with the terms of the

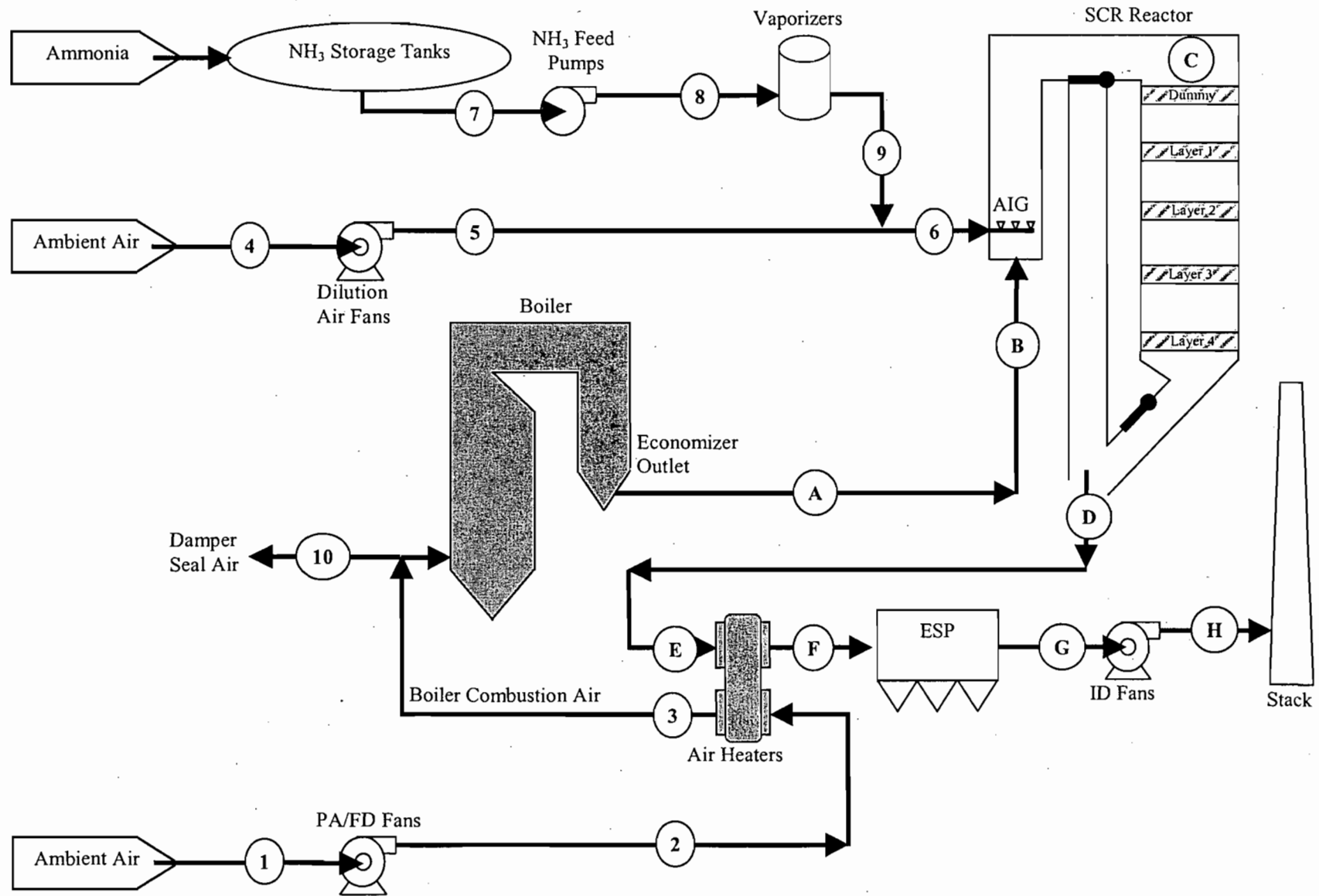
TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Agreement and all existing applicable air pollution regulations. This determination is based on a technical review of the application, the preliminary design, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. 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.

REFERENCES


1. Attachment A – Data Compiled from the Department's ARMS Database
2. EPA's Handbook titled, "Control Technologies for Hazardous Air Pollutants"; Document No. EPA/625/6-91-014; June 1991; Section 4.10, Electrostatic Precipitators
3. "Air Pollution Control Technology Handbook"; Karl B. Schnelle, Jr. and Charles A. Brown; 2002 by CRC Press LLC; ISBN 0-8493-9588-7; Chapter 24, Electrostatic Precipitators
4. "Control of Nitrogen Oxide Emissions: Selective Catalytic Reduction (SCR)"; July 1997 Issue of *Clean Coal Technology*, Topical Report No. 9; U.S. Department of Energy and Southern Company Services, Inc.
5. EPA's Guidebook for Course #SI:412B titled, "Electrostatic Precipitator Plan Review"; Document No. EPA 450/2-82-019; July 1983; Section 3 (ESP Design Parameters and Their Effects on Collection Efficiency) and Section 4 (ESP Design Review)
6. EPA's "Emissions Measurement Center" web site at : www.epa.gov/ttn/emc/faq.htm; See "CEMS/NOx"

PROCESS FLOW DIAGRAM FOR CRIST UNIT 7 ESP/SCR PROJECT



TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION – ATTACHMENT A

NORMAL MAX LOAD MASS AND ENERGY BALANCES

	Gulf Power Company Plant Crist Unit 7								Date: 1/17/2003 Revision: A Case: Normal Max. Page: 2 Document No.:	
	PROCESS STREAM DETAILS									
STREAM	A	B	C	D	E	F	G	H		
	Economizer Outlet	AIG Inlet	SCR Inlet	SCR Outlet	APH Gas Inlet	APH Gas Outlet	ID Fan Inlet	ID Fan Outlet		
Temperature, F	725	724	720	719	719	240	230	234		
Pressure, in. w.g.	-10.0	-10.6	-12.2	-14.3	-14.5	-23.1	-24.8	0.0		
Pressure, in.w.a.	394.2	393.6	392.0	389.9	389.7	381.1	379.4	404.2		
Gas Flow, acfm	2,408,482	2,440,264	2,464,625	2,475,671	2,480,568	1,754,182	1,823,540	1,722,044		
Gas Flow, scfm	1,039,916	1,052,971	1,062,577	1,062,577	1,064,225	1,239,433	1,301,405	1,301,405		
Gas Flow, lb/hr	4,762,428	4,768,532	4,812,037	4,812,037	4,819,498	5,612,957	5,893,605	5,893,605		
NOx, lb/hr (as NO2)	3,414	3,414	3,414	341	341	341	341	341		
Particulate, lb/hr	23,835	23,835	23,835	23,835	23,835	23,835	119	119		
STREAM	1	2	3	4	5	6	7	8	9	10
	FD Fan Inlet	FD Fan Outlet	APH Air Outlet	Dilution Air Fan Inlet	Dilution Air Fan Outlet	AIG Feed	Ammonia Feed Pump Suction	Ammonia Feed Pump Discharge	Regulated Ammonia Flow	Damper Seal Air from Secondary
Temperature, F	75	76	460	75	77	77	75	75	40	460
Pressure, in. w.g.	-0.4	13.0	7.0	-1.0	40.0	30.0	-	-	25.0	2.0
Pressure, in.w.a.	403.8	417.2	411.2	403.2	444.2	434.2	-	-	429.2	406.2
Gas Flow, acfm	1,208,946	1,171,654	1,735,295	9,684	8,824	9,283	-	-	406	5,300
Gas Flow, scfm	1,184,339	1,184,339	1,006,688	9,472	9,472	9,740	-	-	452	3,046
Gas Flow, lb/hr	5,289,729	5,289,729	4,496,270	42,307	42,307	43,504	1,197	1,197	1,197	13,566
Pressure, psig	-	-	-	-	-	-	125	125	-	-
NOTES: 1. All flows are total for one boiler unit. 2. Standard conditions are based on 68 deg. F and 29.921 in.Hg. 3. Air to sonic horns and bypass due to FGAS sampling is neglected. 4. Flows streams exclude equipment sizing margins.										

DRAFT PERMIT

PERMITTEE

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Pensacola, FL 32520-0328

Authorized Representative:

Gene L. Ussery, Jr., V.P. of Power Generation

Crist Electric Generating Plant Unit 7 ESP/SCR Project Facility ID No. 0330045 SIC No. 4911 Air Permit No. 0330045-005-AC Permit Expires: December 1, 2005

PROJECT AND LOCATION

This permit authorizes the construction of a new electrostatic precipitator and the installation of a new selective catalytic reduction system for Unit 7 at the existing Crist Electric Generating Station, which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida. The map coordinates are: Zone 16; 478.50 km East; and 3381.30 km North.

STATEMENT OF BASIS

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

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(DRAFT)

Howard L. Rhodes, Director
Division of Air Resources Management

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

The existing plant consists of seven fossil fuel fired steam generators and two fly ash silos. Natural gas is the primary fuel for Units 1, 2 and 3. Pulverized coal is the primary fuel for Units 4, 5, 6 and 7. Fuel oil is used as supplemental fuel in all seven of the units. The following units are affected by this air construction permit.

ID	Emission Unit Description
001	Boiler No. 1 (Phase II Acid Rain Unit)
002	Boiler No. 2 (Phase II Acid Rain Unit)
003	Boiler No. 3 (Phase II Acid Rain Unit)
004	Boiler No. 4 (Phase I and II Acid Rain Unit)
005	Boiler No. 5 (Phase I and II Acid Rain Unit)
006	Boiler No. 6 (Phase I Acid Rain Unit)
007	Boiler No. 7 (Phase I Acid Rain Unit)

REGULATORY CLASSIFICATION

Title III: The existing facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The existing facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

RELEVANT DOCUMENTS

The permit application and additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: All documents related to applications for permits to construct, modify, or operate emissions units at this facility shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all permit applications shall also be sent 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, Pensacola, Florida 32501-5794.
3. Appendices: The following Appendices are attached as part of this permit: Appendix CF (Citation Format); Appendix GC (General Conditions); and Appendix SC (Standard Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated 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. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-4, 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
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. Construction Approval: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Rule 62-210.200(76), F.A.C. defines *construction* as, "The act of performing on-site fabrication, erection, installation or modification of an emissions unit or facility of a permanent nature, including installation of foundations or building supports; laying of underground pipe work or electrical conduit; and fabrication or installation of permanent storage structures, component parts of an emissions unit or facility, associated support equipment, or utility connections. Land clearing and other site preparation activities are not a part of the construction activities." Such permits shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions units. 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 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. [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 007 – Boiler No. 7

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

<p>Emissions Unit No. 007</p> <p><i>Description:</i> Unit 7 is a Foster Wheeler front and rear wall fired, dry bottom boiler that began commercial operation on August 1, 1973.</p> <p><i>Fuels:</i> coal, natural gas, new No. 2 fuel oil and/or on-specification used oil</p> <p><i>Capacity:</i> 6406 MMBtu/hour when firing pulverized coal and/or natural gas</p> <p><i>PM Controls:</i> Cold side electrostatic precipitator</p> <p><i>NOx Controls:</i> Low NOx burners and selective catalytic reduction</p> <p><i>Continuous Monitors:</i> CO₂, NO_x, SO₂, opacity, stack gas flow, and ammonia injection rate</p> <p><i>Stack Parameters:</i> Units 6 and 7 share a common stack that is 450 feet tall with a diameter of 23.2 feet. The volumetric flow rate of Unit 7 at permitted at capacity is approximately 2,463,000 acfm.</p> <p><i>{Permitting Notes: Based on the current Title V air operation permit, Unit 7: is regulated under Rule 62-296.405, F.A.C. (Fossil Fuel Fired Steam Generators > 250 MMBtu/Hour Heat Input); predates the requirements of Rule 62-212.400, F.A.C. (PSD Preconstruction Review); and is regulated under Phase I of the federal Acid Rain Program (40 CFR 75).}</i></p>

{Permitting Note: On August 28, 2002, Gulf Power Company and the Florida Department of Environmental Protection entered into an agreement titled, "Agreement for the Purpose of Ensuring Compliance with the Ozone Ambient Air Quality Standards" (Agreement). The "Agreement" is the basis for many of the following permit conditions.}

PREVIOUS APPLICABLE REQUIREMENTS

1. Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for this emissions unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070, F.A.C.]

EQUIPMENT AND CONSTRUCTION

2. Electrostatic Precipitator (ESP): To control emissions of particulate matter, the permittee shall construct, tune, operate, and maintain a new cold-side ESP for Unit 7 to replace the existing equipment as described in the application, approved drawings, plans, and other documents on file with the Department.

{Permitting Note: Alstom Power Inc. designed the new cold-side ESP, which will generally consist of two gas tight chambers. Each chamber will have three cells with five electrical fields per cell. There will be at least 30 total electrical fields (transformer-rectifier sets) with each field having approximate overall dimensions of 29 feet wide by 12 feet deep with a height of about 49 feet. The collecting plates will consist of 16-gage steel and have a spacing of approximately 15.75 inches. The discharge electrodes will be rigid. Each of the 30 transformer-rectifier sets will be controlled by a microprocessor-based controller with field energizing optimization and high-speed field bus communication. The preliminary design control efficiency is 99.64%.

A tumbling hammer rapping system will be used to remove captured fly ash from collecting plates. The maximum rapping density will be about 1163 square feet of collecting electrode per rapper. The preliminary design uses the existing control system to adjust the cleaning cycle and frequency to minimize opacity spikes due to re-entrainment. Approximately sixty hoppers (two per field) will hold the collected ash. The new ash collection hoppers will be tied in to the existing dry fly ash removal system. The ESP will also be equipped with a data management system for remote control and communications with the high

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A. EU 007 – Boiler No. 7

voltage power supplies and rapper control systems.

This information is based on the preliminary design and is subject to change. The permittee shall update this information as necessary during the process of final design and installation. [Design; Paragraph 1 of the Agreement]

3. **Selective Catalytic Reduction (SCR) System:** The permittee shall construct, tune, operate, and maintain a new SCR system for Unit 7 to reduce emissions of nitrogen oxides (NOx) as described in the application, approved drawings, plans, and other documents on file with the Department. The SCR system shall be designed to achieve no less than an 85% reduction in NOx emissions as measured across the SCR unit inlet and outlet. The designed target ammonia slip level is 5 ppmv based on a 24-hour average. The storage of ammonia shall comply with all applicable requirements of the Chemical Accident Prevention Provisions in 40 CFR 68.

{Permitting Note: Southern Company Services Inc. designed the new SCR system, which will generally consist of the following:

- **Catalyst Structure:** Arranged in four° layers, the catalyst is a plate-type structure fabricated by applying ceramic catalyst material to a perforated stainless steel mesh grid plate. The active catalyst component is vanadium pentoxide. The system has an operational temperature range between 600° to 800° F (optimum temperature > 680° F). The initial configuration will have a catalyst volume of approximately 26,000 cubic feet in 2½ layers. As the catalyst gradually deactivates through use, the remaining layers will be filled and old layers replaced. With all four potential layers in place, the catalyst volume is approximately 41,600 cubic feet.
- **Ammonia Injection System:** Anhydrous ammonia will be delivered by truck or rail and stored on site in two 20,500 gallons tanks. Ammonia is distributed into the SCR inlet duct through the ammonia injection grid (AIG), which is divided into about two dozen zones. Each zone is equipped with a flow indicator and manual control valve for tuning the AIG to match the inlet NOx profile. A static mixer installed upstream of the AIG creates flow resistance, flattens this profile, and makes gas flow uniform. A second static mixer is installed downstream of the AIG. The elements of this mixer are precisely oriented with the AIG injection points to impart a swirl to the diluted ammonia and promote good mixing with the flue gas. A manual gas sampling grid (GSG) is installed downstream of the last catalyst layer, which allows a high-resolution traverse of the flue gas stream. Gas composition data collected from the GSG is used to precisely adjust and tune the AIG. The preliminary design is based on a 0.95 molar ratio of ammonia-to-NOx.
- **Ammonia Control System:** The ammonia control system consists of a control loop with a cascaded, feed-forward control scheme. Process monitors will provide NOx emission rate data collected at the inlet to and the outlet from the SCR system. The ammonia injection rate is set based on a variety of input data including the measured NOx rates at the SCR inlet/outlet, the outlet NOx set point, the heat input to the boiler, the actual NOx rate measured by the stack monitor, and a scaling factor based on the molecular weights of ammonia and NOx. The system is capable of continually adjusting flow control valves to fine-tune the ammonia injection rate based on changing gas stream conditions.
- **SCR Bypass:** The SCR design incorporates dampers and ductwork to provide the capability of bypassing the SCR system. The bypass is most commonly used to gradually heat or cool the catalyst structure to minimize thermal fatigue during startup and shutdown. During catalyst maintenance and repair, it would also allow access to the SCR reactor without requiring complete shutdown of the Unit 7 boiler.

This information is based on the preliminary design and is subject to change. The permittee shall update this information as necessary during the process of final design and installation. [Design; Paragraph 1 of

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the Agreement; Rule 62-204.800, F.A.C.; 40 CFR 68]

4. Updated Designs: The permittee shall update the Department with final design specifications and any substantial changes made to the final design specifications during the actual construction phase. [Rule 62-4.070(3), F.A.C.]
5. Project Completion: The permittee shall complete construction and commence operation of the new ESP before placing the SCR system in service. By May 1, 2005, the permittee shall complete construction, begin operating, and continue operating the SCR system whenever Unit 7 is online unless otherwise authorized by this permit. [Applicant Request; Design; Paragraph 1 of the Agreement]

PERFORMANCE REQUIREMENTS

{Permitting Note: This permit does not alter any specifications or limitations included in previous permits that define permitted capacities such as heat input rates, fuel consumption, or hours of operation. It does not authorize any additional fuels or such other methods of operation.}

EMISSIONS STANDARDS

{Permitting Note: Particulate matter emissions continue to be regulated by Rules 62-296.405(1)(b) and 62-210.700(3), F.A.C. in accordance with current Title V Permit Nos. C.7 and C.8.}

6. Stack Opacity: The flue gas opacity from Unit 7 shall not exceed 20% based on a 6-minute block average, except for one 6-minute block per hour that shall not exceed 27%. Compliance shall be determined by data collected from the certified continuous opacity monitor or EPA Method 9, which is incorporated by reference in Chapter 62-297, F.A.C. This standard is effective on the date of the initial compliance test for particulate matter and thereafter. *{Permitting Note: Stack opacity during soot blowing and load change continues to be regulated by Rule 62-210.700(3), F.A.C. in accordance with current Title V Permit Condition C.6. Excess emissions due to startup, shutdown, and malfunction continue to be regulated by Rule 62-210.700(1), (2), and (4), F.A.C. in accordance with current Title V permit Condition Nos. C.12, C.13, and C.14.}* [Design; Rule 62-4.070(3), F.A.C.]
7. Nitrogen Oxides (Interim): Prior to implementing the required NO_x control strategy for Units 4, 5, and 6, the NO_x emissions from Unit 7 shall not exceed 0.15 lb/MMBtu of heat input based on a 30-day rolling average when the SCR system is operational with a catalyst temperature of at least 600° F. The permittee shall demonstrate compliance with data collected from the certified CEMS. This standard is effective on the date the CEMS is re-certified in accordance with the acid rain provisions of 40 CFR 75. After the required NO_x control strategy is implemented for Units 4, 5, and 6, the plant-wide NO_x standard specified in Subsection 3B shall supersede this interim standard. [Design; Rules 62-4.070(3), F.A.C.]

SCR BYPASS OPERATION

8. SCR Bypass, Startup/Shutdown: During Unit 7 startup and shutdown, the SCR system may be bypassed in accordance with manufacturer's recommended procedures to allow for controlled catalyst heating and cooling. During startup, the SCR system shall be on line and functioning when the minimum operating temperature of the catalyst is achieved ($\geq 600^{\circ}$ F). During shutdown, the SCR system may be removed from service when the catalyst temperature drops below 600° F. [Design; Rule 62-210.700, F.A.C.]
9. SCR Bypass, Catalyst Maintenance and Repair: The permittee may bypass the SCR system to perform catalyst maintenance and repair for up to 15 days per year during the non-ozone season. During such allowable bypass periods, the uncontrolled NO_x emissions from Unit 7 shall not exceed 0.35 lb/MMBtu based on a 24-hour average. The daily NO_x emission rates for these periods may be excluded from the plant-wide 30-day NO_x standard specified in Subsection 3B. The permittee shall notify the Compliance Authority in advance of the purpose of the SCR bypass, the expected dates of SCR bypass, and the

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expected duration of SCR bypass. *{Permitting Note: The ozone season is defined as May 1st through September 15th.}* [Rules 62-210.700 and 62-4.070(3), F.A.C.]

EMISSIONS PERFORMANCE TESTING

10. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification shall include: the scheduled date, approximate start time, test team, contact name and phone number, description of unit to be tested, and the tests to be performed. [Rule 62-297.310(7)(a)9, F.A.C.]
11. Particulate Matter, Compliance Tests: Within 60 days after completing construction of the ESP and bringing Unit 7 on line, the permittee shall conduct tests to demonstrate compliance with the emissions standards for particulate matter and opacity. Tests for particulate matter shall be conducted in accordance with the methods and procedures currently specified in the Title V air operation permit. Subsequent tests shall be conducted during each federal fiscal year (October 1st to September 30th). The permittee shall demonstrate initial compliance with the opacity standard by submitting the data collected from the certified continuous opacity monitor for each particulate matter test run. [Rule 62-297.310(7), F.A.C.]
12. Nitrogen Oxides, Compliance Tests: Within 60 days after completing construction of the SCR system and bringing Unit 7 on line, the permittee shall conduct tests to demonstrate compliance with the design specification to achieve no less than an 85% reduction in the nitrogen oxide emission rate. The permittee shall concurrently test the SCR inlet and SCR outlet in accordance with EPA Method 7E as adopted by reference in Rule 62-204.800, F.A.C. Data collected during the annual NO_x RATA testing may be used to represent NO_x emissions at the SCR outlet. Alternatively, the permittee may submit data collected from the NO_x rate process monitors at the SCR inlet and SCR outlet, which are part of the ammonia injection system. The data shall be collected for at least three consecutive hours. Subsequent tests shall be conducted during each federal fiscal year (October 1st to September 30th). [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]
13. Ammonia Slip, Performance Tests: Within 60 days after completing construction of the SCR system and bringing Unit 7 on line, the permittee shall conduct tests to determine the ammonia slip rate in accordance with EPA Method CTM-027 or other methods approved by EPA. Subsequent tests shall be conducted during each federal fiscal year. If tests show ammonia slip emissions are greater than the design target level specified in Condition No. 3 of this subsection, the permittee shall take corrective actions such as repair, addition of catalyst, replacement of catalyst, etc. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

{Permitting Note: EPA Methods 1 (Traverse Points), 2 (Velocity and Flow Rate), 3 (Gas Analysis), 4 (Moisture Content), and 19 (Calculating Emission Rates, Use of F-Factors) may also be used to supplement the required test methods.}

CONTINUOUS MONITORING REQUIREMENTS

{Permitting Note: In accordance with the federal Acid Rain requirements, the following continuous monitors are installed on these units: SO₂, NO_x, CO₂ and stack gas flow.}

14. COMS: The permittee shall install, calibrate, operate and maintain a continuous opacity monitoring system (COMS) to demonstrate compliance with the stack opacity standard. The COMS shall monitor and record data during all periods of Unit 7 operation including startup, shutdown, malfunction or emergency conditions, but not including continuous monitoring system breakdowns, repairs, or calibration checks. *{Permitting Note: The existing COMS required by the Acid Rain program satisfies this requirement.}* [Rule 62-4.070(3), F.A.C.]
15. NO_x CEMS: To demonstrate compliance with the emissions standards, the permittee shall install,

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calibrate, operate and maintain a continuous emissions monitoring system (CEMS) to continuously monitor and record the emissions of nitrogen oxides and an appropriate diluent gas (carbon dioxide or oxygen). The CEMS shall monitor and record data during all periods of Unit 7 operation including startup, shutdown, malfunction or emergency conditions, but not including continuous monitoring system breakdowns, repairs, calibration checks, or zero and span adjustments. For each calendar quarter, monitor availability shall be 95% or greater. If unable to achieve this level, the permittee shall submit a report identifying the problems in achieving 95% monitor availability and a plan of corrective actions. The permittee shall implement the reported corrective actions within the next calendar quarter. *{Permitting Note: The existing NOx CEMS required by the Acid Rain program satisfies this requirement. Due to the substantial changes being made to the existing monitor as a result of this project, it will be necessary to re-certify the existing CEMS in accordance with the provisions of 40 CFR 75.}* [Rule 62-4.070(3), F.A.C.]

RECORDS AND REPORTS

16. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the provisions of Rule 62-297.310(8), F.A.C. For each required test run, the report shall indicate the actual heat input rate (MMBtu/hour), the NOx emission rate (lb/MMBtu) as recorded by the CEMS, and the ammonia injection rate (lb/hour). The report shall also include copies of the continuous monitoring records for opacity and NOx emissions. [Rule 62-297.310(8), F.A.C.]

17. Quarterly Report

a. *NOx Summary*: For each calendar day during the reporting quarter, the permittee shall report the following information related to the NOx CEMS for Unit 7:

- Hours of operation for Unit 7;
- Daily average NOx emission rate, lb/MMBtu;
- 30-day average NOx emission rate, lb/MMBtu; and
- Whether or not the day included a startup, shutdown, malfunction or bypass of the SCR.

Identify the “F” factor used for any calculations, the method of determination, and type of fuel combusted. For each day that CEMS data was not obtained for at least 18 hours of Unit 7 operation, provide a justification for not obtaining sufficient data and describe the corrective actions taken to prevent this in the future. Identify any emissions data excluded from the calculation of emission rates due to startup, shutdown, or malfunction.

b. *Opacity Summary*: For each calendar day during the reporting quarter, the permittee shall report each 6-minute period in excess of the opacity standard.

c. *Gas Sampling Grid (GSG)*: The permittee shall summarize any tests using the GSG that were conducted during the calendar quarter.

Each quarterly report is due within 30 days of the calendar quarter being reported.

[Rule 62-4.070(3), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

B. EUs 001 to 007 – Combined Conditions

This section of the permit addresses the following emissions units.

EU No.	Title V Emissions Unit Description
001	Boiler No. 1 (Phase II Acid Rain Unit)
002	Boiler No. 2 (Phase II Acid Rain Unit)
003	Boiler No. 3 (Phase II Acid Rain Unit)
004	Boiler No. 4 (Phase I and II Acid Rain Unit)
005	Boiler No. 5 (Phase I and II Acid Rain Unit)
006	Boiler No. 6 (Phase I Acid Rain Unit)
007	Boiler No. 7 (Phase I Acid Rain Unit)

{Permitting Note: August 28, 2002, Gulf Power Company and the Florida Department of Environmental Protection entered into an agreement titled, "Agreement for the Purpose of Ensuring Compliance with the Ozone Ambient Air Quality Standards". This agreement is the basis for the following permit conditions.}

REQUIREMENTS OF THE AGREEMENT

1. **Supplemental Conditions:** The conditions of this section supplement all other valid air construction and operation permits for these units. These conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070(3), F.A.C.]
2. **Plant-Wide NOx Limit:** Emissions of nitrogen oxides (NOx) from the combined operation of Units 4, 5, 6, and 7 shall not exceed 0.2 lb/MMBtu heat input based on a 30-day rolling average except for periods when Unit 7 is shutdown. The plant-wide daily NOx emission rate shall be determined by the following equation:

$$\text{Plant-Wide Daily MMBtu-Weighted NOx Emission Rate} = \frac{\sum_{\text{Units 4, 5, 6, 7}} [(\text{Unit \# daily MMBtu}) \times (\text{Unit \# daily NOx CEMS Rate})]}{\sum_{\text{Units 4, 5, 6, 7}} (\text{Unit \# daily MMBtu})}$$

The "Unit # daily MMBtu" shall be determined by the daily as-burned fuel analysis and the fuel fired for each unit. The "Unit # daily NOx CEMS Rate" shall be determined by the daily average of NOx CEMS data for each unit and reported in terms of "lb/MMBtu heat input". The plant-wide daily NOx emissions rate shall be determined each day regardless of the operating status for Unit 7. The plant-wide 30-day rolling NOx average shall be determined for each 30 sequential Unit 7 operating days, which need not be consecutive. A Unit 7 operating day means any calendar day that Unit 7 operates a minimum of 18 hours. The Unit 7 daily NOx CEMS rate may consist of less than 18 hours of data if this is due to CEMS malfunction or invalid CEMS data. When the catalyst temperature is below 600° F during a startup or shutdown, NOx emissions data collected during such periods may be excluded from the daily NOx average. In accordance with Condition No. 9 of Subsection 3A, NOx emissions data collected during SCR bypass during the non-ozone season may be excluded from the daily NOx average. The plant-wide NOx emission standard shall be achieved by utilizing the SCR system for Unit 7 and implementing the selected NOx control strategy for Units 4, 5, and 6. The effective date for the plant-wide NOx emission standard is:

- a. The startup date of the selected additional NOx reduction project, (excluding an SCR project for Unit 6), but no later than May 1, 2006; or
- b. The startup date of the SCR project for Unit 6, but no later than December 31, 2007.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

B. EUs 001 to 007 – Combined Conditions

For purposes of this condition, “startup date” shall mean the date that the permittee demonstrates initial compliance with the terms of the required air construction permit (or other Department approval) that authorized implementation of the additional NO_x reduction project. [Paragraphs 2, 3 and Exhibit B of the Agreement]

3. **NO_x CEMS:** To demonstrate compliance with the plant-wide NO_x emissions standard, the permittee shall install, calibrate, operate and maintain continuous emissions monitoring systems (CEMS) to continuously monitor and record the emissions of nitrogen oxides and an appropriate diluent gas (carbon dioxide or oxygen) from Units 4, 5, 6, and 7. *{Permitting Note: The existing NO_x CEMS required by the Acid Rain program satisfy this requirement.}* [Exhibit B of the Agreement]
4. **Quarterly Report:** For each calendar day during the reporting quarter, the permittee shall report the following information related to the NO_x CEMS for Unit 7:
 - Daily NO_x emission rate for each boiler, lb/MMBtu;
 - Daily heat input rate for each boiler, MMBtu/day;
 - 30-day plant-wide NO_x emissions rate, lb/MMBtu;
 - Identify whether Unit 7 operated less than 18 hours;
 - Identify the occurrence of a Unit 7 startup or shutdown; and
 - Identify operation of Unit 7 with SCR bypass for catalyst maintenance or repair and the duration of bypass (hours).

Identify the “F” factor used for any calculations, the method of determination, and type of fuel combusted. For each day that CEMS data was not obtained for at least 18 hours of Unit 7 operation, provide a justification for not obtaining sufficient data and describe the corrective actions taken to prevent this in the future. Identify any emissions data excluded from the calculation of emission rates due to startup, shutdown, or malfunction.

{Permitting Notes: To achieve the plant-wide NO_x standard for the Crist Plant, Gulf Power Company will take the following additional actions.

Unit Retirements: The Agreement requires the retirement of Unit 1 within 120 days of receiving a final order from the Public Service Commission that authorizes the recovery of costs associated with the pollution control equipment incurred pursuant to the Agreement through the Environmental Cost Recovery Clause. A final order is one that is no longer subject to review or appeal by a court of competent jurisdiction. The Agreement also requires the retirement of Units 2 and 3 on or before May 1, 2006. [Paragraph 4 of the Agreement]

Additional NO_x Reduction Projects: The Agreement requires Gulf Power Company to conduct a variety of engineering studies to determine the feasibility of NO_x reduction technologies for one or more of the three remaining coal-fired units (Units 4, 5, and 6). The studies and related unit-specific demonstration projects may include (but are not limited to) SCR, selective non-catalytic reduction (SNCR) technology, over-fired air (OFA) technology, natural gas re-burn technology, selective use of biomass fuel, etc. The studies must be complete by May 1, 2005. Before implementing any NO_x reduction technology or combination of technologies, Gulf Power Company must obtain written concurrence from the Department that the use thereof is reasonable and necessary to achieve the overall plant-wide NO_x emission standard. If a NO_x reduction technology or a combination of technologies other than an SCR project for Unit 6 is identified as appropriate, Gulf Power Company will implement the technology or combination of technologies on one or more of the three remaining coal-fired units by May 1, 2006. If an SCR project for Unit 6 is identified as the appropriate NO_x reduction technology, Gulf Power Company will implement, begin and continue operating the SCR system by December 31, 2007. [Paragraph 2 of the Agreement]}

SECTION 4. APPENDICES
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Appendix CF. Citation Format
Appendix GC. General Conditions
Appendix SC. Standard Conditions

SECTION 4. APPENDIX CF
CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Air 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
“001” identifies the specific permit project
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to 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

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

Agreement

On August 28, 2002, Gulf Power Company and the Florida Department of Environmental Protection entered into an agreement titled, “Agreement for the Purpose of Ensuring Compliance with the Ozone Ambient Air Quality Standards”. Throughout the permit, this is cited as the “Agreement”.

SECTION 4. APPENDIX GC

GENERAL CONDITIONS

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

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

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

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

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

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

SECTION 4. APPENDIX GC
GENERAL CONDITIONS

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable 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 or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX SC
STANDARD CONDITIONS

{Permitting Note: Unless otherwise specified by permit or rule, the following conditions apply to all emissions units and activities at this 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 62-4.130, 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 Allowed:** Unless otherwise specified in the permit, excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. **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.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program 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.]
6. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
7. **General Visible Emissions:** Unless otherwise specified in the permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. [Rule 62-296.320(4)(b)1, F.A.C.]
8. **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.]

TESTING REQUIREMENTS

9. **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.]
10. **Operating Rate During Testing:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted

SECTION 4. APPENDIX SC
STANDARD CONDITIONS

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. [Rule 62-297.310(2), F.A.C.]

11. 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.]
12. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. *Required Sampling Time*. 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. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - 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.
 - 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.

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

13. 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.]

14. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
15. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
16. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
17. Test Reports: 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. 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. 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:

SECTION 4. APPENDIX SC
STANDARD CONDITIONS

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 are 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 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.]

RECORDS AND REPORTS

18. 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 five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
19. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

P.E. CERTIFICATION STATEMENT

PERMITTEE

Gulf Power Company
One Energy Place
Pensacola, FL 32520-0328

Draft Air Permit No. 0330045-005-AC
Crist Electrical Generating Plant
Unit 7 ESP/SCR Pollution Control Project

PROJECT DESCRIPTION

On August 28, 2002, Gulf Power Company and the Florida Department of Environmental Protection entered into an agreement titled, "Agreement for the Purpose of Ensuring Compliance with the Ozone Ambient Air Quality Standards" (Ozone Agreement). The application under review is based on the pollution control projects for Unit 7 as discussed in the agreement. Gulf Power Company proposes to install a new selective catalytic reduction (SCR) system on Unit 7 at the existing Crist Electrical Generating Plant. At 85% NOx conversion efficiency, the SCR system is expected to reduce actual emissions of nitrogen oxides by as much as 5000 tons per year. Gulf Power Company also proposes to replace the existing electrostatic precipitator (ESP) with a new ESP designed for 99.64% removal efficiency, which is needed to structurally accommodate the new SCR system. In accordance with Rule 62-212.400(2)(a)2, F.A.C. and EPA's definition of "modification" in 40 CFR 52.21(b)(2)(iii)(h), the pollution control project is exempt from PSD preconstruction review.

The electrostatic precipitator (ESP) is being designed by Alstom Power Inc., a company with over 70 years of experience in environmental control and a leading supplier of ESPs. Southern Company Services, Inc. will design and install the SCR system. With a 1990s demonstration project at the Crist Plant, Southern Company Services developed early data for retrofitting SCR on boilers firing high-sulfur U.S. coal. In addition, Southern Company Services recently completed the design and installation of twelve SCR systems for five power plants in the Atlanta and Birmingham metropolitan areas. Based on the preliminary design specifications for the ESP and SCR, Gulf Power Company provided reasonable assurance that the pollution control project is capable of complying with the requirements and intent of the Ozone Agreement and applicable air pollution control regulations.

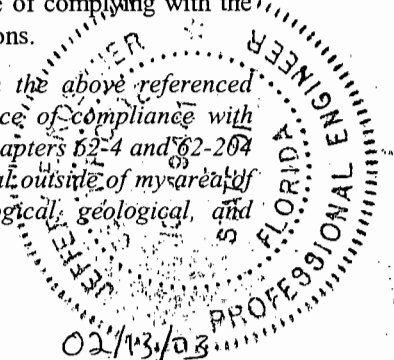
I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters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

Jeffery F. Koerner

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

02/13/03

(Date)



Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Chief *copy for TLV*
Bureau of Air Regulation

THROUGH: Al Linero, Manager *AL*
New Source Review Section

FROM: Jeff Koerner, New Source Review Section *JK*

DATE: February 13, 2003

SUBJECT: Draft Air Construction Permit No. 0330045-005-AC
Gulf Power Company, Crist Electrical Generating Plant
Unit 7 ESP/SCR Pollution Control Project

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- P.E. Certification

The draft permit authorizes the replacement of the existing electrostatic precipitator and installation of a new selective catalytic reduction system for Unit 7 at the existing Crist Electric Generating Plant in Pensacola, Florida. The pollution control equipment was contemplated in an August 2002 agreement with the Department titled, "Agreement for the Purpose of Ensuring Compliance with the Ozone Ambient Air Quality Standards". In accordance with Rule 62-212.400(2)(a)2, F.A.C. and EPA's definition of "modification" in 40 CFR 52.21(b)(2)(iii)(h), the pollution control project is exempt from PSD preconstruction review.

The Technical Evaluation and Preliminary Determination provides a detailed description of the project, rule applicability, and emissions standards. The P.E. certification briefly summarizes the proposed project. Day #74 is April 24, 2003. I recommend your approval of the attached Draft Permit for this project.

Attachments

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

Certified Mail



February 6, 2003

Jeffrey F. Koerner
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

RECEIVED

FEB 10 2003

BUREAU OF AIR REGULATION

Dear Mr. Koerner:

RE: CRIST ELECTRIC GENERATING PLANT
REQUEST FOR ADDITIONAL INFORMATION RESPONSE
UNIT # 7 ESP & SCR Project No: 0330045-005-AC

Please find enclosed Gulf Power's response to FDEP's request for additional information outlined in your letter to Gene L. Ussery, Jr. dated January 22, 2003. Included are new certifications from the Responsible Official and Professional Engineer registered in Florida.

As you are aware, Gulf Power's schedule to begin construction starts on March 3, 2003. Please advise Gulf Power as soon as possible any delay to this schedule. Gulf Power must start foundation work on March 3, 2003 in order to meet the schedule outlined in the August FDEP Ozone Agreement.

We appreciate your efforts to work with us regarding the startup of these emission control systems. Please call me regarding any additional questions or concerns.

Sincerely,

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

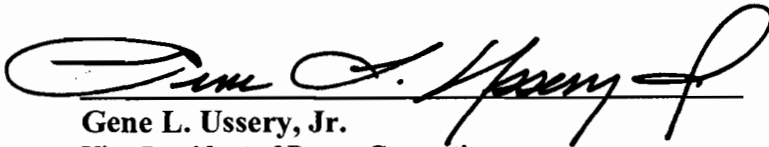
G. Dwain Waters, Q.E.P.
Air Quality Programs Supervisor

cc: w/att: Jim. Vick, Gulf Power Company
Wright, Terry, Gulf Power Company
John Dominey, Gulf Power Company
Robin B. Hurst, Southern Company Services
Gary Perko, Hopping, Green & Sams
Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida

CERTIFICATION BY RESPONSIBLE OFFICIAL

"I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Title V source for which this request is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this request are true, accurate and complete."

Responsible Official Signature:



Gene L. Ussery, Jr.
Vice-President of Power Generation

2-5-03
Date:

RECEIVED

FEB 10 2003

BUREAU OF AIR REGULATION

**CRIST ELECTRIC GENERATING PLANT
Unit # 7 ESP & SCR CONSTRUCTION PERMIT
CERTIFICATION BY PROFESSIONAL ENGINEER**

“I, the undersigned, am a registered professional engineer in the State of Florida and hereby certify to the best of my knowledge that all information for the construction and design of the Unit # 7 Electrostatic Precipitator and Selective Catalytic Reduction System at the Crist Electric Generating Plant is true, accurate and complete.”

Professional Engineer Signature:



**Gregory N. Perry
Registration Number: 52786**

2-5-03

Date

RECEIVED

FEB 10 2003

BUREAU OF AIR REGULATION

**GULF POWER'S RESPONSE TO FDEP'S REQUEST FOR
ADDITIONAL INFORMATION DATED JANUARY 22, 2003
UNIT 7 ESP/SCR PROJECT - Project No: 0330045-005-AC**

Gulf Power Response: February 4, 2003

1. **Process Flow Diagram:** Provide a process flow diagram of the entire system (boiler through stack) identifying the process and control equipment, flue gas fans, fuel inputs, CEMS monitoring points, ammonia injection point, bypass damper locations, and ash removal. Identify the approximate exhaust flows, temperatures, and pressure drop for each major component and for any substantial change in these parameters. Will the existing stacks or CEMS be modified due to this project?

Gulf Power Answer:

See the attached process flow diagram Figure 1. The mass balances, Figures 2A, 2B and 2C, that follow provide the requested flows, temperatures and pressures at each major component. The CEMS will be modified as follows:

The existing Continuous Emission Monitoring System (CEMS) will be modified by Spectrum Systems, Inc. for proper operation with the retrofitted SCR. The existing NO_x monitor will be replaced with a dual range model. A low range will be necessary when the SCR is in operation and the existing high range will be needed when the SCR is out of service. However, there will be no change in location of the Crist 7 CEM system. The stack probe and duct locations will remain the same as currently noted in the CEM monitoring plan.

In addition to changing the NO_x monitor to a dual range monitor, additional calibration gas cylinders, solenoid valves, and control hardware and logic will be required to provide for automatic zero and calibration of each monitor range. Data Acquisition & Handling System (DAHS) modifications will also be required for the electronic documentation associated with dual range analyzers.

Since the expected amount of ammonia at the compliance location is very low, the existing dilution probe and sampling system should be acceptable for use as is. A chemical ammonia scrubber will be installed in the sample line to prevent any ammonia from being seen as NO_x by the NO_x monitor. The ammonia scrubber will be selected so that a visual inspection can be used to determine when it has been spent.

The CEMS will also be modified to compensate all measurements for changes in temperature, pressure, and molecular weight using the Electric Power Research Institute (EPRI) dilution probe correction algorithm. This will require a modification to be made to the existing dilution probe, addition of pressure and temperature sensors, and modifications to existing DAHS. The EPRI correction algorithm will result in a more accurate determination of heat input and thus a more accurate determination of lb/mmBtu of NO_x being emitted.\

Note that new SCR inlet/outlet NO_x monitors are being furnished for ammonia feed control purposes only (see the response to #3). Also, the other remaining CEMS (flow, SO₂, diluent) parameters and equipment are not expected to require any changes.

2. **ESP:** Provide a general description of the ESP proposed for this project (number of chambers, number of fields, etc.). Identify the following ESP design parameters: reported collection efficiency (%); reported drift velocity of particles (ft/second); and the reported collection plate area (ft²). What is the design outlet particulate matter emission rate in terms of “lb/MMBtu of heat input” and “opacity”? Describe any flue gas conditioning that will be used to lower fly ash resistivity and any monitoring associated with this parameter. Identify the general components and operation of the system that will be used to remove particles from the collecting plates. Describe ash collection and removal including the control system used to adjust the cleaning frequency and intensity. Will the construction of the new ESP change the current methods, frequency, or duration of soot blowing for Unit 7? Please describe.

Gulf Power Answer:

- a. *Provide a general description of the ESP proposed for this project (number of chambers, number of fields, etc.).* The precipitator will consist of two casings (or gas tight chambers). Each casing will have three cells with five fields per cell. The precipitator will have 30 total fields (or electrical bus sections) with each field having approximate overall dimensions of 28.88' wide x 11.81' deep and a height of 49.22'. The collecting plates will be 16 gage steel with a spacing of 15.75 inches. Discharge electrodes will be of the rigid design. Each electrical bus section (30 total) will be controlled by a microprocessor based controller with field energizing optimization and high speed field bus communication. The ESP will also be equipped with a data management system for remote control and communications with the high voltage power supplies and rapper control systems.
- b. *Identify the following ESP design parameters: reported collection efficiency (%); the predicted collection efficiency is 99.64%; reported drift velocity of particles (ft/second); no migration velocity value was provided by the manufacturer; and the reported collection plate area (ft²) total collection area is 767,326 ft².*
- c. *What is the design outlet particulate matter emission rate in terms of “lb/MMBtu of heat input” and “opacity”?* The total installation is designed to meet a maximum particulate emission limitation of 0.05 pounds per million Btu heat input and also an opacity limitation of 10 percent maximum.
- d. *Describe any flue gas conditioning that will be used to lower fly ash resistivity and any monitoring associated with this parameter.* No flue gas conditioning will be required. The existing sulfur burner will be removed.
- e. *Identify the general components and operation of the system that will be used to remove particles from the collecting plates.* A tumbling hammer rapping system will be used to strike the collecting plates. Rapping density will not exceed 1,163 square feet of collecting electrode per rapper. The rappers are rotated with a motor that will be operated at a frequency to minimize opacity spikes. Sixty hoppers (two per field) will hold the collected ash.
- f. *Describe ash collection and removal including the control system used to adjust the cleaning frequency and intensity.* The new ESP's ash collection hoppers will be tied in to the existing dry fly ash removal system. Since the ash collection will be similar to the existing ESP, no significant changes for capacity are required. Modifications will be made to extend the transport piping and increase the transport performance as necessary. The final design of the control system for the ash hopper valves is not finished, but the

current concept is to use the existing control system. Some of the new ductwork will add some air heater outlet hoppers. Also with the addition of the SCR one year later, some new ash collection hoppers at the bottom of the SCR inlet will be added. Engineering evaluations are on-going to determine the removal of the ash from these new hoppers that may change or add to the ash collection system.

- g. *Will the construction of the new ESP change the current methods, frequency, or duration of soot blowing for Unit 7?* No changes are expected in boiler or air heater sootblowing methods, frequency or duration due to the new ESP.

3. **Selective Catalytic Reduction (SCR) System:** Identify the following SCR design parameters: general catalyst composition (material); catalyst structure (honeycomb, plate, etc.); approximate catalyst volume (ft³); catalyst operational temperature range (° F); molar ratio of ammonia/NO_x; and design inlet and outlet NO_x emission rates (lb/MMBtu). Describe the ammonia distribution, flow control, and monitoring systems. What are the general procedures for startup and shutdown of the SCR system? What critical operating parameters and levels must be attained before commencing ammonia injection? Explain how the control system will monitor, adjust, and inject ammonia at a given rate. What are the estimated ammonia injection rates at 50%, 75%, and 100% of the maximum coal-firing rate? What is the target ammonia slip level based on the design criteria of 85% NO_x reduction? Describe the design and operating techniques used to prevent particulate matter from fouling and masking the catalyst beds. Provide the catalyst vendor's recommendations describing catalyst maintenance procedures and schedule. In response to catalyst deactivation, describe the process of gradually adding catalyst through complete replacement.

Gulf Power Answer:

SCR System Design Parameters:

- a. General Catalyst Composition: The catalyst will be of Titanium Dioxide and Molybdenum Oxide with Vanadium Pentoxide as the active component. The catalyst is fabricated by applying ceramic catalyst material to a perforated stainless steel mesh grid plate.
- b. Catalyst Structure: Plate type with 5.7mm pitch arranged in 4 layers.
- c. Approximate catalyst volume: 736 cubic meters (25,988 cubic feet) initially in 2 ½ layers, 1177 cubic meters (41,559 cubic feet) with all four layers populated.
- d. Catalyst Operational Temperature Range: ~600 – 800°F
- e. Molar ratio of Ammonia / NO_x: 0.95 at SCR inlet (for 90% NO_x removal)
- f. Design inlet NO_x Concentration: 0.70 lb/mmBtu
- g. Design outlet NO_x emissions: 0.07 lb/mmBtu
- h. *Describe the ammonia distribution, flow control and monitoring systems.*

Ammonia flow control and flow monitoring is discussed under paragraph k below. There are no provisions for continuously monitoring ammonia concentration in the flue gas. When ammonia measurements in the flue gas are required, a wet chemical method will be utilized. These measurements are taken periodically over the operating life of the SCR catalyst. More frequent tracking of ammonia slip will be monitored by measuring the amount of ammonia

adsorbed by the flyash. Flyash samples will be measured periodically using an ion-specific electrode.

Ammonia is distributed into the SCR inlet duct through the Ammonia Injection Grid (AIG). The AIG is divided into multiple zones (perhaps 2 dozen zones, pending the upcoming model study results). Each zone is equipped with a flow indicator and manual control valve for tuning the AIG to match the inlet NO_x profile.

During commissioning and periodically over the life of the plant, it is necessary to tune the ammonia injection grid. This tuning optimizes the distribution of ammonia in the inlet duct relative to the NO_x distribution so that maximum deNO_x efficiency can be achieved with minimum ammonia slip. To facilitate this tuning, a manual gas sampling grid (GSG) is installed downstream of the last catalyst layer. The GSG allows a high-resolution traverse for gas composition across the outlet of the SCR, which can be used to precisely adjust the AIG. The GSG is comprised of individual small-bore (~1/2") heavy-wall pipes extending from outside the SCR to distributed sampling locations below the last catalyst layer. Portable equipment is used to sample and measure gas concentrations via the GSG.

Effective performance of the AIG to distribute ammonia relative to NO_x is dependent on the velocity profile entering the AIG. A static mixing device, consisting of steel plates installed at opposing angles, is used to create flow resistance and flatten this profile and make gas flow more uniform. This static device is designed by the catalyst supplier as part of the physical model study. It is installed upstream of the AIG.

A second static mixer is installed downstream of the AIG. The elements of this mixer are precisely oriented with the AIG injection points to impart a swirl to the diluted ammonia and promote good mixing with the flue gas. Ammonia will be stored on site in two 20,500 gallons tanks.

i. What are the general procedures for startup and shutdown of the SCR system?

SCR Startup Procedure: The SCR dampers will initially be in the Bypass position. The boiler should reach a minimum load of approximately 220MW with stable firing on coal. The unit may be at any other load up to maximum, but load should be steady while the SCR is valved into the flue gas path.

The SCR outlet dampers are stroked in tandem to the full open position and pinned in place. The continuous cleaning sequence of the sonic horns is activated. Dilution air flow to the AIG is initiated to preclude flue gas or flyash accumulation in the AIG. The SCR bypass damper is then slowly opened (to SCR in-service position) over a period of hours to heat the SCR reactor in a controlled manner while avoiding any upset to the furnace draft controls. The limiting constraint on thermal ramp rate is differential temperature, which must be no greater than 150°F [preliminary] between the internal structural members and stiffeners on the external skin of the reactor. The reactor is heated as quickly as possible within this constraint to minimize the transition time through the moisture and sulfuric acid dewpoints. It takes from 12 to 14 hours to open the dampers the first time the SCR is put in service, in part because moisture is driven off of the insulation in the process. Thereafter, the heat-up procedure may take 8 to 12 hours.

When the damper is fully opened (all of gas flow is through the SCR reactor) the boiler load may be dispatched as required. An FGAS sample fan is started and the SCR inlet and outlet NO_x concentration monitors are verified to agree with the stack CEMS. The bypass damper seal air pressure and flow are verified to assure 0% bypass. Ammonia injection may begin when the SCR catalyst reaches the minimum operating temperature of 600°F. If the boiler is at full load and the gas flow is at 100% of the design rate, the catalyst performance is still temperature limited. At 600°F the catalyst activity is sufficient to provide only 75% NO_x reduction efficiency (as opposed to 90% at design temperature of 680°F). The ammonia flow rate should be limited to 80% of the flow rate at design conditions. When the catalyst reaches the design temperature (680°F) the ammonia flow can be increased to achieve 90% NO_x removal.

Alternately the SCR may be in the flue gas path in while the unit undergoes a hot or cold start. The same reactor differential temperature constraints and minimum ammonia injection temperature applies. The catalyst is exposed to soot because the burners are not optimized for the #2 fuel oil used as a startup fuel. The unburned hydrocarbons from the fuel oil may block the catalyst pores and reduce the catalyst life. However, most deposits are expected to occur on the thin layer of flyash on the catalyst surfaces. At this time we do not know if the boiler or SCR will be the limiting constraint on startup time.

SCR Shutdown Procedure: The ammonia injection is stopped and a delay time (<1 hour) is allowed for the outlet NO_x concentration to rise to equal the inlet concentration. This period of gas flow without ammonia injection assures that all residual ammonia is consumed and provides the NFPA 8502 purge requirement.

If the outage is expected to be short, the SCR inlet/bypass damper is stroked to the full bypass position in a controlled manner to avoid any furnace draft upset. The SCR outlet damper is then closed and seal air flow is established at both dampers. Operation of the sonic horns, FGAS sample fan and dilution air flow may then be halted. The SCR catalyst is thus 'bottled up' hot and will remain above the acid dewpoint for a considerable length of time because the reactor is well insulated. This procedure allows the boiler to be cooled more quickly because the SCR reactor is required to be cooled. It also allows the SCR to be put back in service in much less time than for the gradual warm-up from a cold start.

If a long outage is expected or if access to the inside of the reactor is required, the SCR dampers are kept open as the boiler is brought off-line in the normal fashion. After fuel flow is discontinued, the ID and FD fans are left running to cool the boiler and SCR. The cooling time will be extended by up to 12 hours due to the thermal capacity of the SCR. The reactor should be isolated during any maintenance procedure that could subject the catalyst to excessive moisture, such as air preheater washing or economizer maintenance.

- j. *What critical operating parameters and levels must be attained before commencing ammonia injection?*

The following permissives must be met before ammonia may be injected to the SCR:

- No unit Master Fuel Trip
- SCR inlet and outlet dampers are fully opened
- Catalyst at or above minimum operating temperature (~600F)
- Ammonia / dilution air ratio is not high (>10% by volume)
- Dilution air flow is not low
- Gaseous ammonia is above the minimum vaporizer outlet temperature

- k. *Explain how the control system will monitor, adjust, and inject ammonia at a given rate.*

An ammonia flow control valve (FCV) controls the flow of undiluted anhydrous ammonia vapor from the operating vaporizer into the diluted ammonia stream via a mixing chamber. The flow control valve setpoint for the SCR reactor is established by an algorithm computation as depicted in Figure 3.

The ammonia flow control loop in the DCS uses a cascaded-feedforward control scheme. The lower controller in this scheme is a simple ammonia flow controller. The upper controller and its feedforward signal develop the ammonia flow setpoint. This setpoint is compared to the measured ammonia flow (measured flow is compensated for temperature and pressure) and the output, when in automatic, is adjusted accordingly. This output signal adjusts the ammonia flow control valve. The feedforward signal is generated from the measured SCR inlet NO_x , the outlet NO_x setpoint, and the heat input to the boiler, which is estimated from the measured megawatt output of the steam turbine. The multiplication of the two signals, and the scaling factor, is used to determine the flow of ammonia (in units of lbs/hr) required for the current flow rate of NO_x into the SCR.

The upper controller of the cascaded control loop compares the SCR outlet NO_x to the preset NO_x setpoint and then trims the feedforward signal to adjust for any inaccuracies in the other measurements and for any ammonia slip that actually occurred. The stack NO_x signal is also monitored since it is the measurement that is used to determine compliance with the air permit limits.

The scaling factor for the ammonia flow feedforward signal (0.39) is based upon the differences in molecular weight between one molecule of NO_x and one molecule of ammonia. This calculation assumes that 95% of the NO_x will be NO and 5% of it will be NO_2 . It also assumes that all of the ammonia molecules find NO_x to react with and that there is no unreacted ammonia.

- l. *What are the estimated ammonia injection rates at 50%, 75%, and 100% of the maximum coal-firing rate?*
- The ammonia injection rate is 1319 lb/hr at Peak Maximum conditions.
 - The ammonia injection rate is 1000 lb/hr at 75% of maximum conditions.
 - The ammonia injection rate is 785 lb/hr at the minimum load for NH₃ injection.
 - The ammonia injection rate would be 695 lb/hr at 50% load (250MW) however we expect the SCR to limit low-load operation to a minimum load of about 275MW. Below the load, the economizer outlet temperature may not meet the minimum 600°F required for ammonia injection.

- m. *What is the target ammonia slip level based on the design criteria of 85% NO_x reduction?*

The target ammonia slip level is less than 5ppm measured at the stack.

- n. *Describe the design and operating techniques used to prevent particulate matter from fouling and masking the catalyst beds.*

Large “popcorn” ash particles have the potential to plug the protective screens on catalyst modules and may even plug the catalyst elements themselves. This pluggage leads to poor gas distribution within the SCR, higher draft loss across the SCR and a reduction in catalyst life. Large (>4mm diameter) particles must be collected before they reach the catalyst. Flyash particles must be kept moving through the catalyst and not allowed to accumulate.

Flow model studies of the SCR system are being conducted using both numerical and experimental methods. The numerical method uses computational fluid dynamics (CFD) to predict flow patterns and particle behavior throughout the system. The experimental method includes a 1/12th scale model of the SCR system. Fans force air to flow through the model at velocities selected for similitude across the operating range of the full scale reactor. Gas flow patterns in the model are observed using smoke, tracer gas and tufts of yarn. Areas of ash deposition are observed using cork dust to simulate flyash. Gas flow distribution devices and popcorn ash collection devices are developed and tested.

The SCR inlet duct is designed to facilitate collection and removal of large ash particles. The 90 degree bend upward from the economizer outlet duct provides the change of flow direction necessary for momentum-based devices such as deflector plates. The large cross-sectional area is sized for low velocity (35 feet/second) with upward vertical flow. This allows particle screens to be used with minimal abrasion and draft loss. Devices of these types will be tested and proven as part of the flow model study.

Acoustic cleaning devices are provided for on-line cleaning of flyash from the catalyst and reactor surfaces. The SCR reactors are equipped with 8 sonic horns per catalyst elevation to prevent ash accumulation. These horns operate in the audible sound range and prevent ash deposits by semi-continuously vibrating or fluidizing ash particles. The fluidized particles pass through the SCR under the

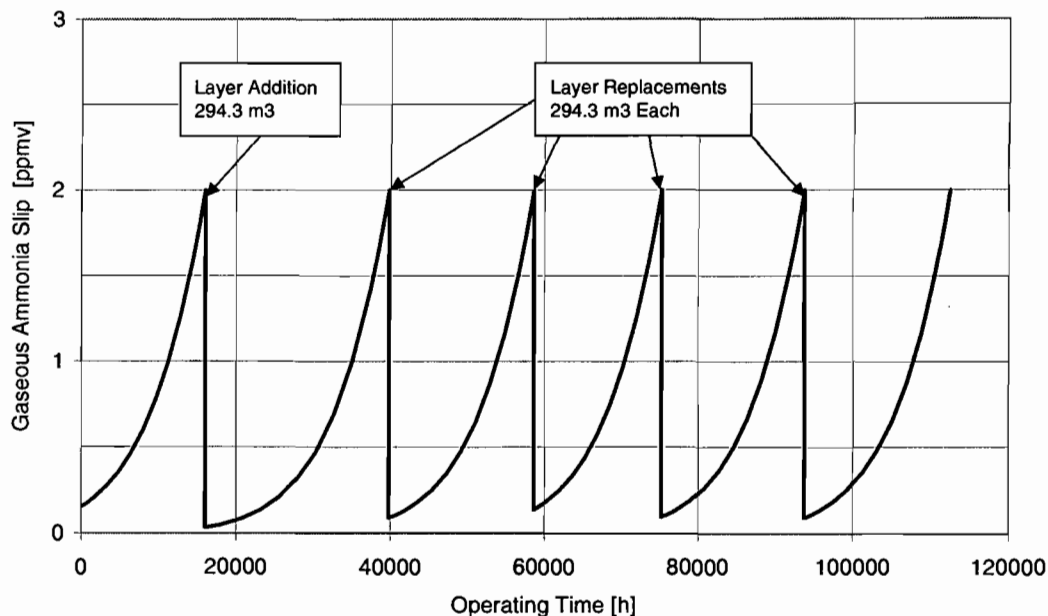
force of flue gas flow and gravity. The compressed air system that supplies the sonic horns will be sized to allow for additional horns which may be added in the SCR inlet area to prevent ash deposits on turning vanes, beams, collection devices, etc.

- o. *Provide the catalyst vendor's recommendations describing catalyst maintenance procedures and schedule. In response to catalyst deactivation, describe the process of gradually adding catalyst through complete replacement.*

The catalyst has been selected for a 16,000-hour life at design conditions. The initial catalyst load consists of two and a half layers. At the end of the first 16,000 hour period a full fourth layer is added. After the next interval (at 40,000 hours), the half-layer is replaced with a full layer. Full layers are replaced in succession thereafter similar to the catalyst management plan shown below.

Please note that this recommended schedule has not yet been met at any operating SCR system within the Southern Company.

Catalyst Management Plan
Crist 7: 2 1/2 layers, 735.8 m3 Initial Installation



4. **SCR Bypass Duct:** Describe the general location and operation of the proposed SCR bypass duct. Under what conditions is it necessary to use the bypass? For each condition, estimate the duration of bypass operation and the number of times per year the bypass is expected to operate under the condition. Is Gulf Power requesting any specific permit conditions related to bypass operation? Please provide supporting documentation for any requests.

Gulf Power Answer:

- a. *Describe the general location and operation of the proposed SCR bypass duct.* The SCR bypass duct is configured to allow boiler exhaust gas to bypass the SCR catalyst. Initial design locates it so the bypass inlet is at

the top of the SCR box and the outlet is at the bottom of the SCR box. Two large bypass dampers re-direct the gas flow through this duct. See EPS-3016-281. For a general understanding of bypass issues, two conditions pertaining to the SCR should be understood. First, the SCR reaction takes high temperatures for the chemical reaction to occur. These temperatures, around 600 degrees F, do not exist until the unit is loaded to approximately 275 MW. Second, a cold SCR must be gradually warmed to control thermal expansion.

b. *Under what conditions is it necessary to use the bypass?* Three conditions are anticipated that require bypass duct operation.

1. Boiler problems requiring personnel entry into the boiler for maintenance: By closing the by-pass dampers in this situation, the SCR remains thermally isolated and warm while the boiler is cooled for entry. By keeping the SCR warm, the SCR can be returned to operation much faster.

2. Starting up the unit: The SCR typically would require a longer startup time without bypassing. With bypassing, the boiler can come to the SCR's operating temperature faster and the bypass dampers can be opened gradually for controlled SCR warming.

3. SCR catalyst problems, such as plugging, would require maintenance and inspections on the SCR itself. The bypass would be used to allow entry and work on the SCR itself without taking the unit off-line.

c. *For each condition, estimate the duration of bypass operation and the number of times per year the bypass is expected to operate under the condition.*

1. Boiler Problems- occur an estimated 10 to 12 times per year for a bypass time of approximately 60 hours. Note the unit is off line approximately 36 of these hours.

2. Start Up other than boiler problems- about 10 times per year for a bypass time of approximately 48 hours.

3. SCR catalyst problems – These events on other units range from 4 days to 2 weeks in duration and would be expected to occur about 3-4 times per year on a unit operated with SCR year-round.

d. *Is Gulf Power requesting any specific permit conditions related to bypass operation? Please provide supporting documentation for any requests.*

Gulf Power believes operations during periods of startup, shutdown and malfunction do not constitute representative conditions for the purpose of performance testing and are exempt as excess emissions. Thus, the SCR bypass should be authorized for unit startup and shutdown including boiler and SCR maintenance as periods of malfunction. Gulf Power requests that bypass operation for boiler and SCR maintenance be permitted for 15 days during 2005 and up to 15 days per calendar year thereafter. During bypass operations the NOx emissions limit should be a 24 hour average at 0.35 lb/mmbtu from Crist Unit 7. These periods should not be included in the 30 day emission average for NOx. on a

daily average basis during those days. The proposed 0.35 lb/mmbtu limit is based on past actual operating data for Crist Unit 7 and is included as "Attachment A."

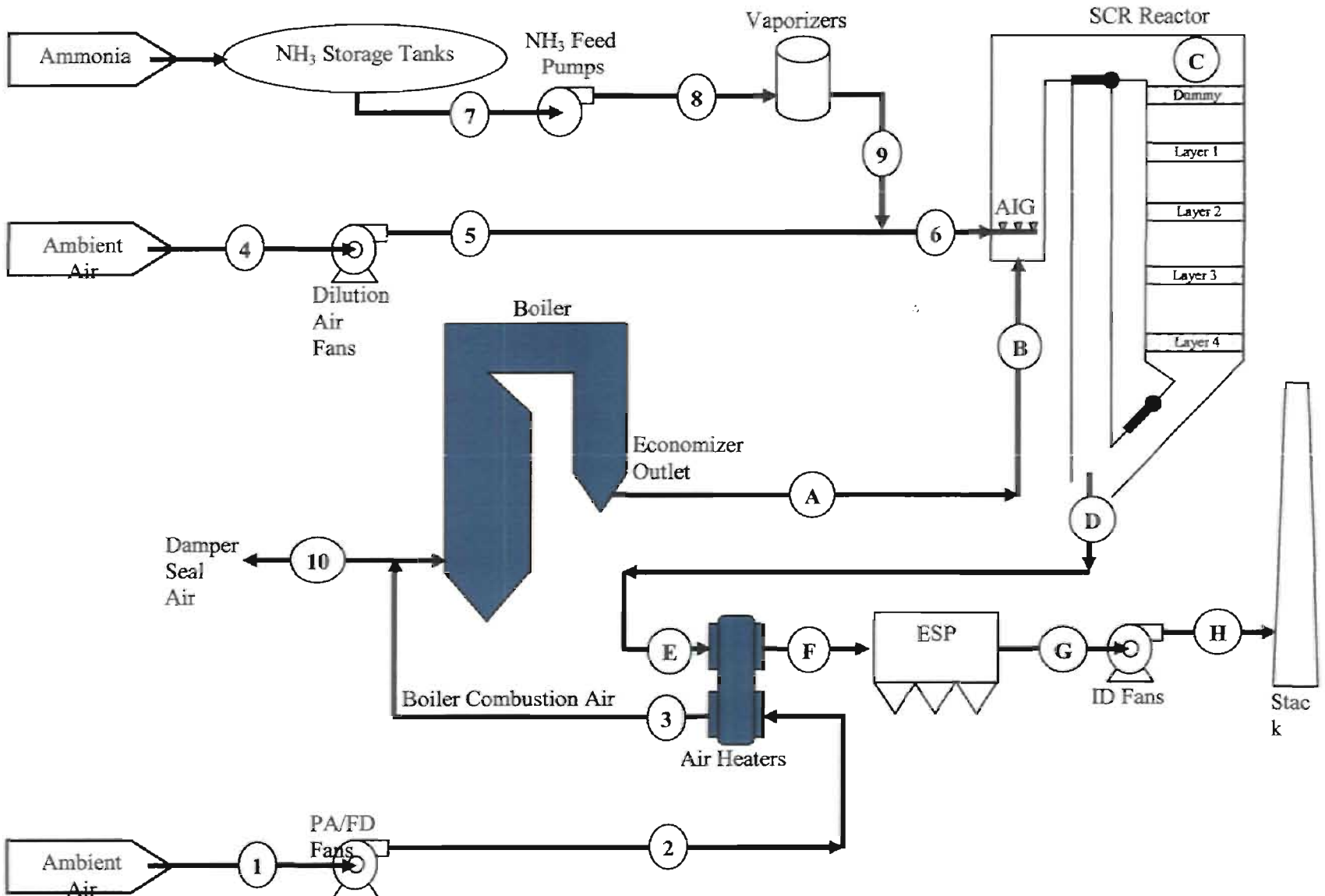
5. **Schedule**: Provide an updated project construction schedule similar to that shown in "Exhibit A" of the Gulf Power/DEP agreement.

Gulf Power Answer:


See "Attachment B" summary schedules for the precipitator and the SCR. Note this schedule is the current plan and is subject to revision to accommodate unit outage scheduling, fabrication and delivery of components and actual construction activities.

FIGURES

SCR SYSTEM PROCESS FLOW DIAGRAM – FIGURE 1



PEAK LOAD MASS AND ENERGY BALANCES – FIGURE 2A


		Gulf Power Company Plant Crist, Unit 7 PROCESS STREAM DETAILS								Date: 1/17/2003 Revision: A Case: Peak Max. Page: 1 Document No.:	
		STREAM	A	B	C	D	E	F	G	H	
		Economizer Outlet	AIG Inlet	SCR Inlet	SCR Outlet	APH Gas Inlet	APH Gas Outlet	ID Fan Inlet	ID Fan Outlet		
Temperature, F		725	724	720	719	719	320	310	317		
Pressure, in. w.g.		-12.0	-12.7	-14.7	-17.2	-17.4	-27.8	-29.8	2.0		
Pressure, in.w.a.		392.2	391.5	389.5	387.0	386.8	376.4	374.4	406.2		
Gas Flow, acfm		2,654,195	2,689,423	2,716,585	2,731,817	2,736,702	2,167,106	2,258,288	2,101,242		
Gas Flow, scfm		1,140,194	1,154,239	1,163,872	1,163,872	1,165,351	1,357,350	1,425,218	1,425,218		
Gas Flow, lb/hr		5,221,663	5,227,141	5,270,767	5,270,767	5,277,463	6,146,959	6,454,307	6,454,307		
NOx, lb/hr (as NO2)		3,762	3,762	3,762	376	376	376	376	376		
Particulate, lb/hr		26,134	26,134	26,134	26,134	26133.7	26,134	131	131		

STREAM	1	2	3	4	5	6	7	8	9	10
	FD Fan Inlet	FD Fan Outlet	APH Air Outlet	Dilution Air Fan Inlet	Dilution Air Fan Outlet	AIG Feed	Ammonia Feed Pump Suction	Ammonia Feed Pump Discharge	Regulated Ammonia Flow	Damper Seal Air from Secondary
Temperature, F	75	76	550	75	77	77	75	75	40	550
Pressure, in. w.g.	-1.0	16.4	7.0	-1.0	40.0	30.0	-	-	25.0	-4.0
Pressure, in.w.a.	403.2	420.6	411.2	403.2	444.2	434.2	-	-	429.2	400.2
Gas Flow, acfm	1,326,771	1,274,049	2,087,612	9,684	8,824	9,309	-	-	447	5,300
Gas Flow, scfm	1,297,834	1,297,834	1,103,159	9,472	9,472	9,768	-	-	499	2,816
Gas Flow, lb/hr	5,796,641	5,796,641	4,927,145	42,307	42,307	43,626	1,319	1,319	1,319	12,174
Pressure, psig	-	-	-	-	-	-	125	125	-	-

NOTES:

- All flows are total for one boiler unit.
- Standard conditions are based on 68 deg. F and 29.921 in.Hg.
- Air to sonic horns and bypass due to FGAS sampling is neglected.
- Flows streams exclude equipment sizing margins.

NORMAL MAX LOAD MASS AND ENERGY BALANCES – FIGURE 2B

 <p>SOUTHERN COMPANY <i>Energy to Serve Your World™</i></p>	<p>Gulf Power Company Plant Crist Unit 7</p> <p>PROCESS STREAM DETAILS</p>	<p>Date: 1/17/2003 Revision: A Case: Normal Max. Page: 2 Document No.:</p>
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STREAM	A	B	C	D	E	F	G	H		
	Economizer Outlet	AIG Inlet	SCR Inlet	SCR Outlet	APH Gas Inlet	APH Gas Outlet	ID Fan Inlet	ID Fan Outlet		
Temperature, F	725	724	720	719	719	240	230	234		
Pressure, in. w.g.	-10.0	-10.6	-12.2	-14.3	-14.5	-23.1	-24.8	0.0		
Pressure, in. w.a.	394.2	393.6	392.0	389.9	389.7	381.1	379.4	404.2		
Gas Flow, acfm	2,408,482	2,440,264	2,464,625	2,475,671	2,480,568	1,754,182	1,823,540	1,722,044		
Gas Flow, scfm	1,039,916	1,052,971	1,062,577	1,062,577	1,064,225	1,239,433	1,301,405	1,301,405		
Gas Flow, lb/hr	4,762,428	4,768,532	4,812,037	4,812,037	4,819,498	5,612,957	5,893,605	5,893,605		
NOx, lb/hr (as NO2)	3,414	3,414	3,414	341	341	341	341	341		
Particulate, lb/hr	23,835	23,835	23,835	23,835	23,835	23,835	119	119		

STREAM	1	2	3	4	5	6	7	8	9	10
	FD Fan Inlet	FD Fan Outlet	APH Air Outlet	Dilution Air Fan Inlet	Dilution Air Fan Outlet	AIG Feed	Ammonia Feed Pump Suction	Ammonia Feed Pump Discharge	Regulated Ammonia Flow	Damper Seal Air from Secondary
Temperature, F	75	76	460	75	77	77	75	75	40	460
Pressure, in. w.g.	-0.4	13.0	7.0	-1.0	40.0	30.0	-	-	25.0	2.0
Pressure, in. w.a.	403.8	417.2	411.2	403.2	444.2	434.2	-	-	429.2	406.2
Gas Flow, acfm	1,208,946	1,171,654	1,735,295	9,684	8,824	9,283	-	-	406	5,300
Gas Flow, scfm	1,184,339	1,184,339	1,006,688	9,472	9,472	9,740	-	-	452	3,046
Gas Flow, lb/hr	5,289,729	5,289,729	4,496,270	42,307	42,307	43,504	1,197	1,197	1,197	13,566
Pressure, psig	-	-	-	-	-	-	125	125	-	-

NOTES:

1. All flows are total for one boiler unit.
2. Standard conditions are based on 68 deg. F and 29.921 in.Hg.
3. Air to sonic horns and bypass due to FGAS sampling is neglected.
4. Flows streams exclude equipment sizing margins.

LOW LOAD MASS AND ENERGY BALANCES – FIGURE 2C

 SOUTHERN COMPANY <i>Energy to Secure Your World™</i>	Gulf Power Company Plant Crist, Unit 7 PROCESS STREAM DETAILS								Date: 1/17/2003 Revision: A Case: Min. NH3 Inj. Page: 3 Document No.:	
STREAM	A	B	C	D	E	F	G	H		
	Economizer Outlet	AIG Inlet	SCR Inlet	SCR Outlet	APH Gas Inlet	APH Gas Outlet	ID Fan Inlet	ID Fan Outlet		
Temperature, F	600	599	595	594	594	230	220	222		
Pressure, in. w.g.	-7.0	-7.2	-8.0	-8.8	-8.9	-12.6	-13.3	0.0		
Pressure, in.w.a.	397.2	397.0	396.2	395.4	395.3	391.6	390.9	404.2		
Gas Flow, acfm	1,395,907	1,412,288	1,428,965	1,430,804	1,434,481	1,103,720	1,144,177	1,109,977		
Gas Flow, scfm	678,917	687,104	696,610	696,610	698,275	813,058	853,711	853,711		
Gas Flow, lb/hr	3,105,478	3,111,649	3,154,699	3,154,699	3,162,242	3,682,054	3,866,156	3,866,156		
NOx, lb/hr (as NO2)	2,117	2,117	2,117	212	212	212	212	212		
Particulate, lb/hr	14,966	14,966	14,966	14,966	14965.7	14,966	75	75		
STREAM	1	2	3	4	5	6	7	8	9	10
	FD Fan Inlet	FD Fan Outlet	APH Air Outlet	Dilution Air Fan Inlet	Dilution Air Fan Outlet	AIG Feed	Ammonia Feed Pump Suction	Ammonia Feed Pump Discharge	Regulated Ammonia Flow	Damper Seal Air from Secondary
Temperature, F	75	76	450	75	77	77	75	75	40	450
Pressure, in. w.g.	-0.3	10.5	7.0	-1.0	40.0	30.0	-	-	25.0	2.0
Pressure, in.w.a.	404.0	414.7	411.2	403.2	444.2	434.2	-	-	429.2	406.2
Gas Flow, acfm	791,711	772,003	1,124,470	9,684	8,824	9,186	-	-	252	5,300
Gas Flow, scfm	775,885	775,885	659,502	9,472	9,472	9,639	-	-	281	3,080
Gas Flow, lb/hr	3,465,409	3,465,409	2,945,598	42,307	42,307	43,050	742	742	742	13,715
Pressure, psig	-	-	-	-	-	-	125	125	-	-
NOTES:										
1. All flows are total for one boiler unit.										
2. Standard conditions are based on 68 deg. F and 29.921 in.Hg.										
3. Air to sonic horns and bypass due to FGAS sampling is neglected.										
4. Flows streams exclude equipment sizing margins.										

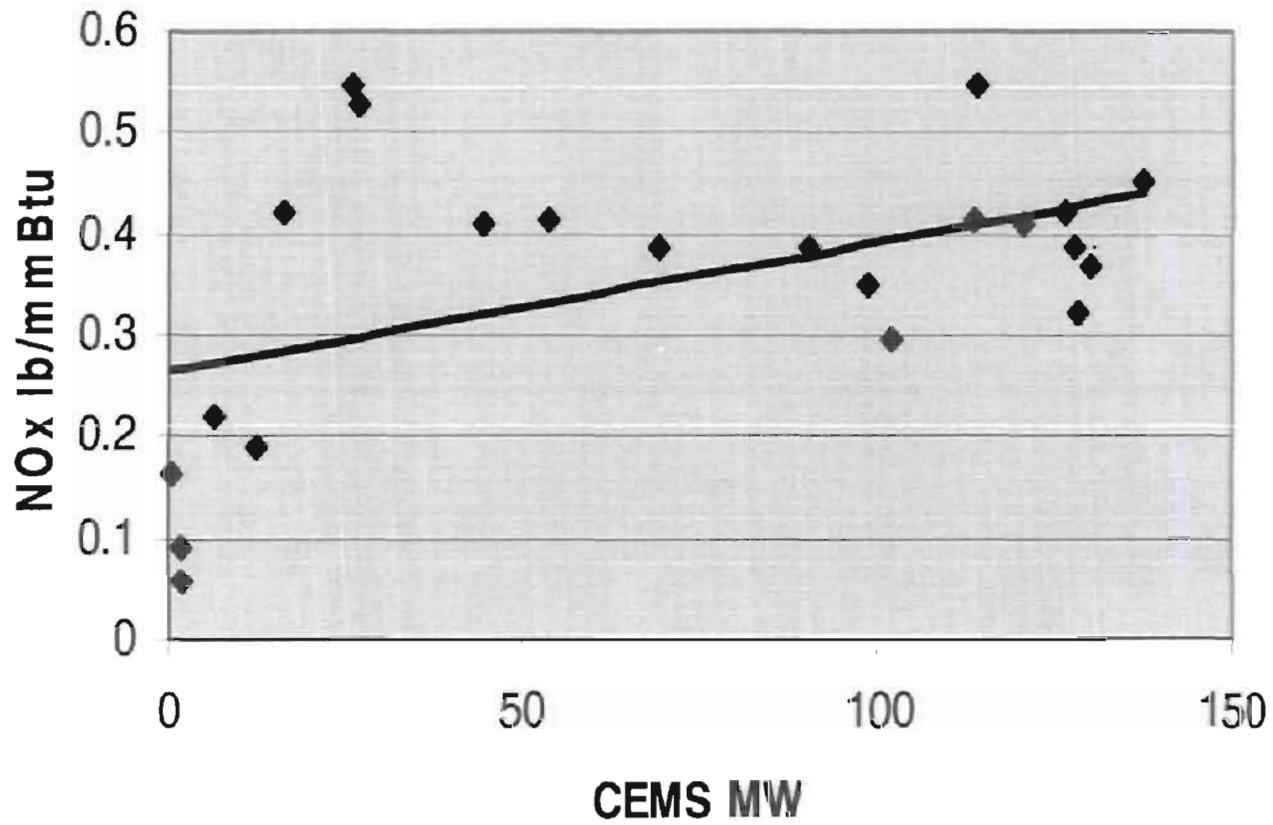
Attachment A

Crist Unit 7 NOx Data

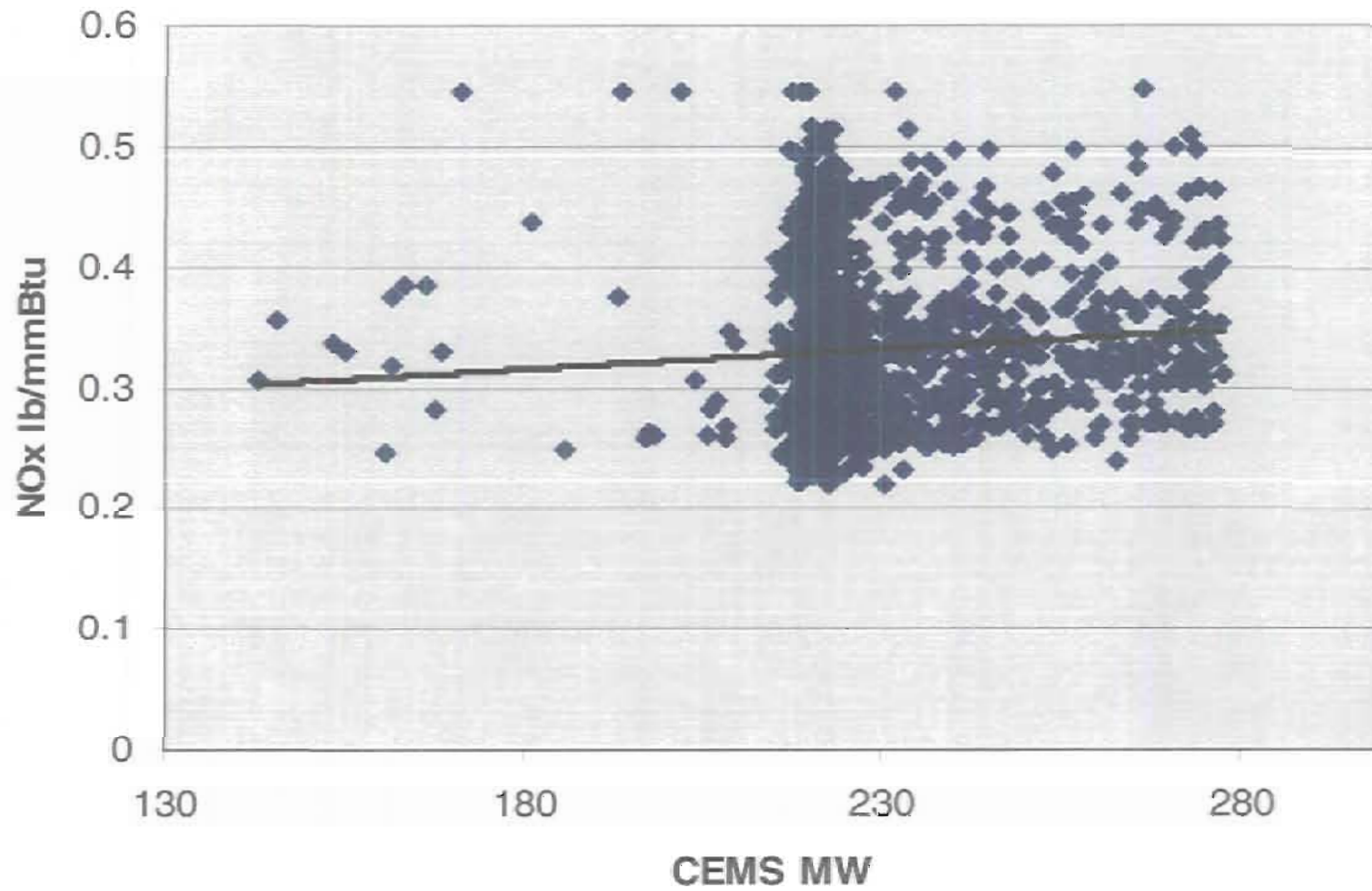
Crist Unit 7 NOx Data 2001 & 2002

	2002 thru 11/17	2002 thru 11/17	1/1/01-12/31/01	2001
Load Bin	NOx (lb/mmmbtu)	Hours	NOx (lb/mmmbtu)	Hours
0-25%	0.354	21	0.307	35
25-50%	0.331	1848	0.341	1711
50-75%	0.436	1073	0.45	1119
75-100%	0.604	2885	0.515	3005
Ave 4 Load Bins	0.486	5827	0.451	5870

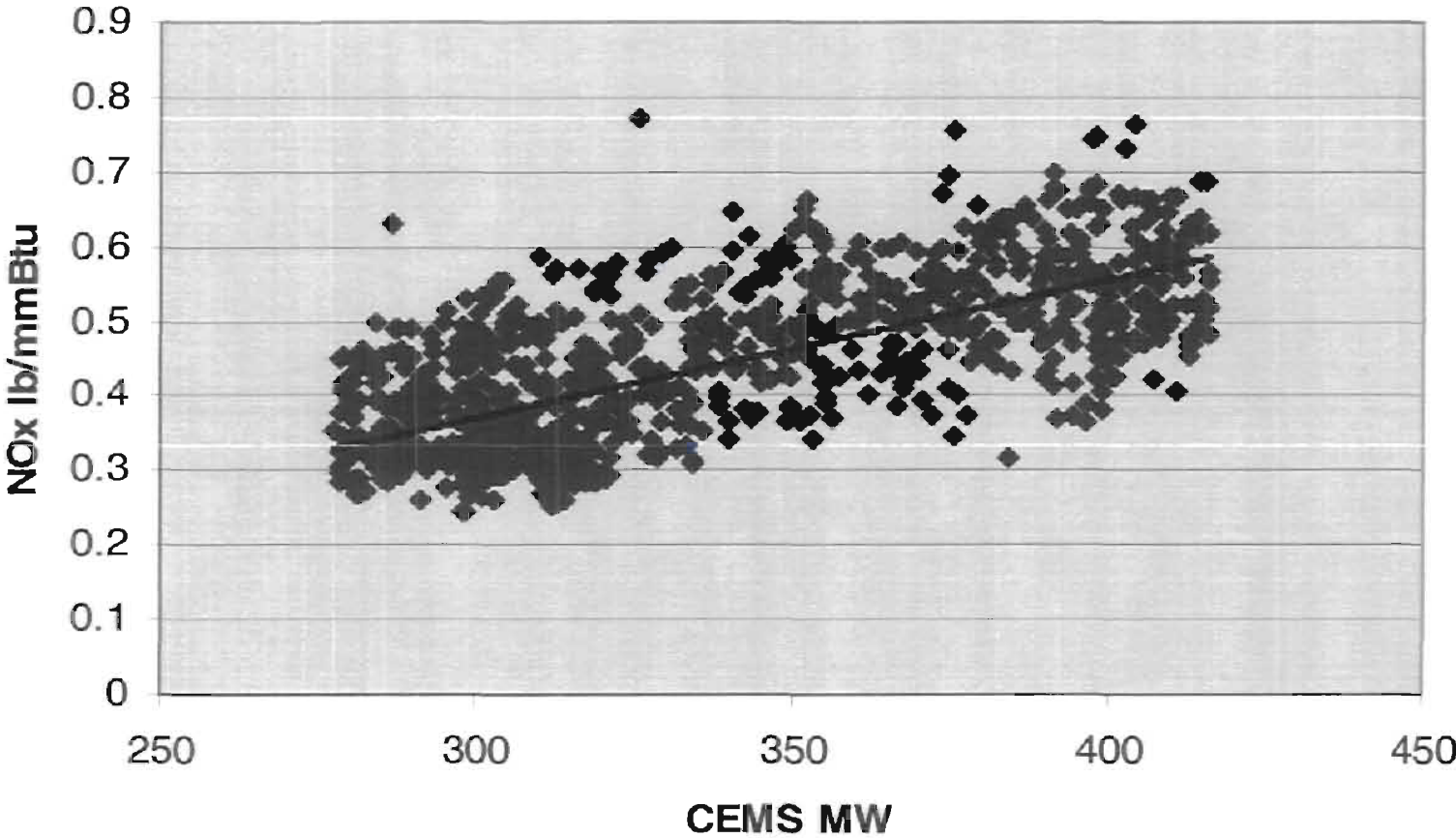
**Crist Unit 7 NOx (Load Bin 1) 0-25%
January - November 17, 2002**



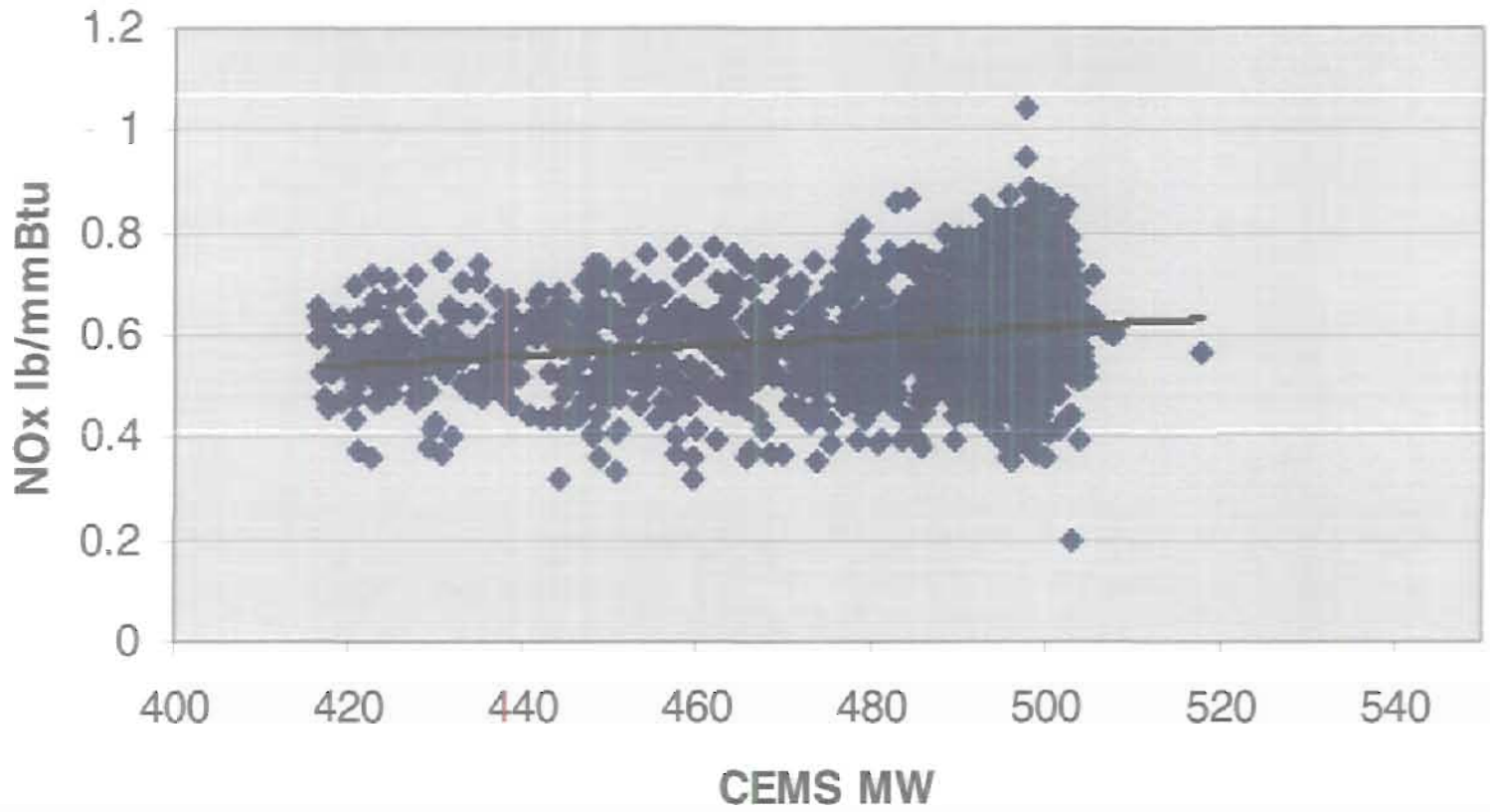
**Crist Unit 7 Hourly NOx (Load Bin 2) 25-50%
January - November 17, 2002**



**Crist Unit 7 Hourly NOx (Load Bin 3) 50-75%
January - November 17, 2002**



Crist Unit 7 Hourly NOx (Load Bin 4) 75-100% January - November 17, 2002

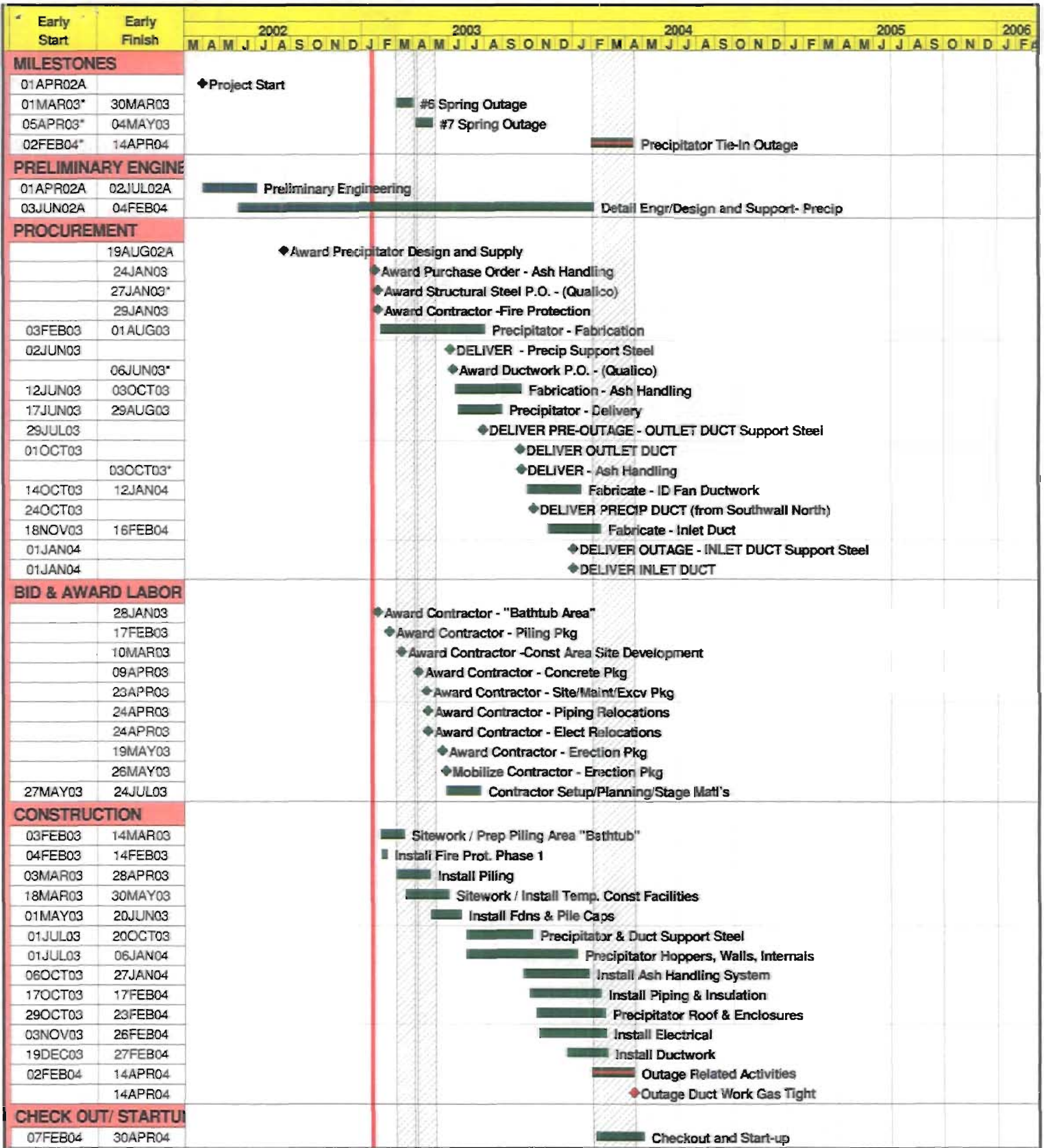


Gulf Power Proposal

- During periods of Crist Unit 7 SCR by-pass operation for maintenance or emergency operation allow NOx emissions rate at or below 0.35 lbs/mbtu.
- Gulf Power requests these operations be limited to no more than 15 days per year for routine maintenance activities and limited to case by case basis for emergency operations.
- Startup and Shutdown operations are exempt from all emissions averaging.

Attachment B

ESP & SCR Schedules

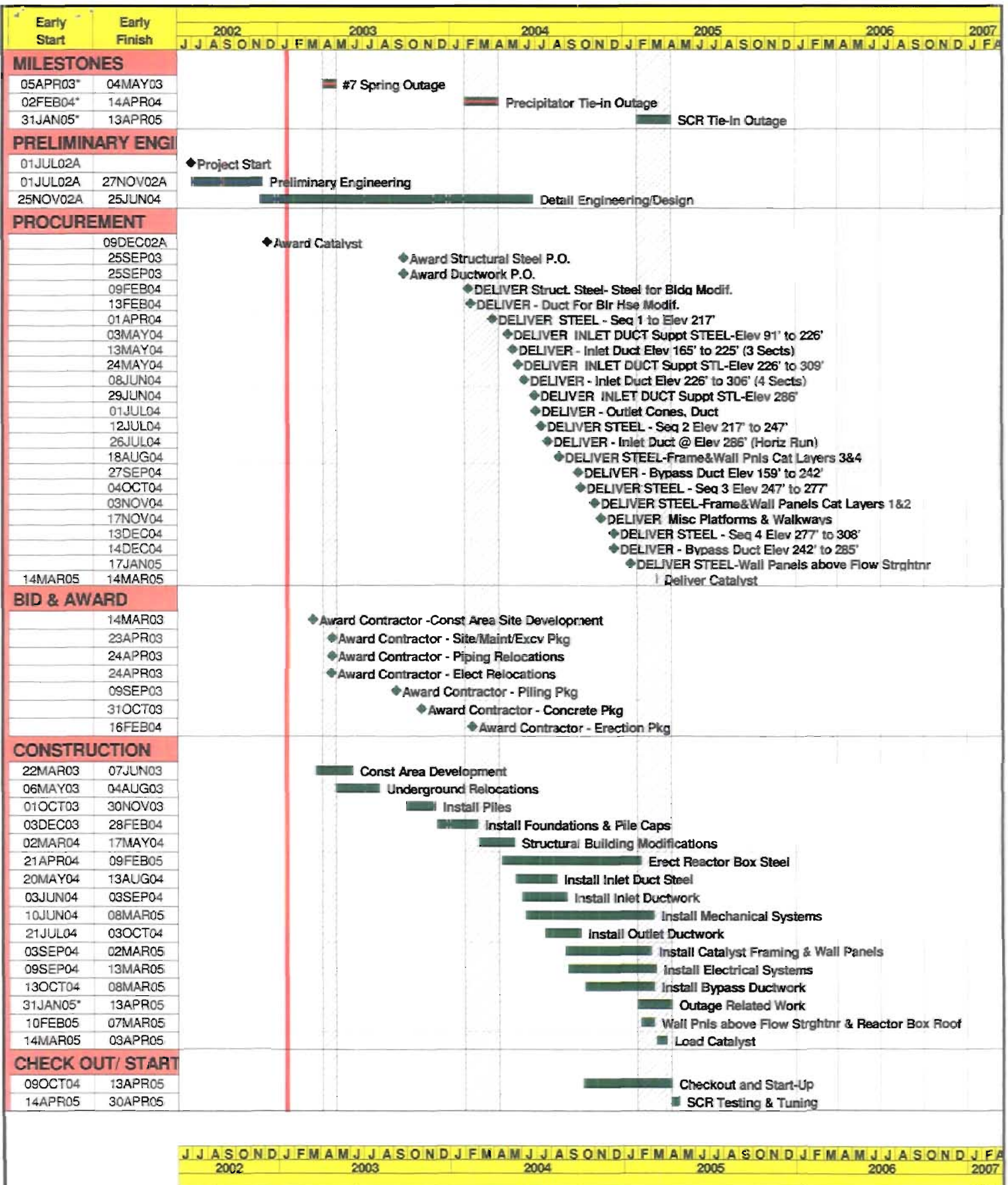


M A M J J A S O N D J F M A M J J A S O N D J F M A M J J A S O N D J F M A M J J A S O N D J F A
 2002 2003 2004 2005 2006

Start Date 01APR02 PR15
 Finish Date 09JUN04
 Data Date 20JAN03
 Run Date 27JAN03 15:31

SHEET 1 OF 1
SOUTHERN COMPANY GENERATION
CRIST UNIT 7 PRECIPITATOR
SUMMARY SCHEDULE

Date	Revision	Checked	Approved
11NOV02	Project Status		
02DEC02	Project Status		
06JAN03	Project Status		
20JAN03	Project Status		



Start Date 01APR02 SCRT
 Finish Date 30APR05
 Data Date 20JAN03
 Run Date 27JAN03 15:29

Sheet 1 of 1
SOUTHERN COMPANY GENERATION
CRIST UNIT 7 SCR Project
PRELIMINARY MASTER SCHEDULE

Date	Revision	Checked	Approved
06JAN03	Issued Preliminary		
20JAN03	Issued Preliminary		



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

January 22, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Gene L. Ussery, Jr., V.P. of Power Generation
Gulf Power Company – Crist Electric Generating Plant
One Energy Place
Pensacola, FL 32520-0328

Re: **Request for Additional Information**
Project No. 0330045-005-AC
Crist Unit 7 ESP/SCR Project

Dear Mr. Ussery:

On December 26, 2002, the Department received your application for an air construction permit to construct a new ESP and install an SCR system for existing Unit 7 at the Crist Power Plant. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Process Flow Diagram: Provide a process flow diagram of the entire system (boiler through stack) identifying the process and control equipment, flue gas fans, fuel inputs, CEMS monitoring points, ammonia injection point, bypass damper locations, and ash removal. Identify the approximate exhaust flows, temperatures, and pressure drop for each major component and for any substantial change in these parameters. Will the existing stacks or CEMS be modified due to this project?
2. ESP: Provide a general description of the ESP proposed for this project (number of chambers, number of fields, etc.). Identify the following ESP design parameters: reported collection efficiency (%); reported drift velocity of particles (ft/second); and the reported collection plate area (ft²). What is the design outlet particulate matter emission rate in terms of "lb/MMBtu of heat input" and "opacity"? Describe any flue gas conditioning that will be used to lower fly ash resistivity and any monitoring associated with this parameter. Identify the general components and operation of the system that will be used to remove particles from the collecting plates. Describe ash collection and removal including the control system used to adjust the cleaning frequency and intensity. Will the construction of the new ESP change the current methods, frequency, or duration of soot blowing for Unit 7? Please describe.
3. Selective Catalytic Reduction (SCR) System: Identify the following SCR design parameters: general catalyst composition (material); catalyst structure (honeycomb, plate, etc.); approximate catalyst volume (ft³); catalyst operational temperature range (° F); molar ratio of ammonia/NO_x; and design inlet and outlet NO_x emission rates (lb/MMBtu). Describe the ammonia distribution, flow control, and monitoring systems. What are the general procedures for startup and shutdown of the SCR system? What critical operating parameters and levels must be attained before commencing ammonia injection? Explain how the control system will monitor, adjust, and inject ammonia at a given rate. What are the estimated ammonia injection rates at 50%, 75%, and 100% of the maximum coal-firing rate? What is the target ammonia slip level based on the design criteria of 85% NO_x reduction? Describe the design and operating techniques used to prevent particulate matter from fouling and masking the catalyst beds. Provide the catalyst vendor's

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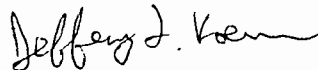
recommendations describing catalyst maintenance procedures and schedule. In response to catalyst deactivation, describe the process of gradually adding catalyst through complete replacement.

4. SCR Bypass Duct: Describe the general location and operation of the proposed SCR bypass duct. Under what conditions is it necessary to use the bypass? For each condition, estimate the duration of bypass operation and the number of times per year the bypass is expected to operate under the condition. Is Gulf Power requesting any specific permit conditions related to bypass operation? Please provide supporting documentation for any requests.
5. Schedule: Provide an updated project construction schedule similar to that shown in "Exhibit A" of the Gulf Power/DEP agreement.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you have any questions regarding this matter, please call me at 850/921-9536.

Sincerely,



Jeffery F. Koerner
New Source Review Section

cc: Mr. G. Dwain Waters, Gulf Power Co.
Mr. Gregory N. Terry, Gulf Power Co.
Ms. Sandra Veazey, NWD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Gene L. Ussery, Jr.
 V.P. of Power Generation
 Gulf Power Company - Crist Electric
 Generating Plant
 One Energy Place
 Pensacola, FL 32520-0328

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 X *G. Bealle* Agent Addressee

Received by (Printed Name) *G. BEALLE* C. Date of Delivery *1-24-03*

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

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**U.S. Postal Service
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 (Domestic Mail Only; No Insurance Coverage Provided)**

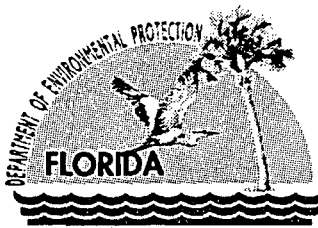
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Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To
 Gene L. Ussery, Jr.
 Street, Apt. No.,
 or P.O. Box No.
 One Energy Place
 City, State, ZIP+4
 Pensacola, FL 32520-0328



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

January 17, 2003

CERTIFIED MAIL

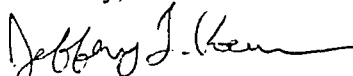
Mr. G. Dwain Waters
Air Quality Programs Supervisor
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Re: Project No. 0330045-005-AC
Gulf Power Company, Crist Power Plant
Unit 7 ESP/SCR Project
Return of Confidential Information

Dear Mr. Waters:

On December 26, 2002, the Department received Gulf Power's application to construct a new ESP and install an SCR system for the existing Crist Unit 7. Information related to the ESP and SCR design was labeled as "Attachment 2", and Gulf Power requested that this information be maintained as "confidential" pursuant to Section 430.111(1), F.S. At this time, no decisions have been made based on the information contained in Attachment 2. The Department has maintained Attachment 2 as if it were considered confidential information. However, the Department makes no determination that this information is, or is not, confidential information pursuant to the statute. The Department is returning Attachment 2 to you as the "Application Contact" for proper handling. The Department is still reviewing the application and expects soon to request more specific information related to the control equipment. If at that time, you believe that your response to the specific questions should be maintained as confidential information, please identify such information separately and provide a basis for the claim of confidentiality for each item. The Department will then determine the confidentiality of each item. If you have any questions, please contact me at 850/922-9536.

Sincerely,


Jeffery F. Koerner
New Source Review Section

cc: (letter only)

Mr. Gene L. Ussery, Jr, Gulf Power
Mr. Gregory N. Terry, P.E., Gulf Power
Ms. Sandra Veazey, NWD

TV/AAL/jfk

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SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee <i>James Bladely</i></p> <p>B. Received by (Printed Name) <input type="checkbox"/> Date of Delivery <i>12/23/03</i></p>
<p>1. Article Addressed to:</p> <p>Mr. G. Dwain Waters Air Quality Programs Supervisor Gulf Power Company One Energy Place Pensacola, FL 32520-0328</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. 7001 0320 0001 3692 7065</p>	
<p>PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540</p>	

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 7065

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To: **G. Dwain Waters**

Street, Apt. No., or PO Box: **One Energy Place**

City, State, ZIP+4: **Pensacola, FL 32520-0328**

PS Form 3800, January 2001 See Reverse for Instructions

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1. Trina

2. Al

3. Pat

4. Jeff (I have copies)

5. _____

PLEASE PREPARE REPLY FOR:

____ SECRETARY'S SIGNATURE

____ DIV/DIST DIR SIGNATURE

____ MY SIGNATURE

____ YOUR SIGNATURE

____ DUE DATE _____

ACTION/DISPOSITION

____ DISCUSS WITH ME

____ COMMENTS/ADVISE

____ REVIEW AND RETURN

____ SET UP MEETING

____ FOR YOUR INFORMATION

____ HANDLE APPROPRIATELY

____ INITIAL AND FORWARD

____ SHARE WITH STAFF

____ FOR YOUR FILES

COMMENTS:

Attachment 2 is locked up until a decision is made regarding confidentiality -

Please let me know if you would like to see it.

Thanks

FROM:

Pat

DATE:

12-27

PHONE:

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED
DEC 26 2002
BUREAU OF AIR REGULATION



Certified Mail

December 19, 2002

Jeffrey F. Koerner
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Koerner:

RE: CRIST ELECTRIC GENERATING PLANT
UNIT # 7 ESP & SCR APPLICATION
TITLE V Permit No: 0330045-001-AV

Thank you for meeting with representatives from Southern Company and me on November 26, 2002 to update the FDEP on the status of the Crist Unit 7 ESP and SCR Project and allowing us to start a dialog regarding SCR bypass operations. We will continue to update the Department as more information is available on specific issues regarding the operation of our SCR design and again invite you to visit our operations at Southern Company regarding advances in NOx and Mercury control technologies.

The purpose of this correspondence is to start the permitting process regarding the installation and operation of the new Electrostatic Precipitator (ESP) and Selective Catalytic Reduction (SCR) system planned for Crist Unit 7. As you are aware, an agreement between Gulf Power and the Florida Department of Environmental Protection (FDEP) was entered into on August 28, 2002 to ensure that Plant Crist located within the Pensacola, Florida Metropolitan Planning Area (PFMPA) supports the Area's compliance with the eight hour ozone ambient air quality standard and authorizes related cost recovery pursuant to Section 366.8255(1)(d) of the Florida Statutes as amended by the Florida Legislature in its 2002 session and signed into law by the Governor of the State of Florida. Through this agreement, FDEP and Gulf Power concur that installation of Selective Catalytic Reduction (SCR) controls at Crist Unit 7 as well as the implementation of other NOx reduction technologies on one or more of the other three coal-fired generating units at Plant Crist will be needed as part of a community wide effort to reduce ozone precursor compounds in the Pensacola Metropolitan Area. Due to

structural interference and performance concerns for the new SCR, a new Unit # 7 precipitator will also be constructed at a new location and completed by May 1, 2004. The Crist Unit #7 SCR will be completed by May 1, 2005 and NOx reductions on the remaining coal-fired units are required on or before May 1, 2007 pursuant to a final strategy and type of controls chosen. As a further part of this agreement, Gulf Power agrees to retire Crist Unit #1 within 120 days of the final order and Units #2 and #3 on or before May 1, 2006. These steps and changes are prudent for purposes of ensuring that Gulf Power's Plant Crist located within the FDMPA supports the Area's compliance with the eight hour ozone ambient air quality standard. A full copy of the agreement is attached as "Attachment 1" of this correspondence.

The construction of the Crist Unit 7 ESP and SCR will take several years and thus be completed in various phases as specific equipment is retired or replaced and new equipment is tied into the plant during annual outages. The first phase of the project is the planning and construction of infrastructure support facilities which include new parking lots, demolition and relocation of the maintenance shop, the creation of construction lay down area(s) and crane erection for the project. Coordination of these items has already begun with various county agencies with correspondences as needed to the local FDEP District. A summary of these activities are list below:

- State stormwater permitting (Chapter 62-25, F.A.C.)
- Federal NPDES stormwater construction permitting if applicable (delegated program to FL)
- Permitting extension to Crist potable water system to serve the construction village
- Development Review process with Escambia County. This is the process through which the county determines whether a "development" is in compliance with the local Land Development Code. The review is addressing local applicable permitting requirements such as:
 - county stormwater
 - wetlands review
 - potable water (we will provide our own water)
 - domestic waste (pursuing permitting of septic tank system for construction village)
 - parking are design requirements
 - road access (determined not applicable since Pate Road is privately owned)

The second phase of construction will be the installation of pile and foundations for the ESP and SCR. This process will include excavations into the current coal pile storage area east of the plant. The current schedule has this work beginning on March 3, 2003.

Phase 3 of the project is the erection of the precipitator and duct work support steel starting in April, 2003 with startup of the ESP earmarked for May, 2004. Phase 4 will the erection of the SCR and duct work support steel in September, 2003 with startup earmarked for May, 2005.

Design and specification of the Crist Unit 7 Electrostatic Precipitator (ESP) and Selective Catalytic Reduction (SCR) is enclosed as "Attachment 2". A gnatt chart with project milestone activities is included for an overall project summary and startup schedules. These documents should be considered "living" documents which will be revised as final engineering and conceptual designs are completed.

Mr. Jeffrey F. Koerner

Page 3

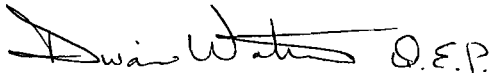
December 19, 2002

Pursuant to Section 403.111(1), Florida Statutes, Gulf Power requests that the Department maintain as confidential the information enclosed as Attachment 2 related to the ESP and SCR. The information describing the proposed ESP and SCR is proprietary and relates to a secret process and method, and Gulf Power Company would be severely prejudiced by disclosure of such information to competitors and to potential equipment and catalysts suppliers. Please confirm whether the Department agrees that this information should be kept confidential and exempt from the provisions of Section 119.07(1), Florida Statutes.

Please consider this as a request for a construction permit to replace the electrostatic precipitator and install a selective catalytic reduction (SCR) system at Crist Unit # 7. A professional engineer seal and responsible official certification statement are enclosed along with the revised Crist Unit 7 permit application pages as "Attachment 3".

Please let me know if you have questions or if further information is needed to process our construction permit request.

Sincerely,



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

cc: w/att: Jim. Vick, Gulf Power Company
 Wright, Terry, Gulf Power Company
 John Dominey, Gulf Power Company
 Robin B. Hurst, Southern Company Services
 Gary Perko, Hopping, Green & Sams
 Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida

ATTACHMENT 1
FDEP- Gulf Power Ozone Agreement

AGREEMENT FOR THE PURPOSE OF ENSURING COMPLIANCE WITH OZONE AMBIENT AIR QUALITY STANDARDS

This agreement is entered into by the Florida Department of Environmental Protection (DEP) and Gulf Power Company (GULF), for the exclusive purposes as follows: (a) ensuring that GULF's electrical generating facility located within the Pensacola, Florida Metropolitan Planning Area (PFMPA) supports the Area's compliance with the eight hour ozone ambient air quality standard and (b) authorizing related cost recovery pursuant to Section 366.8255(1)(d) of the Florida Statutes as amended by the Florida Legislature in its 2002 session and signed into law by the Governor of the State of Florida.

WHEREAS:

I. GULF owns and operates the Crist Plant electrical generating facility in Escambia County, Florida. This plant generates electricity for the consuming public through the combustion of fossil fuel. The combustion of fossil fuels produces some of the precursor compounds that contribute to the formation of ozone in the ambient air.

II. Under the authority of the Clean Air Act, the U. S. Environmental Protection Agency (EPA) promulgated regulations dealing with air quality, including ambient air quality standards designed to protect human health and welfare. One such regulation places a limit on the amount of ozone that is considered to be acceptable in the ambient air during any 8-hour period (Ozone Standard).

III. Based upon the best available information, including ambient air quality monitoring data, DEP does not expect Escambia and Santa Rosa Counties to be in compliance with the Ozone Standard in 2004/2005 unless significant reductions of emissions of ozone precursor compounds are achieved in the Pensacola, Florida Metropolitan Planning Area.

IV. In its 2002 session, the Florida legislature adopted amendments to section 366.8255(1)(d) of the Florida Statutes to provide that an electric utility may seek recovery of costs and expenses prudently incurred pursuant to a voluntary agreement with DEP or EPA, for the purpose of ensuring compliance with ozone ambient air quality standards.

V. Representatives of DEP and GULF have met and arrived at a mutual agreement in furtherance of the purposes of Section 366.8255(1)(d)7 of the Florida Statutes as amended during the 2002 Florida legislative session.

VI. DEP and GULF concur that installation of Selective Catalytic Reduction (SCR) controls at Crist Unit #7 as well as the implementation of other NOx reduction

technologies on one or more of the other three coal-fired generating units at Plant Crist will be needed as part of a community wide effort to reduce ozone precursor compounds in the Pensacola Metropolitan Planning Area. Due to structural interference and performance concerns for the new SCR, a new Unit #7 precipitator will also be constructed at a new location and the SCR will be completed one year later in the location of the old Unit #7 precipitator.

VII. It is anticipated that the implementation of this agreement will result in an approximately 61% reduction [9,188 tons] in annual NOx emissions from the GULF Crist Plant based upon 1999 baseline data.

NOW THEREFORE, in consideration of the premises and the mutual agreements contained herein, and intending to be legally bound, the DEP and GULF hereby agree as follows:

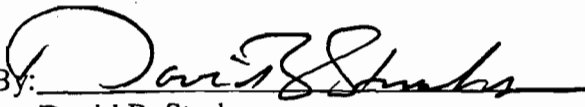
1. By May 1, 2005, GULF, after obtaining necessary permits and approvals, will install and begin and continue operating an SCR system at Crist Unit #7 whenever the Crist Unit #7 is online. The SCR system is designed to achieve no less than an 85% reduction in the quantity of nitrogen oxides as measured at the SCR unit inlet (SCR Project). The SCR Project includes the installation of a new precipitator necessary to structurally accommodate installation of the SCR. See Exhibit "A" for proposed project schedule.
2. In addition to the Crist Unit #7 SCR Project, and in order to achieve an overall plant wide Btu weighted average of 0.2 lbs/mmbtu NOx emission rate as further specified in paragraph 3 below, Gulf agrees to conduct engineering studies on the feasibility of other NOx reduction technologies on one or more of the remaining three coal-fired units at Plant Crist. Such studies and related unit specific demonstration projects may include (but are not limited to) SCR, Selective Non-Catalytic Reduction (SNCR) technology, Over-Fired Air (OFA) technology, natural gas reburn technology, selective use of biomass fuel, etc. Gulf further agrees to complete these studies by May 1, 2005. In the event GULF identifies an SCR project for Crist Unit #6 as the NOx reduction technology, GULF will implement, begin and continue operating the SCR on Crist Unit #6 as described in paragraph 3 below by December 31, 2007. In the event GULF identifies a NOx reduction technology other than SCR on Crist Unit #6, GULF will select and implement one or more NOx reduction technologies on one or more of the three other Plant Crist coal-fired units by May 1, 2006. GULF will obtain written concurrence from DEP, before implementing such NOx reduction technology or technologies, that the use thereof is reasonable and necessary to achieve the overall plantwide emission rate of 0.2 lbs/mmbtu specified in paragraph 3 below.

3. GULF will make necessary changes identified and within the timeframes set forth in paragraph 2 above, that will allow it to limit the overall 30 day average NOx emission rate at the Crist Plant to 0.2 lbs./mmbtu year-round except for periods in which Crist Unit #7 is offline. The emission rate shall be calculated pursuant to the formula set forth in Exhibit "B" to this agreement. While Crist Unit #7 is online, this 0.2 lbs./mmbtu will be achieved by utilizing the SCR system on Crist Unit #7 [discussed in paragraph 1 above] and the controls identified pursuant to paragraph 2 above. During such time as Crist Unit #7 may be offline between May 1 and September 15, GULF agrees to operate any NOx reduction technology or technologies DEP may have determined to be reasonable and necessary at other Plant Crist coal-fired units, pursuant to paragraph 2 above, unless prevented from doing so by circumstances beyond its reasonable control.
4. In addition to the NOx emission rate reduction strategies implemented pursuant to paragraphs 1 through 3 above, as a further part of this agreement to support the PFMPA's compliance with the eight hour ozone ambient air quality standard, GULF agrees to retire Crist Unit #1 within 120 days of receiving a final order from the Florida Public Service Commission as provided in paragraph 8 below. In addition, GULF further agrees to retire Crist Unit #2 and Crist Unit #3 on or before May 1, 2006.
5. In the event state or federal law changes to require a change in NOx emissions or the PFMPA is declared non-attainment for ozone, any reduction requirements would be in accordance with all applicable state and federal requirements. In addition, although Florida currently has no state statute providing for NOx trading or credits, GULF shall be entitled to retain all NOx reduction credits and trading rights that may be authorized by Florida law in the future.
6. In the event the FPSC issues a final order authorizing GULF to recover costs incurred pursuant to this agreement, by July 5, 2004, GULF will submit a Title V renewal application to the Department's Bureau of Air Regulation, 2600 Blair Stone Rd, MS 5500, Tallahassee, FL 32399 to incorporate the control technologies contained in this agreement as well as the NOx emission rate as described in paragraphs 1 through 3 above. DEP concurs that the changes envisioned by this agreement will not constitute "modifications" that trigger New Source Review.
7. DEP concurs that the steps and changes described in paragraphs 1 through 4 above are prudent for purposes of (a) ensuring that GULF's electrical generating facility located within the PFMPA supports the Area's compliance with the eight hour ozone ambient air quality standard and (b) authorizing

related cost recovery pursuant to Section 366.8255(1)(d) of the Florida Statutes as amended by the Florida Legislature in its 2002 session and signed into law by the Governor of the State of Florida.

8. This agreement is based upon the assumption that an order from the Florida Public Service Commission (FPSC) authorizing GULF to recover the costs incurred pursuant to this agreement through the Environmental Cost Recovery Clause is rendered final (final order) within 90 days of the execution of the agreement. A final order is one that is no longer subject to review or appeal by a court of competent jurisdiction. If a final order is not rendered within 90 days of the date of execution of this agreement, the parties concur that the dates and schedules herein are subject to revision solely by mutual agreement, in order to allow GULF to move forward with the activities described in paragraphs 1-4 above pending a final order by the FPSC. Gulf will exercise good faith in seeking approval of such cost recovery from the FPSC in a timely manner. DEP will support the efforts of GULF before the FPSC and in any subsequent review or appeal. If a final order is not rendered within 120 days of execution of this agreement, the entire agreement shall automatically become null and void unless extended by mutual written agreement of the parties within 30 days thereafter.
9. This agreement shall bind the parties hereto and those whom they represent and may be modified only in writing with the consent of both parties.
10. This agreement is entered into and effective on the date of the last signature of the parties below.

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

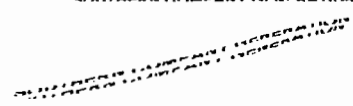
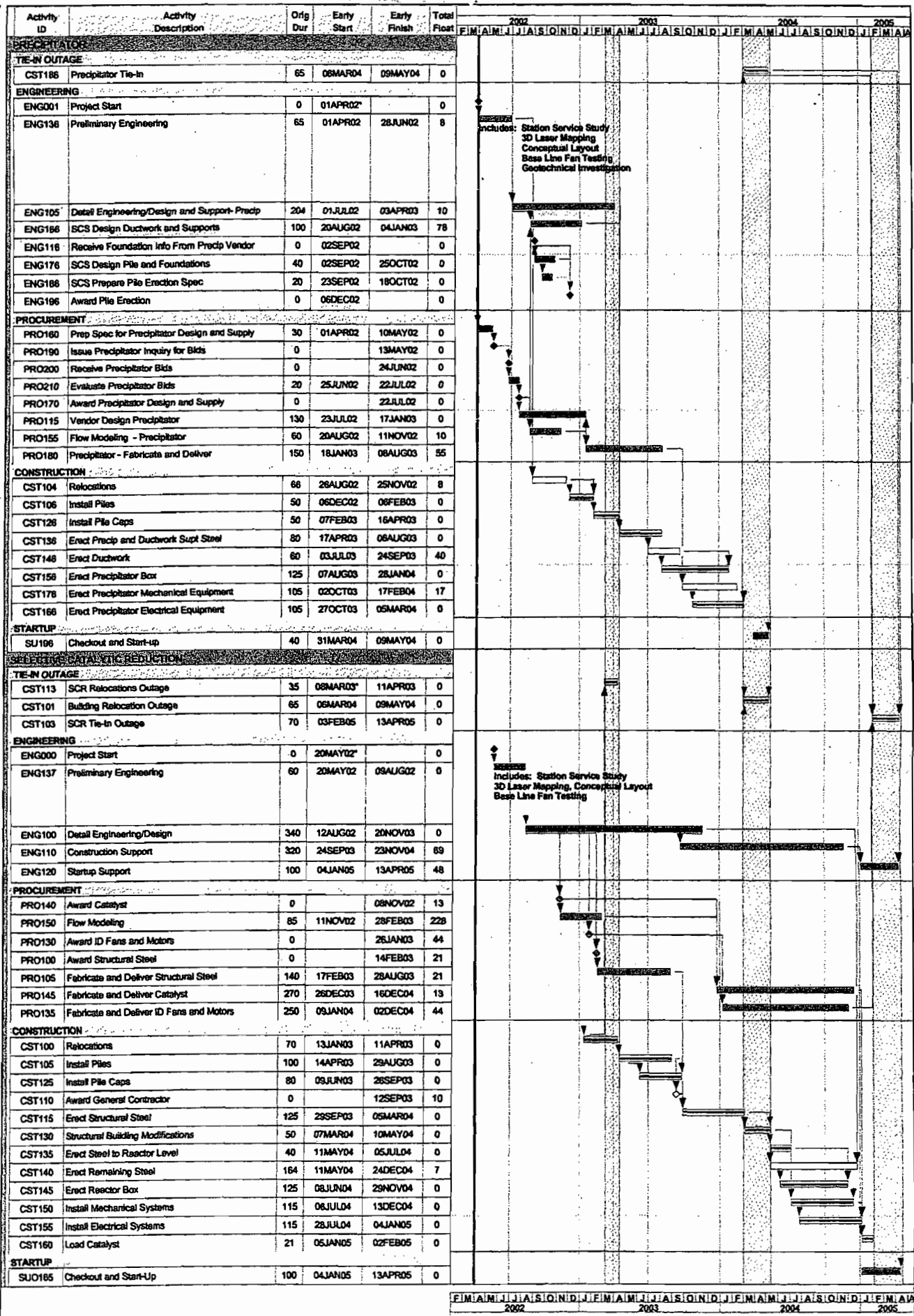
By: 
David B. Struhs
Secretary

Date: August 28, 2002

GULF POWER COMPANY

By: 
Thomas A. Fanning
President and Chief Executive Officer

Date: August 28, 2002



**AGREEMENT FOR THE PURPOSE OF ENSURING
COMPLIANCE WITH OZONE AMBIENT AIR
QUALITY STANDARDS**

Exhibit "B"

Gulf will measure its compliance with the emission rate limit set forth in paragraph 3 of this agreement by determining the Plant Crist NOx emission rate, when Crist Unit #7 has operated for 30 sequential days (which need not be consecutive) on a generating unit-specific btu weighted average basis pursuant to the following formula:

$$\begin{array}{l}
 \text{plant wide} \\
 \text{daily} \\
 \text{mmbtu} \\
 \text{weighted} \\
 \text{NOx rate}
 \end{array}
 = \frac{\sum_{\text{Units } 4, 5, 6, 7} \left[\left(\text{Unit \# daily mmbtu} \right) \times \left(24 \text{ hour avg unit \# NOx CEMs rate} \right) \right]}{\sum_{\text{Units } 4, 5, 6, 7} \left(\text{Unit \# daily mmbtu} \right)}$$

For the purposes of this calculation, a Crist Unit #7 operating day means any calendar day that Crist Unit #7 is online a minimum of 18 hours.

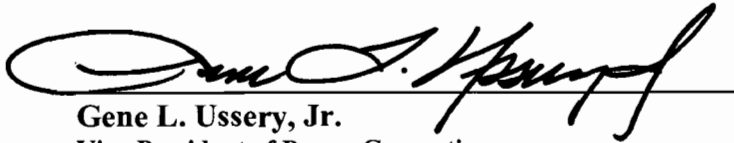
Unit # daily mmbtu (heat input) in the foregoing formula is determined by Plant Crist's daily as-burned fuel analysis

ATTACHMENT 3
RO & PE Certification Pages
Revised Permit Application Pages for Crist 7

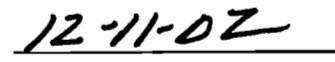
**CRIST ELECTRIC GENERATING PLANT
UNIT # 7 ESP & SCR CONSTRUCTION APPLICATION
CERTIFICATION BY RESPONSIBLE OFFICIAL**

“I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Title V source for which this request is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this request are true, accurate and complete.”

Responsible Official Signature:



Gene L. Ussery, Jr.
Vice-President of Power Generation



Date:

**CRIST ELECTRIC GENERATING PLANT
Unit # 7 ESP & SCR CONSTRUCTION PERMIT
CERTIFICATION BY PROFESSIONAL ENGINEER**

"I, the undersigned, am a registered professional engineer in the State of Florida and hereby certify to the best of my knowledge that all information for the construction and design of the Unit # 7 Electrostatic Precipitator and Selective Catalytic Reduction System at the Crist Electric Generating Plant is true, accurate and complete. "

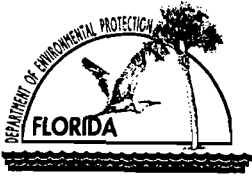
Professional Engineer Signature:



Gregory N. Terry
Registration Number: 52786

12-17-02

Date



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Gulf Power Company	
2. Site Name: Crist Electric Generating Plant	
3. Facility Identification Number: 0330045 [] Unknown	
4. Facility Location: Pate Road Street Address or Other Locator: (off of 10 mile road) on Governors Bayou City: Pensacola County: Escambia Zip Code: 32520-0340	
5. Relocatable Facility? [] Yes [<input checked="" type="checkbox"/>] No	6. Existing Permitted Facility? [<input checked="" type="checkbox"/>] Yes [] No

Application Contact

1. Name and Title of Application Contact: G. Dwain Waters Air Quality Programs Supervisor
2. Application Contact Mailing Address: Organization/Firm: Gulf Power Company Street Address: One Energy Place City: Pensacola State: FL Zip Code: 32520-0328
3. Application Contact Telephone Numbers: Telephone: (850) 444 - 6527 Fax: (850) 444 - 6217

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	<i>12-26-07</i>
2. Permit Number:	<i>0330045-005-AC</i>
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[] Initial Title V air operation permit for an existing facility which is classified as a Title V source.

[] Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

[] Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit number to be revised: _____

[] Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: _____

[] Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: _____

Reason for revision: _____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[X] Air construction permit to construct or modify one or more emissions units.

[] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

[] Air construction permit for one or more existing, but unpermitted, emissions units.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Project consists of the replacement of the Crist Unit 7 electrostatic precipitator and the addition of a selective catalytic reduction system. The Unit 7 ESP is scheduled to begin operation by May 1, 2004. The Unit 7 SCR is schedule to begin operation by May 1, 2005. Pile and foundation work is scheduled to begin on March 3, 2003.

2. Projected or Actual Date of Commencement of Construction: **March 3, 2003**

3. Projected Date of Completion of Construction: **May 1, 2004, May 1, 2005**

Application Comment

The Crist Unit 7 modifications outlined in this application are pollution control projects and are exempt from New Source Review. Some modifications are expected in the Economizer Control Damper, the Economizer Hopper, the Air Preheater and the Perheater Inlet in order to retrofit the Selective Catalytic Reduction System. These modifications will not increase emissions or add capacity to Crist Unit 7.

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Crist Unit 7 Electric Utility Boiler</p>			
<p>4. Emissions Unit Identification Number: <input type="checkbox"/> No ID</p> <p>ID: 007 <input type="checkbox"/> ID Unknown</p>			
<p>5. Emissions Unit Status Code: A</p>	<p>6. Initial Startup Date:</p>	<p>7. Emissions Unit Major Group SIC Code: 49</p>	<p>8. Acid Rain Unit? <input checked="" type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters) Crist Unit 7 is a Foster Wheeler front and rear wall fired, dry bottom boiler. The primary fuels are coal and natural gas. Distillate # 2 fuel oil is combusted as a secondary fuel.</p>			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Particulate Controls

Particulate emissions are controlled a Alstom cold side electrostratic precipitator replacing the existing Buell electrostatic precipitator in May, 2004.

NO_x Controls

Dry low-NO_x combustors and the addition of a selective catalytic reduction system in May, 2005.

2. Control Device or Method Code(s): **25 (dry low-NO_x); 065 Catalytic Reduction**

Emissions Unit Details

1. Package Unit:	
Manufacturer: Westinghouse	Model Number:
2. Generator Nameplate Rating: 578 MW	
3. Incinerator Information:	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)****Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	6406.4 (HHV) mmBtu/hr	
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	Unit 7 is capable of full load on coal and gas with # 2 fuel oil and "on spec" used oil as secondary fuels.	

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

See Attachment A-1	

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? Stack		2. Emission Point Type Code: 2	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Common stack with Crist Unit 6			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: Crist Unit 6 – ARMS #006 Crist Unit 7 – ARMS #007			
5. Discharge Type Code: V	6. Stack Height: 450 feet	7. Exit Diameter: 23.2 feet	
8. Exit Temperature: 270 °F	9. Actual Volumetric Flow Rate: 2462700 acfm	10. Water Vapor: 9.0 %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: 16 East (km): 478.500 North (km): 3381.300			
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Boiler fired with pulverized bituminuous coal. Emissions related to ton burned.		
2. Source Classification Code (SCC): 1-01-002-02		3. SCC Units: Tons Burned (solid fuel)
4. Maximum Hourly Rate: 242.68	5. Maximum Annual Rate: 2,125,876.80	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 3.90	8. Maximum % Ash: 15.8	9. Million Btu per SCC Unit: 12800
10. Segment Comment (limit to 200 characters): Unit capable of full load with coal.		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Boiler fired with natural gas.		
2. Source Classification Code (SCC): 1-01-006-01		3. SCC Units: Million Cubic Feet Burned
4. Maximum Hourly Rate: 5.82	5. Maximum Annual Rate: 50,983.20	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.01	8. Maximum % Ash: 0.00	9. Million Btu per SCC Unit: 1060
10. Segment Comment (limit to 200 characters): Unit capable of full load with natural gas.		

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Boiler fired with No. 2 fuel oil. Emissions related to thousand gallons burned		
3. Source Classification Code (SCC): 1-01-005-01		3. SCC Units: Thousand Gallons Burned (all liquid fuel)
4. Maximum Hourly Rate: 9.29	5. Maximum Annual Rate: 81,406.68	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.50	8. Maximum % Ash: 0.10	9. Million Btu per SCC Unit: 138
10. Segment Comment (limit to 200 characters): Fuel use limited to startup, flame stabilization and used oil utilization for energy recovery.		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
SO2			EL
SAM			NS
NOX	065	024	EL
CO			NS
PM	010		EL
PM10			NS
VOC			NS
HCL			NS
H107 (HF)			NS

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: SO2	2. Total Percent Efficiency of Control:	
3. Potential Emissions: 34,166.21 lb/hour	149,648.01 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year		
6. Emission Factor: 38 (S%).95 = SO2 lbs/ton of coal burned Reference: AP-42		7. Emissions Method Code: 3
8. Calculation of Emissions (limit to 600 characters): [38 (3.9%S) .95] = 140.79 SO2 lbs/ton of coal thus; [140.79 lb/ton] [242.675 ton/hr] = 34, 166.21 SO2 lbs/hr thus; [140.79 lb/ton] [242.675 ton/hr] [8760 hr/yr] [1/2000 lb/ton] = 149,648.01 SO2 ton/yr		
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): The allowable emissions of this pollutant is 5.9 SO2 lb/MMBTU heat input per Rule 62-296.405(1)(2)c. No change in emissions due to the replacement of the ESP or addition of the SCR project.		

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: Rule	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 5.9 lbs/mmbtu	4. Equivalent Allowable Emissions: 34,364.60 lb/hour 150,503.80 tons/year
5. Method of Compliance (limit to 60 characters): Daily 24 hour average based on CEM or FS&A	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): See specific condition C23. in Title V Permit for compliance demonstration to standard.	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: SAM	2. Total Percent Efficiency of Control:
3. Potential Emissions: 276.93 lb/hour 1,212.94 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 1.14114 SAM lb/ton of coal burned Reference: AP-42	7. Emissions Method Code: 3
8. Calculation of Emissions (limit to 600 characters): [1.14114 lb/ton of coal] [242.675 ton/hr] [8760 hr/yr] [1/2000 lb/ton] = 1212.9 ton/yr AP-42 factor	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): No change in emissions due to the replacement or the ESP or addition of the SCR project.	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: NOx Revised for SCR	2. Total Percent Efficiency of Control: 85% in May 1, 2005
3. Potential Emissions: 789.9 lb/hour 3459.79 tons/year	4. Synthetically Limited? [<input checked="" type="checkbox"/>]
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 3.255 lb/hr Reference: AP-42 @ 85% reduction	7. Emissions Method Code: 5
8. Calculation of Emissions (limit to 600 characters): [21.7 @85% reduction] = 3.255 NOx lb/ton of coal fired [3.255 lb/ton of coal] [242.675 ton/hr] [8760 hr/yr] [1/2000 lb/ton] = 3459.79 ton/yr assumes AP-42 factor @ 85% reduction for SCR starting in May, 2005	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): There is no change in emissions due to the replacement of the ESP. There is a potential annual reduction of NOx emissions from the installation of the SCR on the unit in May, 2005 of (14,416 – 3460) approximately 10,956 tons per year.	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: FDEP – Gulf Power Ozone Agreement	2. Future Effective Date of Allowable Emissions: May 1, 2006 or 2007 *
3. Requested Allowable Emissions and Units: NOx average for Facility @ 0.20 lb/mbtu	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters): NO_x CEMS	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Crist Unit 4-5-6-7 plant wide 30 day average to meet 0.20 lb/MMBTU hr average when Unit 7 is on-line. * Future compliance date based on strategy to be filed later.	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: CO	2. Total Percent Efficiency of Control:
3. Potential Emissions: 121.9 lb/hour	4. Synthetically Limited? [] 531.46 tons/year
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.5 CO lb/ton of coal Reference: AP-42	7. Emissions Method Code: 3
8. Calculation of Emissions (limit to 600 characters): [0.5 lb/ton of coal] [242.675 ton/hr] [8760 hr/yr] [1/2000 lb/ton] = 531.46 ton/yr AP-42 factor	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): No change in emissions due to the replacement of the ESP or addition of the SCR project.	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 99.6%
3. Potential Emissions: 153.4 lb/hour	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.04 (%ash) = PM lb/ton of coal fired Reference: AP-42 @ 99.6% ESP Efficiency	7. Emissions Method Code: 5
8. Calculation of Emissions (limit to 600 characters): <p>[0.04(%Ash) = PM lbs/ton of coal fired based on 99.6% efficiency [0.04(15.8%) = .632 PM lbs/ton of coal fired [0.632 lb/ton of coal] [242.675 ton/hr] = 153.37 lb/hr [0.632 lb/ton of coal] [242.675 ton/hr] [8760 hr/yr] [1/2000 lb/ton] = 671.76 ton/yr AP-42 factor using 99.6% efficiency</p>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): <p>Original Title V emissions estimate based on 99.2% efficiency @ an average ash content of 9.3%. Revised estimates based on 99.6% efficiency @ maximum ash content of 15.8%. Net reduction in potential emissions estimated is (790.81-671.76) = 119.05 PM tons/year from the new ESP.</p>	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: Rule	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.10 lb/mbtu	4. Equivalent Allowable Emissions: 582.40 lb/hour 2,550.91 tons/year
5. Method of Compliance (limit to 60 characters): Annual Method 17 Particulate Test	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Particulate standatd is 0.1 lb/mmmbtu in 62-296.405(1)(b) and test method is 62-296-405(1)(e)2.	

Emissions Unit Information Section _____ of _____

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: Rule	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.30 lb/mbtu	4. Equivalent Allowable Emissions: 1,747.20 lb/hour 956.59 tons/year
5. Method of Compliance (limit to 60 characters): Annual Method 17 Particulate Test	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Excess emissions under 62-210.700 (3). Test method is 62-296-405(1)(e)2.	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: PM10	2. Total Percent Efficiency of Control: 99.6
3. Potential Emissions: 95.9 lb/hour 419.85 tons/year	4. Synthetically Limited? <input type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.025(%ash) = PM10 lb/ton of coal fired Reference: AP-42 using 99.6% efficiency	7. Emissions Method Code: 3
8. Calculation of Emissions (limit to 600 characters): [0.025(%Ash) = PM10 lbs/ton of coal fired based on 99.6% efficiency [0.025(15.8%) = .395 PM10 lbs/ton of coal fired [0.395 lb/ton of coal] [242.675 ton/hr] = 95.86 lb/hr [0.395 lb/ton of coal] [242.675 ton/hr] [8760 hr/yr] [1/2000 lb/ton] = 419.85 ton/yr AP-42 factor using 99.6% efficiency	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Original Title V emissions estimate based on 99.2% efficiency @ an average ash content of 9.3%. Revised estimates based on 99.6% efficiency @ maximum ash content of 15.8%. Net reduction in potential emissions estimated is (494.26-419.85) = 74.41 PM10 tons/year from the new ESP.	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: HCL	2. Total Percent Efficiency of Control:	
3. Potential Emissions: 422 lb/hour	1848.36 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year		
6. Emission Factor: tons coal x 2000lbs/ton x ppm Cl in coal x 1E-6 x 1.028 lb HCL = lbs HCL released Reference: EPRI Emissions Factor Handbook		7. Emissions Method Code: 5
8. Calculation of Emissions (limit to 600 characters): $[\text{tons coal}] [2000 \text{ lb/ton}] [\text{ppm Cl}] [1\text{E-}6 \times 1.028\text{lb HCL/lb CL/hr}] = \text{HCL lbs released}$ $[242.675 \text{ tons coal/hr}] [2000][846 \text{ ppm}] [1\text{E-}6 \times 1.028 \text{ lb HCL}] = 422 \text{ lbs/hr}$ $[422 \text{ HCL lbs/hr} [8760] [1/2000 \text{ lb/ton}] = 1848.36 \text{ HCL tons/yr}$		
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): No change in emissions due to the replacement of the ESP or addition of the SCR project.		

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: HF	2. Total Percent Efficiency of Control:
3. Potential Emissions: 36.8 lb/hour 161.2 tons/year	4. Synthetically Limited? <input type="checkbox"/>
5. Range of Estimated Fugitive Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year	
6. Emission Factor: tons coal x 2000lbs/ton x ppm F in coal x 1E-6 x 1.053 lb HF x 0.90= lbs HF released Reference: ERPI Emissions Factor Handbook	7. Emissions Method Code: 5
8. Calculation of Emissions (limit to 600 characters): $[\text{tons coal}] [2000 \text{ lb/ton}][\text{ppm F}] [1\text{E-}6 \times 1.028 \text{ lb HF/lb F/hr}][0.90] = \text{HF lbs released}$ $[242.675 \text{ tons coal/hr}] [2000][80\text{ppm}] [1\text{E-}6 \times 1.053 \text{ lb HF}][0.90] = 36.8 \text{ lbs/hr}$ $[36.8 \text{ HF lbs/hr} [8760] [1/2000 \text{ lb/ton}] = 161.2 \text{ HF tons/yr}$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): No change in emissions due to the replacement of the ESP or addition of the SCR project.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: VES	2. Basis for Allowable Opacity: <input checked="checked" type="checkbox"/> Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: 40 % Exceptional Conditions: 60 % Maximum Period of Excess Opacity Allowed: 60 min/hour	
4. Method of Compliance: EPA Reference Method 9 or Opacity Monitoring System	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.405(1)(a)	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input checked="checked" type="checkbox"/> Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: 40 % Exceptional Conditions: 100 % Maximum Period of Excess Opacity Allowed: 60 min/hour	
4. Method of Compliance: EPA Reference Method 9 or Opacity Monitoring System	
5. Visible Emissions Comment (limit to 200 characters): Excess emissions resulting from startup, shutdown, or malfunction not-to-exceed 2 hours in any 24 hour period unless authorized by FDEP for a longer duration. Rule 62-210.700(1), F.A.C.	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 5

1. Parameter Code: VE	2. Pollutant(s):
3. CMS Requirement:	<input checked="checked" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Lear Siegler Model Number: SS-4542 Serial Number: 926232	
5. Installation Date: 12-01-1992	6. Performance Specification Test Date: 09-03-2002
7. Continuous Monitor Comment (limit to 200 characters): <p align="center">Unit required to monitor opacity under 62-296.405(1)(f)1.</p>	

Continuous Monitoring System: Continuous Monitor 2 of 5

1. Parameter Code: Flow	2. Pollutant(s):
3. CMS Requirement: 40 CFR Part 75	<input checked="checked" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): <p align="center">Required by 40 CFR Part 75 (Acid Rain Program) and 40 CFR Subpart Da. Specific CEMS information will be provided to FDEP when available.</p>	

Emissions Unit Information Section _____ of _____

Continuous Monitoring System: Continuous Monitor 3 of 5

1. Parameter Code: Flow	2. Pollutant(s):
3. CMS Requirement: 40 CFR Part 75	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): <p style="text-align: center;">Required by 40 CFR Part 75 (Acid Rain Program) and 40 CFR Subpart Da. Specific CEMS information will be provided to FDEP when available.</p>	

Continuous Monitoring System: Continuous Monitor 4 of 5

1. Parameter Code: EM	2. Pollutant(s): NOx
3. CMS Requirement: 40 CFR Part 75	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: TECO Model Number: 42C Serial Number: 42C-73834-374	
5. Installation Date: 06-19-02	6. Performance Specification Test Date: 06-26-02
7. Continuous Monitor Comment (limit to 200 characters): <p style="text-align: center;">Required by 40 CFR Part 75 (Acid Rain Program).</p>	

Emissions Unit Information Section _____ of _____

Continuous Monitoring System: Continuous Monitor 5 of 5

1. Parameter Code: EM	2. Pollutant(s):
3. CMS Requirement: 40 CFR Part 75	[<input checked="" type="checkbox"/>] Rule [<input type="checkbox"/>] Other
4. Monitor Information: Manufacturer: TECO Model Number: 43C Serial Number: 43C-72788-372	
5. Installation Date: 06-19-02	6. Performance Specification Test Date: 06-26-02
7. Continuous Monitor Comment (limit to 200 characters): Required by 40 CFR Part 75 (Acid Rain Program).	

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Mr. Gene L. Ussery
 V.P. of Power Generation/Transmission
 Gulf Power Company
 One Energy Place
 Pensacola, Florida 32520-0328

2. Article Number
 (Transfer from service label)

7001 1140 0002 1578 0874

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature
Theresa Tucker Agent Addressee

B. Received by (Printed Name) C. Date of Delivery
 THERESA TUCKER 4-13-04

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7001 1140 0002 1578 0874

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT**
 (Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE
 Mr. Gene L. Ussery, V.P. of Power Generation

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

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Sent To
 Mr. Gene L. Ussery, V.P. of Power Generation
 Street, Apt. No.;
 or PO Box No. One Energy Place
 City, State, ZIP+4
 Pensacola, Florida 32520-0328

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> <i>R. Beach</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>R-BEACH</i> C. Date of Delivery <i>5-10</i></p>
<p>1. Article Addressed to: Mr. Gene L. Ussery, Jr. V.P. of Power Generation/ Transmission Gulf Power Company One Energy Place Pensacola, Florida 32520-0328</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label) 7000 1670 0013 3109 9656</p>	
<p>PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540</p>	

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee <small>(Endorsement Required)</small>		
Restricted Delivery Fee <small>(Endorsement Required)</small>		
Total Postage & Fees	\$	

9596 6076 3103 0013 1670 0000

Sent To	
Mr. Gene L. Ussery, Jr.	
Street, Apt. No., or PO Box No. One Energy Place	
City, State, ZIP+4	Pensacola, Florida 32520-0328

PS Form 3800, May 2000 See Reverse for Instructions

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

APR 05 2004

BUREAU OF AIR REGULATION



Certified Mail

March 31, 2004

Bruce Mitchell, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

RE: CRIST ELECTRIC GENERATING PLANT
AUTHORIZATION TO CONDUCT CAM PROTOCOL TESTING
PERMIT No: 0330045-001-AV *03 30045-009-AC*

Gulf Power hereby requests authorization to conduct Compliance Assurance Monitoring (CAM) testing at Plant Crist for Unit 7 during 2004. As you are aware, CAM is a requirement that must be addressed in the next round of Title V permit renewals for all facilities having pollution control equipment. In order to meet this goal, Gulf Power is planning a series of special particulate emission tests to calibrate an EPRI (Electric Power Research Institute) computer model to evaluate the performance of the new Crist Unit 7 ESP. Simply stated, this evaluation will require Gulf Power to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate emissions standard.

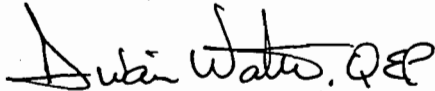
Therefore, Gulf Power requests a permit amendment to allow CAM protocol developmental testing on Crist Unit 7 from June 1 through August 31 as needed to complete all tests and measurements. Authorization of these tests is consistent with the Department's power and duty under Section 403.061(18), Florida Statutes, to "[e]ncourage and conduct studies, investigations, and research relating to pollution and its causes, effects, prevention, abatement, and control."

The specific equipment to be tested is the new Crist Unit 7 electrostatic precipitator. The pollutants and or parameters measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature and other unit specific parameters that are needed for the computer model. Test methods to be utilized include EPA Method 9, EPA Method 17, CEM monitoring data (SO₂, NO_x, CO₂), and particulate size distribution.

Attached is an authorization statement by Gene L. Ussery, Jr., the Responsible Official outlining his approval of this permit amendment request. Also attached is a statement by a professional engineer regarding the certification of the test protocol and schedule. Please note that we recently talked with Andy Allen and the permitting staff at the Northwest Florida District office to outline this request, our test schedule and the basic CAM procedure. Ms. Sandra Veazey and her staff are being copied on this correspondence.

If you have any questions or need further information regarding the test procedures or CAM protocol development for Plant Crist please call me at (850) 444.6527.

Sincerely,



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

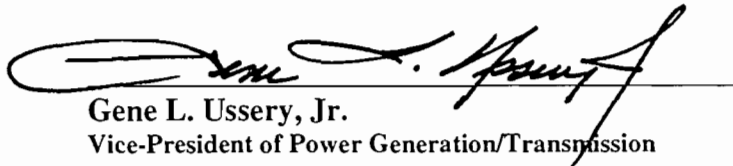
cc: w/att: Jim Vick, Gulf Power Company
Joe Martin, Gulf Power Company
Greg Terry, Gulf Power Company
Terry Wright, Gulf Power Company
Kevin Beaty, Gulf Power Company
Danny Herrin, Southern Company Services
Milan McGill, Southern Company Services
John Dominey, Gulf Power Company

Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida
Mr. Andy Allen, FDEP Northwest District Office, Pensacola, Florida

**CERTIFICATION BY RESPONSIBLE OFFICIAL
CRIST UNIT 7 COMPLIANCE ASSURANCE MONITORING
TEST PERMIT AMENDMENT REQUEST**

“I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Crist Electric Generating Plant for which this permit amendment is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and information contained in this request are true, accurate and complete.”

Responsible Official Signature:

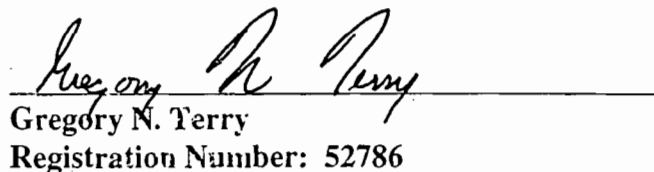

Gene L. Ussery, Jr.
Vice-President of Power Generation/Transmission

3-31-04
Date:

**CRIST UNIT 7 COMPLIANCE ASSURANCE MONITORING
TEST PROTOCOL AND SCHEDULE
CERTIFICATION BY PROFESSIONAL ENGINEER**

“I, the undersigned, am a registered professional engineer in the state of Florida and hereby certify to the best of my knowledge that all information submitted for this permit amendment to conduct special emissions testing for compliance assurance monitoring at the Crist Electric Generating Plant is true, accurate and complete.”

Professional Engineer Signature:


Gregory N. Terry
Registration Number: 52786

3.30.04
Date

INTEROFFICE MEMORANDUM

TO: Michael G. Cooke

THRU: Trina L. Vielhauer
Jim Pennington *JKP*

FROM: Bruce Mitchell *BM*

DATE: May 5, 2004

SUBJECT: Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's Electrostatic Precipitator (ESP) 0330045-007-AC

The proposed project was requested to establish CAM information for the upcoming Title V Permit Renewal for the Crist Electrical Generating Plant. This request regards conducting various pollutant tests and data acquisition from CEMS for defining parameters that will be used for CAM purposes. The Unit #7's ESP is a new control device for the control of particulate matter and opacity.

There were no comments received during the Public Notice period (14-days), which concluded on May 1st. Therefore, it is recommended that the Final air construction permit (authorization letter) be signed as drafted and noticed.

MGC/rbm

Attachments

Mike,
This is a good thing. Gulf is being proactive in getting their CAM plan together. Also, they are thinking ahead & getting construction permit -- they want to test right up to their limits to develop good CAM plan. This is ~~the~~ precautionary in case they exceed design testing.
Trina

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Mr. Gene L. Ussery, Jr.
**V.P. of Power Generation/
 Transmission**
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

2. Article Number
 (Transfer from service label)

7000 1670 0013 3109 9656

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X R. Beach Agent
 Addressee

B. Received by (Printed Name)
R. BEACH C. Date of Delivery
5-10

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7000 1670 0013 3109 9656

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
 Here

Sent To
Mr. Gene L. Ussery, Jr.
 Street, Apt. No. or PO Box No.
One Energy Place
 City, State, ZIP+4
Pensacola, Florida 32520-0328

PS Form 3800, May 2000

See Reverse for Instructions

NOTICE OF FINAL AIR CONSTRUCTION PERMIT

In the Matter of an
Application for Permit:

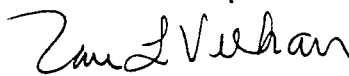
Mr. Gene L. Ussery, Jr.
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Permit Project No.: 0330045-007-AC
Crist Electrical Generating Plant
Escambia County

Enclosed is the Final Air Construction Permit (letter), No. 0330045-007-AC. The proposed project was requested to establish CAM information for the upcoming Title V Permit Renewal for the Crist Electrical Generating Plant. This request regards conducting various pollutant tests and data acquisition from CEMS for defining parameters that will be used for CAM purposes. The Unit #7's ESP is a new control device for the control of particulate matter and opacity. The facility is located in Escambia County. This permit (letter) is issued pursuant to Chapter 403, Florida Statutes (F.S.). There were no comments received during the Public Notice period (14-days).

Any party to this order (permit) has the right to seek judicial review of the permit revision pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

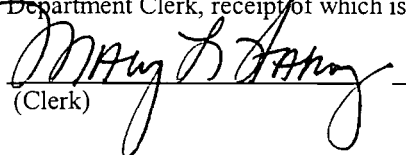
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL AIR CONSTRUCTION PERMIT (including the Final permit (authorization letter)) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 5/7/04 to the person(s) listed or as otherwise noted:

Mr. Gene L. Ussery, Jr. *, Responsible Official and V.P. of Power Generation/Transmission, GPC
Mr. G. Dwain Waters, QEP, Air Quality Programs Supervisor, GPC
Mr. Gregory N. Terry, P.E., GPC
Ms. Sandra Veazey, DEP - NWD
Mr. Kevin White, DEP - NWD
Mr. Andy Allen, DEP - NWD
Mr. Joe Kahn, DEP - BAMMS

Clerk Stamp

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

 5/7/04
(Clerk) (Date)

Final Determination

Gulf Power Company

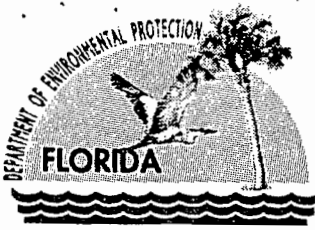
Project No.: 0330045-007-AC

I. Public Notice and Comments.

The Public Notice of the permitting project was published in the Pensacola News Journal on April 17, 2004. There were no written comments received in the commenting period (14-days), which concluded at the close of business of May 1st. Therefore, it is recommended that the Final air construction permit (authorization letter) be issued.

II. Conclusion.

It is recommended to issue the Final air construction permit (authorization letter) as drafted and public noticed.



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

May 6, 2004

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery, Jr.
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Ussery:

RE: Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's Electrostatic Precipitator (ESP)
0330045-007-AC

The Department has reviewed the request that you provided on April 6, 2004. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Crist Electrical Generating Plant's Unit #7's ESP (electrostatic precipitator) located in Pensacola, Escambia County. The purpose is to help the company address Compliance Assurance Monitoring (CAM), which will have to be addressed regarding the ESP upon renewal of their Title V Operation Permit. Paragraph 403.061(16), Florida Statutes (F.S.), authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide reasonable and practical regulatory controls consistent with public interest. The control device's parameters to be assessed and established by the testing will be used to create Unit #7's CAM plan, which will define specific operating parameters, or indicators, that the owner or operator shall use to recognize when corrective actions must be taken to avoid non-compliance with the emission unit's permit limitations.

In accordance with the provisions of Paragraphs 403.061(16) and (18), F.S., and Rule 62-210.700(5), F.A.C., you are hereby authorized to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's ESP. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions and opacity standards. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit #7's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, visible emissions, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air and flue gas temperature, and other unit specific parameters that are needed for the computer model.

"More Protection, Less Process"

Printed on recycled paper.

Mr. Gene L. Ussery, Jr.
Gulf Power Company
Crist Electric Generating Plant: Unit #7
0330045-007-AC
Page Two

The performance tests and parameter measurements or monitoring shall be subject to the following conditions:

1. Unless waived, the permittee shall notify the Department's Northwest District and Bureau of Air Regulation offices at least 15 days prior to commencement of the performance tests and parameter measurements or monitoring. A written report shall be submitted to these offices within 45 days upon completion of the last test run and parameter measurements and monitoring.
2. The authorized testing and measurement and monitoring schedule is from June 1 thru August 31, 2004. If additional time is needed, the permittee shall provide the Department with documentation of the progress accomplished to date and shall identify what is left to be done to complete the testing and measurements or monitoring.
3. The parameters to be measured or monitored are sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), particulate matter, visible emissions, carbon dioxide (CEM), particulate size distribution, ash content of the fuel, ultimate fuel analyses, load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model.
4. Emissions testing shall be conducted for the following pollutants and using the following test methods:
 - a. Particulate matter EPA Test Method 17 (including EPA Test Methods 1 thru 4)
 - b. Visible emissions EPA Test Method 9
5. The release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C., is not authorized for this activity.
6. Performance testing shall immediately cease upon the occurrence of a valid environmental complaint by a citizen or other party, or a nuisance or danger to the public health or welfare. Performance testing shall not resume until appropriate measures to correct the problem have been implemented.
7. The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida.
8. This Department action is just to authorize the performance testing and parameter measurements and monitoring for the Crist Unit #7's ESP for the purpose of developing a CAM protocol.
9. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
10. The Department shall be notified in writing on the date of the last test run and parameter measurement and monitoring completion. If after work hours, notification shall occur on the next work day.

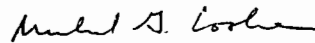
Mr. Gene L. Ussery, Jr.
Gulf Power Company
Crist Electric Generating Plant: Unit #7
0330045-007-AC
Page Three

11. Attachment Section.

- a. Mr. G. Dwain Waters's letter received April 5, 2004.
- b. Public Notice affidavit received April 26, 2004.
- c. Final Determination.

The Department has relied on the information referenced in the Attachment Section and conversations with representatives of Gulf Power Company in authorizing this activity.

Sincerely,



Michael G. Cooke, Director
Division of Air Resource Management

MGC/rbm

Enclosures

cc: Trina Vielhauer, DEP - BAR
Jim Pennington, DEP - BAR
Sandra Veazey, DEP - NWD
Andy Allen, DEP - NWD
Joe Kahn, DEP - BAMMS
G. Dwain Waters, Q.E.P., GPC
Gregory N. Terry, P.E., GPC

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111



Certified Mail

April 22, 2004

Mr. Bruce Mitchell, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

APR 26 2004

BUREAU OF AIR REGULATION

Dear Mr. Mitchell:

RE: CRIST ELECTRIC GENERATION FACILITY
DEP File No. 0330045-007-AC
Air Construction Permit for CAM - Public Notice Affidavit

Thanks for the quick response to Gulf Power's request for an air construction permit to conduct CAM testing at Plant Crist. Enclosed is the proof of publication, i.e., newspaper affidavit regarding the Public Notice of Intent to Issue An Air Construction Permit originally sent to Gene L. Ussery (Gulf Power) on April 8, 2004. The notice was published on April 17, 2004 in the Pensacola News Journal.

Please let me know if you have any questions regarding this matter and if you receive any public comments regarding our request.

Sincerely,

A handwritten signature in black ink that reads "Dwain Waters, Q.E.P." The signature is written in a cursive style.

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

Cc: Jim Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Kevin Beaty, Gulf Power Company
Sandra Veazey, FDEP, Northwest District

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Construction Permit No.: 0330045-007-AC

Gulf Power Company
Crist Electric Generating Plant
Escambia County

BEST AVAILABLE COPY

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit (letter) to Gulf Power Company for its Crist Electric Generating Plant located in Pensacola, Escambia County. The applicant's name and address are: Gene L. Ussery, Jr., V.P. of Power Generation/ Transmission, Gulf Power Company, One Energy Place, Pensacola, Florida 32520-0328.

The permittee, Gulf Power Company, applied on April 5, 2004, for authorization to conduct pollutant testing and parameter measurements for the development of a Compliance Assurance Monitoring (CAM) protocol for the Gulf Power Company's Crist Unit No. 7's ESP (electrostatic precipitator), which is located at the Crist Electric Generating Plant in Pensacola, Escambia County. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions and opacity standards. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit No. 7's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide (CEM (continuous emission monitor)), nitrogen oxides (CEM), particulate matter, visible emissions, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also. The development testing is scheduled to run from June 1 through August 31, 2004.

The permitting authority will issue the Air Construction Permit, and subsequent Final Air Construction Permit, in accordance with the conditions of the Draft Air Construction Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Draft Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

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, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, 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 fourteen 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 applicable 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, Florida Administrative Code (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(s) or identification number(s), if known;
- (b) The name, address and telephone number of the petitioner; 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 petitioner's substantial rights will be affected by the agency determination;
- (c) A statement of how and when the petitioner received notice of the agency action or proposed action;
- (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, as well as the rules and statutes which entitle petitioner to relief; and
- (f) A demand for relief.

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 notice of intent. 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 is not available for this proceeding.
A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Affected District Authority:
Dept. of Environmental Protection
Northwest District Office
Air Resources
160 Governmental Place
Pensacola, Florida 32520-0328
Telephone: 850/595-8300
Fax: 850/595-4417

The complete project file includes the Draft Air Construction Permit, the application/request, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact James K. Pennington, P.E., at the above address, or call 850/921-9515 for additional information.

RECEIVED

APR 26 2004

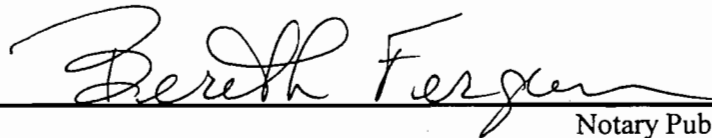
BUREAU OF AIR REGULATION

Published Daily-Pensacola, Escambia County, FL

STATE OF FLORIDA
County of Escambia

Before the undersigned authority, personally appeared NIKKI WINDHAM who is personally known to me and who on oath says that he/she is a representative of The Pensacola News Journal, a daily newspaper published in Pensacola in Escambia County, Florida; that the attached copy of advertisement, being a legal in the matter of **NOTICE OF INTENT** was published in said newspaper in the issues **APRIL 17, 2004**. Affidavit further says that the said Pensacola News Journal is a newspaper published in Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida each day and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and Affidavit further says that he/she has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this **20TH DAY OF APRIL A.D., 2004**.



Notary Public

BERETH FERGUSON
Notary Public-State of FL
My Comm. Expires OCT. 10, 2005
Comm. No. DD048662

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111



Certified Mail

April 22, 2004

Mr. Bruce Mitchell, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

APR 26 2004

BUREAU OF AIR REGULATION

Dear Mr. Mitchell:

RE: CRIST ELECTRIC GENERATION FACILITY
DEP File No. 0330045-007-AC
Air Construction Permit for CAM - Public Notice Affidavit

Thanks for the quick response to Gulf Power's request for an air construction permit to conduct CAM testing at Plant Crist. Enclosed is the proof of publication, i.e., newspaper affidavit regarding the Public Notice of Intent to Issue An Air Construction Permit originally sent to Gene L. Ussery (Gulf Power) on April 8, 2004. The notice was published on April 17, 2004 in the Pensacola News Journal.

Please let me know if you have any questions regarding this matter and if you receive any public comments regarding our request.

Sincerely,

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

Cc: Jim Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Kevin Beaty, Gulf Power Company
Sandra Veazey, FDEP, Northwest District

PENSACOLA
**News
Journal**
Informed. In Tune. In Touch.

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APR 26 2004

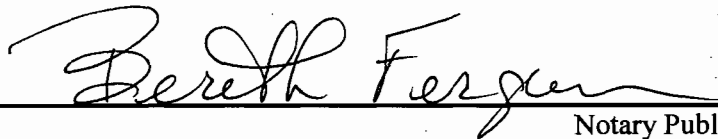
BUREAU OF AIR REGULATION

Published Daily-Pensacola, Escambia County, FL

STATE OF FLORIDA
County of Escambia

Before the undersigned authority, personally appeared NIKKI WINDHAM who is personally known to me and who on oath says that he/she is a representative of The Pensacola News Journal, a daily newspaper published in Pensacola in Escambia County, Florida; that the attached copy of advertisement, being a legal in the matter of **NOTICE OF INTENT** was published in said newspaper in the issues **APRIL 17, 2004**. Affidavit further says that the said Pensacola News Journal is a newspaper published in Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida each day and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and Affidavit further says that he/she has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this **20TH DAY OF APRIL A.D., 2004**.



Notary Public

BERETH FERGUSON
"Notary Public-State of FL"
My Comm. Expires OCT. 10, 2005
Comm. No. DD048662

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

BEST AVAILABLE COPY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Construction Permit No.: 0330045-007-AC
Gulf Power Company
Crist Electric Generating Plant
Escambia County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit (letter) to Gulf Power Company for its Crist Electric Generating Plant located in Pensacola, Escambia County. The applicant's name and address are: Gene L. Ussery, Jr., V.P. of Power Generation/ Transmission, Gulf Power Company, One Energy Place, Pensacola, Florida 32520-0328.

The permittee, Gulf Power Company, applied on April 5, 2004, for authorization to conduct pollutant testing and parameter measurements for the development of a Compliance Assurance Monitoring (CAM) protocol for the Gulf Power Company's Crist Unit No. 7's ESP (electrostatic precipitator), which is located at the Crist Electric Generating Plant in Pensacola, Escambia County. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions and opacity standards. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit No. 7's ESP. The pollutants and/or parameters to be measured or monitored will include sulfur dioxide (CEM (continuous emission monitor)), nitrogen oxides (CEM), particulate matter, visible emissions, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also. The development testing is scheduled to run from June 1 through August 31, 2004.

The permitting authority will issue the Air Construction Permit, and subsequent Final Air Construction Permit, in accordance with the conditions of the Draft Air Construction Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Draft Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

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, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, 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 fourteen 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 applicable 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, Florida Administrative Code (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(s) or identification number(s), if known;
- (b) The name, address and telephone number of the petitioner; 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 petitioner's substantial rights will be affected by the agency determination;
- (c) A statement of how and when the petitioner received notice of the agency action or proposed action;
- (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, as well as the rules and statutes which entitle petitioner to relief; and
- (f) A demand for relief.

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 notice of intent. 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 is not available for this proceeding.
A complete project file is available for public inspection during normal business hours: 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Affected District Authority:
Dept. of Environmental Protection
Northwest District Office
Air Resources
160 Governmental Place
Pensacola, Florida 32520-0328
Telephone: 850/595-8300
Fax: 850/595-4417

The complete project file includes the Draft Air Construction Permit, the application/request, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact James K. Pennington, P.E., at the above address, or call 850/921-9515 for additional information.



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
April 8, 2004

Colleen M. Castille
Secretary

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Re: Request for Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Crist Unit No. 7's Electrostatic Precipitator (ESP)
0330045-007-AC

Dear Mr. Ussery:

Attached is one copy of the proposed authorization, 0330045-007-AC, to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Unit No. 7's ESP, which is located at the Crist Electric Generating Plant in Pensacola, Escambia County. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions and opacity standards. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit No. 7's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), particulate matter, visible emissions, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also. The development testing is scheduled to run from June 1 through August 31, 2004.

The permitting authority's "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" are also included. The "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" must be published as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to James K. Pennington, P.E., at the above letterhead address. If you have any other questions, please contact Bruce Mitchell at 850/413-9198.

Sincerely,

Trina L. Vielhauer
Chief
Bureau of Air Regulation

TLV/BM/m

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permit by:

Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Air Construction Permit No.: 0330045-007-AC
Crist Electric Generating Plant
Escambia County

INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit [copy of the draft permit (letter) enclosed] for the facility detailed in the application specified above, to authorize Gulf Power Company to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Unit No. 7's electrostatic precipitator (ESP), which is located at the Crist Electric Generating Plant in Pensacola, Escambia County.

The permittee, Gulf Power Company, applied on April 5, 2004, for authorization to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Unit No. 7's ESP (electrostatic precipitator), which is located at the Crist Electric Generating Plant in Pensacola, Escambia County. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions and opacity standards. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit No. 7's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), particulate matter, visible emissions, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also. The development testing is scheduled to run from June 1 through August 31, 2004.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4 and 62-210, F.A.C. This source is not exempt from permitting procedures. The permitting authority has determined that an Air Construction Permit is required for the proposed activity.

The permitting authority intends to issue this Air Construction Permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT." The 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. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax: 850/922-6979), within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

The permitting authority will issue the Final Air Construction Permit in accordance with the conditions of the enclosed Draft Air Construction Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

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 (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. A petitioner must 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

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 notice of intent. 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.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

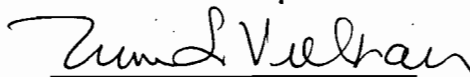
- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



Trina L. Vielhauer
Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE and the Draft Permit (letter)) and all copies were sent by certified mail before the close of business on 4/9/04 to the person(s) listed:

Mr. Gene L. Ussery, Jr., Responsible Official and V.P. of Power Generation/Transmission, GPC

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE and the Draft Permit (letter)) were sent by U.S. mail on the same date to the person(s) listed:

Mr. G. Dwain Waters, QEP, Air Quality Programs Supervisor, GPC
Mr. Gregory N. Terry, P.E., GPC
Ms. Sandra Veazey, DEP - NWD
Mr. Kevin White, DEP - NWD
Mr. Andy Allen, DEP - NWD
Mr. Joe Kahn, DEP - BAMMS

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.

Barbara J. Friday 4/9/04
(Clerk) (Date)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <i>Theresa Tucker</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>
<p>1. Article Addressed to: Mr. Gene L. Ussery V.P. of Power Generation/Transmission Gulf Power Company One Energy Place Pensacola, Florida 32520-0328</p>	<p>B. Received by (Printed Name) <i>THELSON TUCKER</i> C. Date of Delivery <i>4-13-04</i></p> <p>D. Is delivery address different from Item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>2. Article Number (Transfer from service label)</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>7001 1140 0002 1578 0874</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

<p>7001 1140 0002 1578 0874</p> <p>Mr. Gene L. Ussery, V.P. of Power Generation</p>	
<p>Postage \$</p> <p>Certified Fee</p> <p>Return Receipt Fee (Endorsement Required)</p> <p>Restricted Delivery Fee (Endorsement Required)</p> <p>Total Postage & Fees \$</p>	<p>Postmark Here</p>
<p>Sent To Mr. Gene L. Ussery, V.P. of Power Generation Street, Apt. No., or PO Box No. One Energy Place City, State, ZIP+4 Pensacola, Florida 32520-0328</p>	
<p>PS Form 3800, January 2001 See Reverse for Instructions.</p>	

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Construction Permit No.: 0330045-007-AC
Gulf Power Company
Crist Electric Generating Plant
Escambia County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit (letter) to Gulf Power Company for its Crist Electric Generating Plant located in Pensacola, Escambia County. The applicant's name and address are: Gene L. Ussery, Jr., V.P. of Power Generation/Transmission, Gulf Power Company, One Energy Place, Pensacola, Florida 32520-0328.

The permittee, Gulf Power Company, applied on April 5, 2004, for authorization to conduct pollutant testing and parameter measurements for the development of a Compliance Assurance Monitoring (CAM) protocol for the Gulf Power Company's Crist Unit No. 7's ESP (electrostatic precipitator), which is located at the Crist Electric Generating Plant in Pensacola, Escambia County. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions and opacity standards. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit No. 7's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), particulate matter, visible emissions, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also. The development testing is scheduled to run from June 1 through August 31, 2004.

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(b) The name, address and telephone number of the petitioner; 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 petitioner's substantial rights will be affected by the agency determination;

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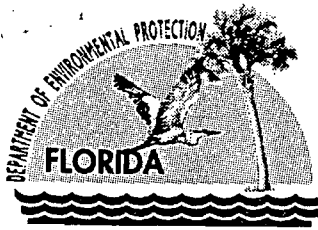
Permitting Authority:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Affected District Authority:

Department of Environmental Protection
Northwest District Office
Air Resources
160 Governmental Place
Pensacola, Florida 32520-0328
Telephone: 850/595-8300
Fax: 850/595-4417

The complete project file includes the Draft Air Construction Permit, the application/request, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact James K. Pennington, P.E., at the above address, or call 850/921-9515 for additional information.



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

Month Day, 2004

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery, Jr.
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Ussery:

RE: Draft Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's Electrostatic Precipitator (ESP)

The Department has reviewed the request that you provided on April 6, 2004. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Crist Electrical Generating Plant's Unit #7's ESP (electrostatic precipitator) located in Pensacola, Escambia County. The purpose is to help the company address Compliance Assurance Monitoring (CAM), which will have to be addressed regarding the ESP upon renewal of their Title V Operation Permit. Paragraph 403.061(16), Florida Statutes (F.S.), authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide reasonable and practical regulatory controls consistent with public interest. The control device's parameters to be assessed and established by the testing will be used to create Unit #7's CAM plan, which will define specific operating parameters, or indicators, that the owner or operator shall use to recognize when corrective actions must be taken to avoid non-compliance with the emission unit's permit limitations.

In accordance with the provisions of Paragraphs 403.061(16) and (18), F.S., and Rule 62-210.700(5), F.A.C., you are hereby authorized to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's ESP. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions and opacity standards. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit #7's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, visible emissions, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air and flue gas temperature, and other unit specific parameters that are needed for the computer model.

"More Protection, Less Process"

Printed on recycled paper.

Mr. Gene L. Ussery, Jr.
Gulf Power Company
Crist Electric Generating Plant: Unit #7
Page Two

The performance tests and parameter measurements or monitoring shall be subject to the following conditions:

1. Unless waived, the permittee shall notify the Department's Northwest District and Bureau of Air Regulation offices at least 15 days prior to commencement of the performance tests and parameter measurements or monitoring. A written report shall be submitted to these offices within 45 days upon completion of the last test run and parameter measurements and monitoring.
2. The authorized testing and measurement and monitoring schedule is from June 1 thru August 31, 2004. If additional time is needed, the permittee shall provide the Department with documentation of the progress accomplished to date and shall identify what is left to be done to complete the testing and measurements or monitoring.
3. The parameters to be measured or monitored are sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), particulate matter, visible emissions, carbon dioxide (CEM), particulate size distribution, ash content of the fuel, ultimate fuel analyses, load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model.
4. Emissions testing shall be conducted for the following pollutants and using the following test methods:
 - a. Particulate matter EPA Test Method 17 (including EPA Test Methods 1 thru 4)
 - b. Visible emissions EPA Test Method 9
5. The release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C., is not authorized for this activity.
6. Performance testing shall immediately cease upon the occurrence of a valid environmental complaint by a citizen or other party, or a nuisance or danger to the public health or welfare. Performance testing shall not resume until appropriate measures to correct the problem have been implemented.
7. The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida.
8. This Department action is just to authorize the performance testing and parameter measurements and monitoring for the Crist Unit #7's ESP for the purpose of developing a CAM protocol.
9. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
10. The Department shall be notified in writing on the date of the last test run and parameter measurement and monitoring completion. If after work hours, notification shall occur on the next work day.

Mr. Gene L. Ussery, Jr.
Gulf Power Company
Crist Electric Generating Plant: Unit #7
Page Three

11. Attachment Section.

- a. Mr. G. Dwain Waters's letter received April 5, 2004.
- [b]. [Final Determination.]

The Department has relied on the information referenced in the Attachment Section and conversations with representatives of Gulf Power Company in authorizing this activity.

Sincerely,

Michael G. Cooke, Director
Division of Air Resource Management

TLV/rbm

Enclosures

cc: Trina Vielhauer, DEP - BAR
Jim Pennington, DEP - BAR
Sandra Veazey, DEP - NWD
Andy Allen, DEP - NWD
Joe Kahn, DEP - BAMMS
G. Dwain Waters, Q.E.P., GPC
Gregory N. Terry, P.E., GPC

INTEROFFICE MEMORANDUM

TO: Trina L. Vielhauer

THRU: Jim Pennington *JKP*

FROM: Bruce Mitchell *BM*

DATE: April 7, 2004

SUBJECT: **Draft** Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's Electrostatic Precipitator (ESP)

The proposed project was requested to establish CAM information for the upcoming Title V Permit Renewals for the Crist Electrical Generating Plant. This request regards conducting various pollutant tests and data acquisition from CEMS for defining parameters that will be used for CAM purposes. The Unit #7's ESP is a new control device for the control of particulate matter and opacity.

It is recommended that the Intent to Issue cover letter be signed.

TLV/rbm

Attachments

Jim / Bruce -

See two tabs but I signed.

Ux!

T

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

APR 05 2004

BUREAU OF AIR REGULATION



Certified Mail

March 31, 2004

Bruce Mitchell, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

RE: CRIST ELECTRIC GENERATING PLANT
AUTHORIZATION TO CONDUCT CAM PROTOCOL TESTING
PERMIT No: 0330045-001-AV *0330045-009-AC*

Gulf Power hereby requests authorization to conduct Compliance Assurance Monitoring (CAM) testing at Plant Crist for Unit 7 during 2004. As you are aware, CAM is a requirement that must be addressed in the next round of Title V permit renewals for all facilities having pollution control equipment. In order to meet this goal, Gulf Power is planning a series of special particulate emission tests to calibrate an EPRI (Electric Power Research Institute) computer model to evaluate the performance of the new Crist Unit 7 ESP. Simply stated, this evaluation will require Gulf Power to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate emissions standard.

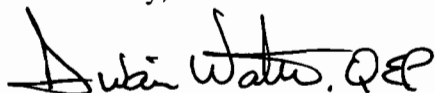
Therefore, Gulf Power requests a permit amendment to allow CAM protocol developmental testing on Crist Unit 7 from June 1 through August 31 as needed to complete all tests and measurements. Authorization of these tests is consistent with the Department's power and duty under Section 403.061(18), Florida Statutes, to "[e]ncourage and conduct studies, investigations, and research relating to pollution and its causes, effects, prevention, abatement, and control."

The specific equipment to be tested is the new Crist Unit 7 electrostatic precipitator. The pollutants and or parameters measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature and other unit specific parameters that are needed for the computer model. Test methods to be utilized include EPA Method 9, EPA Method 17, CEM monitoring data (SO₂, NO_x, CO₂), and particulate size distribution.

Attached is an authorization statement by Gene L. Ussery, Jr., the Responsible Official outlining his approval of this permit amendment request. Also attached is a statement by a professional engineer regarding the certification of the test protocol and schedule. Please note that we recently talked with Andy Allen and the permitting staff at the Northwest Florida District office to outline this request, our test schedule and the basic CAM procedure. Ms. Sandra Veazey and her staff are being copied on this correspondence.

If you have any questions or need further information regarding the test procedures or CAM protocol development for Plant Crist please call me at (850) 444.6527.

Sincerely,



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

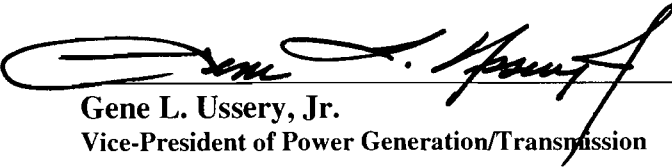
cc: w/att: Jim Vick, Gulf Power Company
Joe Martin, Gulf Power Company
Greg Terry, Gulf Power Company
Terry Wright, Gulf Power Company
Kevin Beaty, Gulf Power Company
Danny Herrin, Southern Company Services
Milan McGill, Southern Company Services
John Dominey, Gulf Power Company

Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida
Mr. Andy Allen, FDEP Northwest District Office, Pensacola, Florida

**CERTIFICATION BY RESPONSIBLE OFFICIAL
CRIST UNIT 7 COMPLIANCE ASSURANCE MONITORING
TEST PERMIT AMENDMENT REQUEST**

“I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Crist Electric Generating Plant for which this permit amendment is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and information contained in this request are true, accurate and complete.”

Responsible Official Signature:


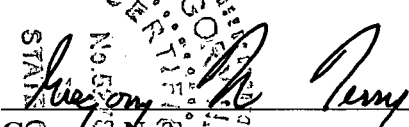

Gene L. Ussery, Jr.
Vice-President of Power Generation/Transmission

3-31-04
Date:

**CRIST UNIT 7 COMPLIANCE ASSURANCE MONITORING
TEST PROTOCOL AND SCHEDULE
CERTIFICATION BY PROFESSIONAL ENGINEER**

“I, the undersigned, am a registered professional engineer in the state of Florida and hereby certify to the best of my knowledge that all information submitted for this permit amendment to conduct special emissions testing for compliance assurance monitoring at the Crist Electric Generating Plant is true, accurate and complete.”

Professional Engineer Signature:

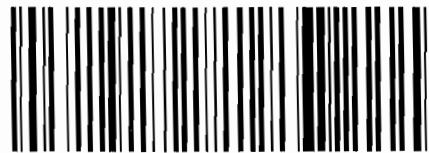


Gregory N. Terry
Registration Number: 52786

3.30.04
Date



One Energy Place
Pensacola FL 32520

CERTIFIED MAIL™



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TALLAHASSEE FL 32300
011601100000

Bruce Mitchell, P. E.
Bureau of Air Regulation, FDEP
2600 Blair Stone Road
Mail Station #5510
Tallahassee, FL 32399-2400

Certified Mail



April 22, 2004

Jonathan Holtom, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

RECEIVED

MAY 03 2004

BUREAU OF AIR REGULATION

Dear Mr. Holtom:

RE: CRIST ELECTRIC GENERATING PLANT
SO2 EMISSION RATE CHANGE REQUEST
PERMIT No: 0330045-001-AV

0330045-004-AC

Gulf Power hereby requests a permit amendment to reduce Plant Crist Title V permit limitations for sulfur dioxide from 5.9 to 2.4 lb/Mbtu as outlined in recent FDEP modeling in order to reduce the possibility of modeled ambient air SO₂ impacts. It is Gulf's understanding that the proposed reduction applies to each of the coal fired units at Plant Crist and that compliance is based on a 24 hour average with certification by stack continuous emission monitors. All existing permit language remains the same except for the numerical limit.

Attached is an authorization statement by Gene L. Ussery, Jr., the Responsible Official outlining his approval of this permit amendment request.

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

Sincerely,

G. Dwain Waters, Q.E.P.

Air Quality Programs Supervisor

cc: w/att: Jim Vick, Gulf Power Company
Joe Martin, Gulf Power Company
Terry Wright, Gulf Power Company
Kevin Beaty, Gulf Power Company
Danny Herrin, Southern Company Services
John Dominey, Gulf Power Company

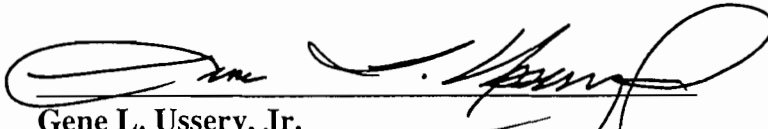
Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida

Mr. Andy Allen, FDEP Northwest District Office, Pensacola, Florida

**CERTIFICATION BY RESPONSIBLE OFFICIAL
CRIST SO₂ PERMIT AMENDMENT REQUEST
April 22, 2004**

“I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Crist Electric Generating Plant for which this permit amendment is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and information contained in this request are true, accurate and complete.”

Responsible Official Signature:


Gene L. Ussery, Jr.
Vice-President of Power Generation/Transmission

4-22-04
Date:

ATTACHMENT GENERAL CONDITIONS

Rule 62-4.160, F.A.C.

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
[Rule 62-4.160(1), F.A.C.]
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
[Rule 62-4.160(2), F.A.C.]
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, 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 or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
[Rule 62-4.160(3), F.A.C.]
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
[Rule 62-4.160(4), F.A.C.]
- G.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.
[Rule 62-4.160(5), F.A.C.]
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
[Rule 62-4.160(6), F.A.C.]
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

[Rule 62-4.160(7), F.A.C.]

- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- [Rule 62-4.160(8), F.A.C.]
- G.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 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- [Rule 62-4.160(9), F.A.C.]
- G.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.
- [Rule 62-4.160(10), F.A.C.]
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- [Rule 62-4.160(11), F.A.C.]
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- [Rule 62-4.160(12), F.A.C.]
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology ()
 - (b) Determination of Prevention of Significant Deterioration (); and
 - (c) Compliance with New Source Performance Standards ().
- [Rule 62-4.160(13), F.A.C.]
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- [Rule 62-4.160(14), F.A.C.]

G.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.
[Rule 62-4.160(15), F.A.C.]

Final Determination

Gulf Power Company

Project No.: 0330045-008-AC

I. Public Notice and Comments.

The Public Notice of the permitting project was published in the Pensacola News Journal on May 23, 2004. There were no written comments received in the commenting period (14-days), which concluded at the close of business of June 6. Therefore, it is recommended that the Final air construction permit (letter) be signed and issued as drafted and Public Noticed.

II. Conclusion.

It is recommended to issue the Final air construction permit (letter) as drafted and Public Noticed.

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

JUN 01 2004

BUREAU OF AIR REGULATION



Certified Mail

May 28, 2004

Mr. Bruce Mitchell, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell: *Bruce*

RE: CRIST ELECTRIC GENERATION FACILITY
DEP File No. 0330045-008-AC
Air Construction Permit for SO2 Permit Limit Reduction - Public Notice Affidavit

Thanks for the quick response to Gulf Power's request for an air construction permit to reduce the SO2 emission limiting standard at Plant Crist. Enclosed is the proof of publication, i.e., newspaper affidavit regarding the Public Notice of Intent to Issue An Air Construction Permit originally sent to Gene L. Ussery (Gulf Power) on May 18, 2004. The notice was published on May 23, 2004 in the Pensacola News Journal.

Please let me know if you have any questions regarding this matter and if you receive any public comments regarding our request.

Sincerely,

G. Dwain Waters, Q.E.P.

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

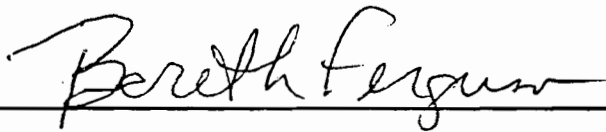
Cc: Jim Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Kevin Beaty, Gulf Power Company
Sandra Veazey, FDEP, Northwest District

Published Daily-Pensacola, Escambia County, FL

STATE OF FLORIDA
County of Escambia

Before the undersigned authority, personally appeared NIKKI WINDHAM who is personally known to me and who on oath says that he/she is a representative of The Pensacola News Journal, a daily newspaper published in Pensacola in Escambia County, Florida; that the attached copy of advertisement, being a legal in the matter of **NOTICE OF INTENT TO ISSUE** was published in said newspaper in the issues **MAY 23, 2004**. Affidavit further says that the said Pensacola News Journal is a newspaper published in Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida each day and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and Affidavit further says that he/she has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this **28TH DAY OF MAY A.D., 2004**.



Notary Public

RECEIVED

JUN 01 2004

BUREAU OF AIR REGULATION

BERETH FERGUSON
"Notary Public-State of FL"
My Comm. Expires OCT. 10, 2005
Comm. No. DD048662

PUBLIC NOTICE OF INTENT TO ISSUE

**STATE OF
DEPARTMENT OF ENVIRO**

Draft Air Construction Permit P
Gulf Power
Crist Electric Ge
Escambia

The Department of Environmental Protection (permitted construction permit (letter) to Gulf Power Company, Pensacola, Escambia County. The applicant's name is Generation/ Transmission, Gulf Power Company, One I

The permittee, Gulf Power Company, applied on May for sulfur dioxide (SO₂) emission limiting standard for Boil (pulverized coal). The allowable SO₂ emission limiting Btu heat input, when burning solid fuel (pulverized coal) heat input, when burning solid fuel (pulverized coal), 2-tufted stack SO₂ continuous emission monitors.

The permitting authority will issue the Air Construction Permit, in accordance with the conditions of the Draft Air Construction Permit, in accordance with the following procedures results in a conditions.

The permitting authority will accept written comment Permit issuance action for a period of 14 (fourteen) days. Ten comments should be provided to the Department Mail Station #5505, Tallahassee, Florida 32399-2400, for public inspection. If written comments received, revision Permit, the permitting authority shall issue a Revised cable, another Public Notice.

A person whose substantial interests are affected by an administrative hearing in accordance with Sections 1. tion must contain the information set forth below and in of the Department of Environmental Protection, 3900 hassee, Florida 32399-3000 (Telephone: 850/488-973 sons other than those entitled to written notice under 5 days of publication of the public notice or within fourteen occurs first. Under Section 120.60(3), F.S., however, a notice of agency action may file a petition within fourteen date of publication. A petitioner shall mail a copy of the above, at the time of filing. The failure of any person to constitute a waiver of that person's right to request actions 120.569 and 120.57, F.S., or to intervene in this subsequent intervention will be only at the approval of the compliance with Rule 28-106.205, Florida Administrative Code.

A petition that disputes the material facts on which the following information:

- The name and address of each agency affected, number(s), if known;
- The name, address and telephone number of the petitioner's representative, if any, which is the course of the proceeding; and an explanation affected by the agency determination;
- A statement of how and when the petitioner requested action;
- A statement of all disputed issues of material fact;
- A concise statement of the ultimate facts alleged by the petitioner to justify relief; and
- A demand for relief.

A petition that does not dispute the material facts upon shall state that no such facts are in dispute and others above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to mean that the permitting authority's final action is notice of intent. Persons whose substantial interests are affected by the permitting authority on the application have the right to participate in accordance with the requirements set forth above.

Mediation is not available for this proceeding. A complete project file is available for public inspection p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

The complete project file includes the Draft Air Construction Permit submitted by the responsible official, exclusive of interested persons may contact James K. Pennington, for additional information.

Legal No. 66586 1T May 23, 2004

**U.S. Postal Service
CERTIFIED MAIL RECEIPT**
(Domestic Mail Only; No Insurance Coverage Provided)

7001 1140 0002 1578 1253

OFFICIAL USE
Mr. Gene L. Ussery, V.P. of Power Generation

Postage	\$
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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

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Sent To

Mr. Gene L. Ussery, V.P. of Power Generation

Street, Apt. No.;
or PO Box No. One Energy Place

City, State, ZIP+4
Pensacola, Florida 32520-0328

PS Form 3800, January 2001

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Mr. Gene L. Ussery
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

2. Article Number
(Transfer from service label)

7001 1140 0002 1578 1253

COMPLETE THIS SECTION ON DELIVERY

A. Signature
Jim Larson Agent Addressee

B. Received by (Printed Name) *Jim Larson* C. Date of Delivery *5/19/04*

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

**U.S. Postal Service
CERTIFIED MAIL RECEIPT**
(Domestic Mail Only; No Insurance Coverage Provided)

7001 1140 0002 1578 1352

OFFICIAL USE
Mr. Gene L. Ussery, Jr., V.P.

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To
Mr. Gene L. Ussery, Jr., V.P.
Street, Apt. No.;
or PO Box No. One Energy Place
City, State, ZIP+ 4
Pensacola, Florida 32520-0328
PS Form 3800, January 2001 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Mr. Gene L. Ussery, Jr.
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

COMPLETE THIS SECTION ON DELIVERY

A. Signature
Theresa Tucker Agent Addressee
B. Received by (Printed Name) **THERESA TUCKER** C. Date of Delivery **7-8-04**
D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.
4. Restricted Delivery? (Extra Fee) Yes

2. Article Number
(Transfer from service label) **7001 1140 0002 1578 1352**

INTEROFFICE MEMORANDUM

TO: Michael Cooke

THRU: Trina Vielhauer
Jim Pennington

FROM: Bruce Mitchell

DATE: June 9, 2004

SUBJECT: Request for a Reduction of the Allowable Sulfur Dioxide (SO₂) Emission Limiting Standard for Boilers Nos. 4, 5, 6 and 7, When Burning Solid Fuel (Pulverized Coal)
Gulf Power Company
Crist Electric Generating Plant
Air Construction Permit Project No.: 0330045-008-AC

The proposed project was requested to establish a reduction of the allowable sulfur dioxide (SO₂) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), and to revise one (1) Specific Condition, specifically No. 5., that was established in air construction permit, No. AC17-234016, for Boiler No. 6. These emissions units are located at the Gulf Power Company's Crist Electric Generating Plant in Pensacola, Escambia County. The allowable SO₂ emissions limiting standard will change from 5.90 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, to 2.40 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, with compliance demonstrated using certified stack SO₂ continuous emission monitors.

There were no comments received during the Public Notice period (14-days). Therefore, it is recommended that the Final permit (letter) be signed as drafted and Public Noticed..

MGC/rbm

Attachments

NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit:

Mr. Gene L. Ussery, Jr.
V.P. of Power Generation
Gulf Power Company
One Energy Place
Pensacola, Florida 32520

DEP File No.: 0330045-008-AC
Escambia County

Enclosed is the Final Air Construction Permit, No. 0330045-008-AC. The subject of the permit (letter) is to establish a reduction of the allowable sulfur dioxide (SO₂) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), and to revise one (1) Specific Condition, specifically No. 5., that was established in air construction permit, No. AC17-234016, for Boiler No. 6. These emissions units are located at the Gulf Power Company's Crist Electric Generating Plant in Pensacola, Escambia County. This permit (letter) is issued pursuant to Chapter 403, Florida Statutes (F.S.). There were no comments received during the Public Notice period.

Any party to this order (permit) has the right to seek judicial review of the permit (letter) pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

Trina L. Vielhauer
Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the Final Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 6/11/04 to the person(s) listed or as otherwise noted:

- Mr. Gene L. Ussery, Jr.*, V.P. of Power Generation, GPC
- Ms. Sandra Veazey, NWD
- Mr. Kevin White, NWD
- Mr. Andy Allen, NWD
- Mr. G. Dwain Waters, QEP, Air Quality Programs Supervisor, GPC

Clerk Stamp

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

(Clerk) Friday 6/11/04 (Date)

**U.S. Postal Service
CERTIFIED MAIL RECEIPT**
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE
Mr. Gene L. Ussery, Jr., V.P.

7001 1140 0002 1578 1352

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To
Mr. Gene L. Ussery, Jr., V.P.
Street, Apt. No.;
or PO Box No. One Energy Place
City, State, ZIP+4
Pensacola, Florida 32520-0328
PS Form 3800, January 2001 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Mr. Gene L. Ussery, Jr.
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

2. Article Number
(Transfer from service label)

7001 1140 0002 1578 1352

COMPLETE THIS SECTION ON DELIVERY

A. Signature
Theresa Tucker Agent Addressee
B. Received by (Printed Name) C. Date of Delivery
THERESA TUCKER 7-8-04
D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

June 10, 2004

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery, Jr.
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Ussery:

RE: Request for a Reduction of the Allowable Sulfur Dioxide Emission Limiting Standard for Boilers Nos. 4, 5, 6 and 7, When Burning Solid Fuel (Pulverized Coal)
Gulf Power Company
Crist Electric Generating Plant
Project No.: 0330045-008-AC

The Department has reviewed the request that you provided on May 3, 2004, which asked for a reduction in the allowable sulfur dioxide (SO₂) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), at Gulf Power Company's Crist Electric Generating Plant. This permitting project establishes an allowable SO₂ emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), and revises one (1) Specific Condition, specifically No. 5, that was established in air construction permit, No. AC17-234016, for Boiler No. 6. Therefore, the following are added and changed:

A. Specific Conditions.

1. The Crist Electric Generating Plant's Boilers Nos. 4, 5, 6 and 7, shall not exceed 2.40 pounds per million Btu heat input, 24-hour average, while burning solid fuel (pulverized coal), with compliance determined by certified stack SO₂ continuous emission monitors.

[Applicant Request; Rules 62-4.070(3), 62-204.220(1) and 62-212.300(1)(b), F.A.C.; and, 0330045-008-AC]

2. All of the terms and conditions of the attached air construction permit, No. AC17-234016, remain the same except for Specific Condition No. 5., as follows:

a. Revision to Specific Condition No. 5., AC17-234016, for Boiler No. 6.

FROM:

The manner, nature, volume and frequency of permitted emissions, applicable emissions limiting standards, if any, and allowable emissions are listed as per FAC Rule 17-210.300(2)(a):

<u>Airborne</u> <u>Contaminant</u> <u>Emitted</u>	<u>FAC Rule</u>	<u>Allowable</u> <u>Emissions</u> <u>T/yr</u>
SO ₂	17-296.405(1)(c)2c	87035 ²

² Based on steady-state operating parameters, application to construct and rule: SO₂ emissions shall not exceed 5.90 pounds per million Btu heat input.

Mr. Gene L. Ussery, Jr.
Gulf Power Company: Crist Electric Generating Plant
Boilers Nos. 4, 5, 6 and 7
Project No.: 0330045-008-AC
Page 2 of 2

TO:

The manner, nature, volume and frequency of permitted emissions, applicable emissions limiting standards, if any, and allowable emissions are listed as per Rule 62-210.300(2)(a), F.A.C.:

<u>Airborne</u> <u>Contaminant</u> <u>Emitted</u>	<u>FAC Rule</u>	<u>Allowable</u> <u>Emissions</u> <u>T/yr</u>
SO ₂	62-296.405(1)(c)2.c.	38945 ²

² Based on steady-state operating parameters, application to construct and rule:
SO₂ emissions shall not exceed 2.40 pounds per million Btu heat input, 24-hour average, for the coal-fired emissions unit.

[Applicant Request; Rules 62-4.070(3), 62-204.220(1) and 62-212.300(1)(b), F.A.C.; and, 0330045-008-AC]

3. ATTACHMENT GENERAL CONDITIONS is a part of this permit (letter) and incorporated by reference.

B. Attachment Section.

- a. Air construction permit, No. AC17-234016, dated October 7, 1993.
- b. Mr. G. Dwain Waters's letter received May 3, 2004.
- c. ATTACHMENT GENERAL CONDITIONS.
- d. Public Notice affidavit received June 1, 2004.
- e. Final Determination.

The Department has relied on the information referenced in the Attachment Section and conversations with representatives of Gulf Power Company in making this permitting action.

Sincerely,



Michael G. Cooke, Director
Division of Air Resource Management

MGC/rbm

Enclosures

cc: Trina Vielhauer, DEP - BAR
Jonathan Holtom, DEP - BAR
Sandra Veazey, DEP - NWD
G. Dwain Waters, Q.E.P., GPC

Jim Pennington, DEP - BAR
Cleve Holladay, DEP - BAR
Andy Allen, DEP - NWD

F



Florida Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AC17-234016
Date of Issue: October 7, 1993
Expiration Date: December 1, 1994
County: Escambia
Latitude/Longitude: 30°33'57"N/87°13'29.5"W
Project: Electrostatic Precipitator, Crist 6

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Construction of a replacement Electrostatic Precipitator (ESP), for Crist Unit No. 6. The new ESP will reduce PM emissions by 922 T/yr. The coal-fired power boiler (Crist No. 6) is used to supply steam for the generation of 320 MW of electricity.

Emissions of particulates will be controlled by the ESP, Wheelabrator model HaRDE. The ESP has a PM removal efficiency of 99.6% at full load flow conditions of 1,325,820 ACFM. Emissions of sulfur dioxide are controlled by the sulfur content of the coal. Continuous emissions monitoring systems for opacity, sulfur dioxide, nitrogen oxides and oxygen are installed. Collected fly ash and bottom ash generated by the combustion of fossil fuels are to be disposed of in an on-site permitted landfill.

Located: Gulf Power Crist Plant, Ten Mile Road, on Governor's Bayou, north of Pensacola.

Specific Condition No. 2 requires notification upon commencement of construction. Projects beyond one year require annual status reports.

Specific Condition No. 2 also requires notification and prior approval of any changes or revisions made during construction.

Specific Condition No. 18 requires submittal of certificate of completion of construction with appropriate fee within 75 days after completion of construction.

Specific Condition No. 18 also requires obtaining an operating permit before the expiration date (December 1, 1994) of this construction permit for continued operation.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AC17-234016
Date of Issue: October 7, 1993
Expiration Date: December 1, 1994

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. The Department shall be notified upon commencement of construction. The Department shall be notified and prior approval shall be obtained of any substantial changes or revisions made during construction. Projects beyond one year require annual status reports.
3. The nameplate capacity is 320 MW net output of electricity based on the maximum fuel consumption of 3368 MBtu/hr input as measured by average fuel heating values. This is the operating rate at which compliance with standards shall be demonstrated. The maximum allowable heat input is that heat input necessary to maintain electrical load output at 110 percent of nameplate capacity or the level at which the most recent successful emissions compliance test was conducted. If the test was conducted at less than 90 percent of nameplate capacity of the unit, permittee may operate the unit at loads up to the nameplate capacity for purposes of preparation for testing for up to ten calendar days. The Department shall be advised in writing prior to each testing.
4. The Electrostatic Precipitator, and Crist Unit 6 may operate continuously, i.e., 8760 hrs/yr.
5. The manner, nature, volume and frequency of permitted emissions, applicable emissions limiting standards, if any, and allowable emissions are listed as per FAC Rule 17-210.300(2)(a):

<u>Airborne Contaminant Emitted</u>	<u>FAC Rule</u>	<u>Allowable Emissions T/yr</u>
PM	17-296.405(1)(b)	1475 ¹
SO ₂	17-296.405(1)(c)2c	87035 ²
Objectionable Odors	17-296.320(2)	None allowed off plant property, ³
VE	17-296.405(1)(a)	40% opacity ³

- 1 Based on steady-state operating parameters, application to construct and rule:
PM emissions shall not exceed 0.1 pounds per million Btu heat input.
- 2 Based on steady-state operating parameters, application to construct and rule:
SO₂ emissions shall not exceed 5.90 pounds per million Btu heat input.
- 3 Department order dated May 12, 1988.

6. Excess emissions as stated in FAC Rule 17-210.700 shall be allowed. The steady-state hourly emission rate allowable for PM listed in Specific Condition #5 shall not apply during soot-blowing or load changes. However, PM emissions shall not exceed an average of 0.3 lb/MMBtu heat input (equivalent to 1011 lb/hr allowable emissions - steady state) during the 3-hour excess emissions period allowed by 17-210.700 (ref. FAC rule 17-210.700(3)).

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AC17-234016
Date of Issue: October 7, 1993
Expiration Date: December 1, 1994

SPECIFIC CONDITIONS:

7. Excess emissions are defined as:

- A. Any six-minute average for opacity which exceeds the standard.
- B. Any 24-hour average for sulfur dioxide which exceeds the standard.

8. The Department shall be notified as soon as possible (by telephone) of excess emissions that are beyond the allowances of FAC Rule 17-210.700, such as:

A. Any soot blowing or load changes that cause excess visible emissions for a period longer than three hours, or that exceed 60 percent opacity (six minute average) more than four times in any one day.

B. Any malfunction that causes excess visible emissions for a period longer than two hours in any one day.

C. A 24-hour average of SO₂ emissions measured by the continuous monitor that exceeds the standard, or daily average SO₂ emissions measured by coal analysis (in the event the permittee chooses) that exceeds the standard.

Immediately upon notification of excess emissions that are beyond the allowances, the permittee shall take the necessary steps to determine the cause and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation with corrective action to avoid recurrence.

9. A log shall be maintained showing the duration, magnitude and cause of excess visible emissions, and of excess SO₂ emissions.

10. A quarterly report of excess emissions shall be submitted within 30 days following the end of each calendar quarter. The report shall consist of each individual exceedance of opacity or SO₂ emissions (specific Conditions 7 and 8) with duration, magnitude and cause. Any exceedance that is beyond the allowances of FAC Rule 17-210.700 shall be highlighted with note indicating compliance with specific condition 8. A continuous emissions monitor quarterly summary report shall be submitted for each CEM.

11. A maintenance log of the continuous monitoring system shall be kept showing time out of service, and calibrations and adjustments.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AC17-234016
Date of Issue: October 7, 1993
Expiration Date: December 1, 1994

SPECIFIC CONDITIONS:

12. Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with the table below. Such tests shall be scheduled within 30 days after construction is completed. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.

<u>Pollutant</u>	<u>Test Method</u>
PM	DEP method 1, 2, 3, and 17
VE	DEP method 9

The VE test shall be conducted during one of the PM test runs. Test reports shall comply with F.A.C. Rule 17-297.570, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 17-297.340(2). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

13. Immediately upon notification of a particulate test report that fails to demonstrate compliance with the particulate emission limit of 0.1 pounds per million Btu heat input, the permittee shall take necessary steps to determine the cause of the test failure and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation and a schedule for retesting when the cause of the test failure has been determined and corrected.
14. Boilers No. 6 and 7 use a common stack. Visible emission violations from this stack shall be attributed to both boilers unless opacity meter results show the specific boiler causing the violation.
15. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standard of the Department (specific condition 5). A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emission standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the permittee has verified the problem or no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO₂ emission compliance by the temporary use of a spare SO₂ emission monitor. The spare SO₂ emission monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AC17-234016
Date of Issue: October 7, 1993
Expiration Date: December 1, 1994

SPECIFIC CONDITIONS:

16. The permittee shall develop and implement a QC program. As a minimum, the QC program must include written procedures which should describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. Calibration Drift determination and adjustment of CEMS.
3. Preventive maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling and analysis methods.
6. Program of corrective action for malfunctioning CEMS.

17. The applicant shall retain a Professional Engineer, registered in the State of Florida, for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to the permit application and associated documents. A Certificate of Completion [Form DEP 17-1.202(3) attached] shall be submitted with the compliance test results and appropriate fee as application for an operation permit. These are to be submitted within 75 days after completion of construction. The permittee shall obtain an operating permit for this source before the expiration of this construction permit if the permittee desires to continue operation.

18. All fugitive dust generated at this site shall be adequately controlled.

19. The permanent source identification number for this point source is 10PEN17004506. Please cite this number on all test reports and other correspondence specific to this permitted point source.

20. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 436-8364 during normal working hours.

Expiration Date:

December 1, 1994

Issued this 7th day of October,
1993.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

JUN 01 2004

BUREAU OF AIR REGULATION



Certified Mail

May 28, 2004

Mr. Bruce Mitchell, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell: *Bruce*

RE: CRIST ELECTRIC GENERATION FACILITY
DEP File No. 0330045-008-AC
Air Construction Permit for SO2 Permit Limit Reduction - Public Notice Affidavit

Thanks for the quick response to Gulf Power's request for an air construction permit to reduce the SO2 emission limiting standard at Plant Crist. Enclosed is the proof of publication, i.e., newspaper affidavit regarding the Public Notice of Intent to Issue An Air Construction Permit originally sent to Gene L. Ussery (Gulf Power) on May 18, 2004. The notice was published on May 23, 2004 in the Pensacola News Journal.

Please let me know if you have any questions regarding this matter and if you receive any public comments regarding our request.

Sincerely,

G. Dwain Waters, Q.E.P.

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

Cc: Jim Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Kevin Beaty, Gulf Power Company
Sandra Veazey, FDEP, Northwest District

PENSACOLA
News Journal
Informed. In Tune. In Touch.

Published Daily-Pensacola, Escambia County, FL

STATE OF FLORIDA
County of Escambia

Before the undersigned authority, personally appeared **NIKKI WINDHAM** who is personally known to me and who on oath says that he/she is a representative of The Pensacola News Journal, a daily newspaper published in Pensacola in Escambia County, Florida; that the attached copy of advertisement, being a legal in the matter of **NOTICE OF INTENT TO ISSUE** was published in said newspaper in the issues **MAY 23, 2004**. Affidavit further says that the said Pensacola News Journal is a newspaper published in Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida each day and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and Affidavit further says that he/she has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this **28TH DAY OF MAY A.D., 2004**.

Bereth Ferguson

Notary Public

RECEIVED

JUN 01 2004

BERETH FERGUSON
Notary Public-State of FL
My Comm. Expires OCT. 10, 2005
Comm. No. DD048662

BUREAU OF AIR REGULATION

PUBLIC NOTICE OF INTENT TO ISSUE

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Construction Permit for
Gulf Power Company
Crist Electric Generation Station
Escambia County, Florida

The Department of Environmental Protection (DEP) is issuing a draft air construction permit (letter) to Gulf Power Company, Pensacola, Escambia County. The applicant's name is Gulf Power Company, Generation/Transmission, Gulf Power Company, One E. The permittee, Gulf Power Company, applied on May 14, 2004, for a sulfur dioxide (SO₂) emission limiting standard for Bolk (pulverized coal). The allowable SO₂ emission limiting Btu heat input, when burning solid fuel (pulverized coal) heat input, when burning solid fuel (pulverized coal), 24-hourly stack SO₂ continuous emission monitors.

The permitting authority will issue the Air Construction Permit in accordance with the conditions of the Draft Air Construction Permit with the following procedures results in a final permit.

The permitting authority will accept written comment Permit Issuance action for a period of 14 (fourteen) days. Comments should be provided to the Department, Mail Station #5505, Tallahassee, Florida 32399-2400, for public inspection. If written comments received, the Permit, the permitting authority shall issue a Revised Permit, another Public Notice.

A person whose substantial interests are affected by an administrative hearing in accordance with Sections 120.01 through 120.05 of the Department of Environmental Protection, 3900 Tallahassee, Florida 32399-3000 (Telephone: 850/488-9733) persons other than those entitled to written notice under 9 days of publication of the public notice or within fourteen days of publication of the public notice or within fourteen days of publication of the public notice, F.S., however, notice of agency action may file a petition within fourteen days of publication. A petitioner shall mail a copy of the petition above, at the time of filing. The failure of any person to constitute a waiver of that person's right to request actions 120.569 and 120.57, F.S., or to intervene in this proceeding intervention will be only at the approval of the permitting authority with Rule 28-106.205, Florida Administrative Code. A petition that disputes the material facts on which the permitting authority is based shall contain the following information:

- (a) The name and address of each agency affected and the number(s), if known.
- (b) The name, address and telephone number of the petitioner, the petitioner's representative, if any, which is the course of the proceeding, and an explanation of the agency determination.
- (c) A statement of how and when the petitioner requests relief.
- (d) A statement of all disputed issues of material fact.
- (e) A concise statement of the ultimate facts alleged by the petitioner to relief; and
- (f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority is based shall state that no such facts are in dispute and otherwise as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to mean that the permitting authority's final action is based on the notice of intent. Persons whose substantial interests will be affected by the permitting authority on the application have the right to participate in the proceeding in accordance with the requirements set forth above.

Mediation is not available for this proceeding. A complete project file is available for public inspection, Monday through Friday, except legal holidays, at:

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

The complete project file includes the Draft Air Construction Permit, information submitted by the responsible official, exclusive of confidential information. Interested persons may contact James K. Pennington, for additional information.

Legal No: 66586-1T May 23, 2004



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

P.E. Certification Statement

Permittee:

Gulf Power Company
Crist Electric Generating Plant

DRAFT Permit No.: 0330045-008-AC

Project: Air Construction Permit for Sulfur Dioxide (SO₂) Limitation for the Emissions Units Burning Solid Fuel (Pulverized Coal)

This facility consists of seven fossil fuel fired steam generators (boilers) and two fly ash silos. Boilers 4 and 5 are substitution Acid Rain Phase I Units. Boilers 6 and 7 are Acid Rain Phase I Units. All seven boilers will be subject to the Acid Rain Phase II requirements. Natural gas is the primary fuel for boilers 1, 2 and 3. Pulverized coal is the primary fuel for boilers 4, 5, 6 and 7. Fuel oil is used as supplemental fuel in all seven of the boilers. Emissions unit number -001 is a Riley front wall-fired, dry bottom boiler designated as "Boiler Number 1". It is rated at a maximum heat input of 420 million Btu per hour (MMBtu/hour) when firing natural gas and 320 MMBtu/hour when firing fuel oil. Natural gas is the primary fuel. Emissions unit number -002 is a Riley front wall-fired, dry bottom boiler designated as "Boiler Number 2". It is rated at a maximum heat input of 420 MMBtu/hour when firing natural gas and 320 MMBtu/hour when firing fuel oil. Natural gas is the primary fuel. Emissions unit number -003 is a Riley front wall-fired, dry bottom boiler designated as "Boiler Number 3". It is rated at a maximum heat input of 550 million Btu per hour (MMBtu/hour) when firing natural gas and/or fuel oil. Natural gas is the primary fuel. All three units are regulated under Acid Rain, Phase II. These emissions units pre-date PSD regulations, but are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Fired Steam Generators with more than 250 million Btu per Hour Heat Input. Emissions from these boilers are uncontrolled.

Emissions unit number -004 is a Combustion Engineering tangentially fired, dry bottom boiler designated as "Boiler Number 4". It is rated at a maximum heat input of 1,096.7 million Btu per hour (MMBtu/hour) when firing pulverized coal, natural gas or distillate No. 2 fuel oil (used as back-up fuel). Emissions unit number -005 is a Combustion Engineering tangentially fired, dry bottom boiler designated as "Boiler Number 5". It is rated at a maximum heat input of 1,096.7 million Btu per hour (MMBtu/hour) when firing pulverized coal, natural gas or distillate No. 2 fuel oil (used as back-up fuel). Both units are Phase I Substitution and Phase II Acid Rain Units. These emissions units pre-date PSD regulations, but are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Fired Steam Generators with more than 250 million Btu per Hour Heat Input. PM emissions from units -004 and -005 are controlled by hot side (Buell Model # Bal. 2x34n333-4-3p) and cold side (Buell Model # 1.1x48k33-1p) electrostatic precipitators.

Emissions unit number -006 is a Foster Wheeler front wall fired, dry bottom boiler designated as "Boiler Number 6". It is rated at a maximum heat input of 3,704.8 million Btu per hour (MMBtu/hour) when firing pulverized coal, natural gas or distillate fuel oil (used as back-up fuel). Emissions unit number -007 is a Foster Wheeler front and rear wall fired, dry bottom boiler designated as "Boiler Number 7". It is rated at a maximum heat input of 6,406.4 million Btu per hour (MMBtu/hour) when firing pulverized coal, natural gas or distillate fuel oil (used as back-up fuel). These emissions units are regulated under Acid Rain, Phase I. These emissions units pre-date PSD regulations, but are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Fired Steam Generators with more than 250 million Btu per Hour Heat Input. PM emissions from unit -006 are controlled by a cold side electrostatic precipitator (Wheelabrator Model # HarDE). PM emissions from unit -007 are controlled by cold side Buell electrostatic precipitators. NO_x emissions from units -006 and -007 are controlled by Foster Wheeler Low NO_x Burners. Emissions unit -006 contains a PM limitation of 1,475 tons per year. This limit was established by a construction permit that was issued (in 1993) to install a new electrostatic precipitator. It was calculated based on the allowable emission limit, the maximum demonstrated heat input rate at that time, and the assumption of continuous operation (8,760 hours per year).

"More Protection, Less Process"



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

P.E. Certification Statement (Continued)

Permittee:

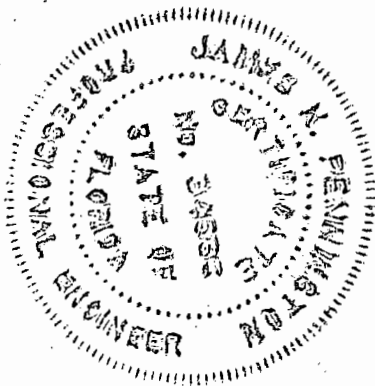
Gulf Power Company
Crist Electric Generating Plant

DRAFT Permit No.: 0330045-008-AC

Project: Air Construction Permit for Sulfur Dioxide (SO₂) Limitation for the Emissions Units Burning Solid Fuel (Pulverized Coal)

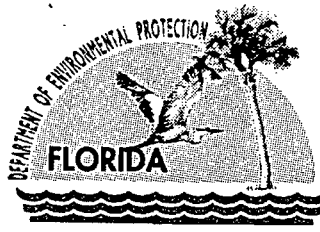
I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through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

This draft permit was prepared under my direct supervision by Mr. Bruce Mitchell of my staff.



James K. Pennington 5/18/04
James K. Pennington, P.E. date
Registration Number: 34536

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0144
Fax: 850/922-6979



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

May 18, 2004

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Re: Request for a Reduction of the Allowable Sulfur Dioxide (SO₂) Emission Limiting Standard for Boilers Nos. 4, 5, 6 and 7,
When Burning Solid Fuel (Pulverized Coal)
Gulf Power Company
Crist Electric Generating Plant
Draft Air Construction Permit Project No.: 0330045-008-AC

Dear Mr. Ussery:

Attached is one copy of the Draft air construction permit (letter), Project No. 0330045-008-AC, to establish a reduction of the allowable sulfur dioxide (SO₂) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), and to revise one (1) Specific Condition, specifically No. 5., that was established in air construction permit, No. AC17-234016, for Boiler No. 6. These emissions units are located at the Gulf Power Company's Crist Electric Generating Plant in Pensacola, Escambia County. The allowable SO₂ emission limiting standard will change from 5.90 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, to 2.40 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, with compliance determined by certified stack SO₂ continuous emission monitors.

The permitting authority's "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" are also included. The "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" must be published as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to James K. Pennington, P.E., at the above letterhead address. If you have any other questions, please contact Bruce Mitchell at 850/413-9198.

Sincerely,

Trina L. Vielhauer
Chief
Bureau of Air Regulation

TLV/BM/m

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permit by:

Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Draft Air Construction Permit Project No.: 0330045-008-AC
Crist Electric Generating Plant
Escambia County

INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit [copy of the Draft permit (letter) enclosed] for the facility detailed in the application specified above, to establish a reduction of the allowable sulfur dioxide (SO₂) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), and to revise one (1) Specific Condition, specifically No. 5., that was established in air construction permit, No. AC17-234016, for Boiler No. 6. The emissions units are located at the Gulf Power Company's Crist Electric Generating Plant in Pensacola, Escambia County.

The permittee, Gulf Power Company, applied on May 3, 2004, requesting a reduction in the allowable sulfur dioxide (SO₂) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal). The allowable SO₂ emission limiting standard will change from 5.90 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, to 2.40 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, with compliance determined by certified stack SO₂ continuous emission monitors.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4 and 62-210, F.A.C. This source is not exempt from permitting procedures. The permitting authority has determined that an Air Construction Permit is required for the proposed activity.

The permitting authority intends to issue this Air Construction Permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT." The 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. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax: 850/922-6979), within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

The permitting authority will issue the Final Air Construction Permit in accordance with the conditions of the enclosed Draft Air Construction Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit (letter) with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

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 (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the

public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. A petitioner must 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

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 notice of intent. 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.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

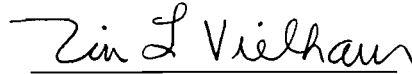
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental

Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



Trina L. Vielhauer
Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE and the Draft Permit (letter)) and all copies were sent by certified mail before the close of business on 5/18/04 to the person(s) listed:

Mr. Gene L. Ussery, Jr., Responsible Official and V.P. of Power Generation/Transmission, GPC

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE and the Draft Permit (letter)) were sent by U.S. mail on the same date to the person(s) listed:

- Mr. G. Dwain Waters, QEP, Air Quality Programs Supervisor, GPC
- Ms. Sandra Veazey, DEP - NWD
- Mr. Kevin White, DEP - NWD
- Mr. Andy Allen, DEP - NWD
- Mr. Jim Pennington, P.E., DEP - BAR
- Mr. Jonathan Holtom, DEP - BAR
- Mr. Cleve Holladay, DEP - BAR

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.

Paulina J. Friday 5/18/04
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Construction Permit Project No.: 0330045-008-AC
Gulf Power Company
Crist Electric Generating Plant
Escambia County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit (letter) to Gulf Power Company for its Crist Electric Generating Plant located in Pensacola, Escambia County. The applicant's name and address are: Gene L. Ussery, Jr., V.P. of Power Generation/Transmission, Gulf Power Company, One Energy Place, Pensacola, Florida 32520-0328.

The permittee, Gulf Power Company, applied on May 3, 2004, requesting a reduction in the allowable sulfur dioxide (SO₂) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal). The allowable SO₂ emission limiting standard will change from 5.90 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, to 2.40 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, with compliance determined by certified stack SO₂ continuous emission monitors.

The permitting authority will issue the Air Construction Permit, and subsequent Final Air Construction Permit, in accordance with the conditions of the Draft Air Construction Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Draft Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

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, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, 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 fourteen 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 applicable 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, Florida Administrative Code (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(s) or identification number(s), if known;
- (b) The name, address and telephone number of the petitioner; 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 petitioner's substantial rights will be affected by the agency determination;
- (c) A statement of how and when the petitioner received notice of the agency action or proposed action;
- (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, as well as the rules and statutes which entitle petitioner to relief; and

(f) A demand for relief.

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 notice of intent. 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 is not available for this proceeding.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Affected District Authority:

Department of Environmental Protection
Northwest District Office
Air Resources
160 Governmental Place
Pensacola, Florida 32520-0328
Telephone: 850/595-8300
Fax: 850/595-4417

The complete project file includes the Draft Air Construction Permit, the application/request, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact James K. Pennington, P.E., at the above address, or call 850/921-9515 for additional information.

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7001 1140 0002 1578 1253

Mr. Gene L. Ussery, V.P. of Power Generation

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To
 Mr. Gene L. Ussery, V.P. of Power Generation
 Street, Apt. No.;
 or PO Box No. One Energy Place
 City, State, ZIP+4
 Pensacola, Florida 32520-0328

See Reverse for Instructions.

PS Form 3800, January 2001

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> <i>Jim Carson</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery <i>Jim Carson</i> <i>5/19/04</i></p>
<p>1. Article Addressed to: Mr. Gene L. Ussery V.P. of Power Generation/Transmission Gulf Power Company One Energy Place Pensacola, Florida 32520-0328</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7001 1140 0002 1578 1253</p>

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

Gulf Power Company
Crist Electric Generating Plant
Facility ID No.: 0330045
Escambia County

Draft Air Construction Permit Project No.: 0330045-008-AC

Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation

1. APPLICATION INFORMATION.

1.1. Applicant Name and Address:

Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Responsible Official

Mr. Gene L. Ussery, Jr., V.P. of Power Generation/Transmission

1.2. Reviewing and Process Schedule:

05/03/2004: Date of Receipt of Application

2. FACILITY INFORMATION.

2.1. Facility Location

The Gulf Power Company's Crist Electric Generating Plant is located at 500 Bay Front Parkway, Pensacola, Escambia County, Florida.

The UTM: coordinates of this facility are Zone 16; 478.50 km East; and, 3381.30 km North.

2.2. Standard Industrial Classification Code (SIC):

Major Group No.	49	Electric, Gas, and Sanitary Services
Group No.	491	Electric Services
Industry No.	4911	Electric Services

2.3. Facility Category

The Gulf Power Company's Crist Electric Generating Plant is classified as a major air pollutant emitting facility pursuant to Rule 62-210.200, F.A.C. - Definitions. This facility is classified as a Title V - Title IV facility and its initial Title V - Title IV Air Operation Permit was effective on January 1, 2000.

3. PROJECT DESCRIPTION.

3.1. The permittee, Gulf Power Company, applied to the Department on May 3, 2004, requesting a reduction in the allowable sulfur dioxide (SO₂) emission limiting standard for the emissions units, Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal) at the Crist Electric Generating Plant located in Pensacola, Escambia County. The allowable SO₂ emission limiting standard will change from 5.90 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, to 2.40 pounds per million Btu heat input, when burning solid fuel (pulverized coal), 24-hour average, with compliance determined by certified stack SO₂ continuous emission monitors.

The permitting authority intends to issue the Air Construction Permit based on the belief that reasonable assurances have been provided to indicate that operation of the facility will not adversely impact air quality, and the facility will be in compliance with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

4. RULE APPLICABILITY.

The proposed project is not subject to preconstruction review requirements under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, because the request is for a reduction in the allowable SO₂ emission limits for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal). Therefore, the proposed project is not a modification by definition because it is not a change in the method of operation nor is there an actual emissions increase.

In accordance with Rule 62-204.340, F.A.C., this facility is located in an Attainment Area (Escambia County) for all pollutants. The proposed project is subject to permitting under Rule 62-212.300, F.A.C., Permits Required, for purposes of establishing federal enforceability of the proposed new allowable SO₂ emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), and revising one (1) Specific Condition, specifically No. 5., that was established in air construction permit, No. AC17-234016, for Boiler No. 6.

5. SOURCE IMPACT ANALYSIS.

5.1. Emission Limitations:

This permitting action is for the reduction of the SO₂ allowable emission limitation for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal).

5.2. Control Technology Review:

A control technology review is not required under this permitting action.

5.3. Air Quality:

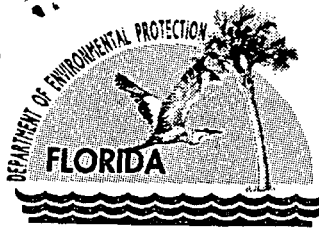
Preliminary modeling was done prior to this request being submitted. That modeling shows that the resulting facility, due to this permitting project, does not cause or contribute to a violation of any air quality standard or increment.

6. CONCLUSION.

Based on the foregoing technical evaluation, the Department has made a preliminary determination that the proposed project will be in compliance with all applicable state and federal air pollution regulations. The requested changes are provided in the attached proposed Draft air construction permit (letter).

Permit Engineer: Bruce Mitchell

Reviewed and Approved by James K. Pennington, P.E.



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

Month Day, 2004

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery, Jr.
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

DRAFT

Dear Mr. Ussery:

RE: Request for a Reduction of the Allowable Sulfur Dioxide Emission Limiting Standard for Boilers Nos. 4, 5, 6 and 7, When Burning Solid Fuel (Pulverized Coal)
Gulf Power Company
Crist Electric Generating Plant
Project No.: 0330045-008-AC

The Department has reviewed the request that you provided on May 3, 2004, which asked for a reduction in the allowable sulfur dioxide (SO₂) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), at Gulf Power Company's Crist Electric Generating Plant. This permitting project establishes an allowable SO₂ emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), and revises one (1) Specific Condition, specifically No. 5, that was established in air construction permit, No. AC17-234016, for Boiler No. 6. Therefore, the following are added and changed:

A. Specific Conditions.

1. The Crist Electric Generating Plant's Boilers Nos. 4, 5, 6 and 7, shall not exceed 2.40 pounds per million Btu heat input, 24-hour average, while burning solid fuel (pulverized coal), with compliance determined by certified stack SO₂ continuous emission monitors.

[Applicant Request; Rules 62-4.070(3), 62-204.220(1) and 62-212.300(1)(b), F.A.C.; and, 0330045-008-AC]

2. All of the terms and conditions of the attached air construction permit, No. AC17-234016, remain the same except for Specific Condition No. 5., as follows:

a. Revision to Specific Condition No. 5., AC17-234016, for Boiler No. 6.

FROM:

The manner, nature, volume and frequency of permitted emissions, applicable emissions limiting standards, if any, and allowable emissions are listed as per FAC Rule 17-210.300(2)(a):

Airborne Contaminant Emitted	FAC Rule	Allowable Emissions T/yr
SO ₂	17-296.405(1)(c)2c	87035 ²

² Based on steady-state operating parameters, application to construct and rule: SO₂ emissions shall not exceed 5.90 pounds per million Btu heat input.

Mr. Gene L. Ussery, Jr.
Gulf Power Company: Crist Electric Generating Plant
Boilers Nos. 4, 5, 6 and 7
Project No.: 0330045-008-AC
Page 2 of 2

TO:

The manner, nature, volume and frequency of permitted emissions, applicable emissions limiting standards, if any, and allowable emissions are listed as per Rule 62-210.300(2)(a), F.A.C.:

<u>Airborne</u> <u>Contaminant</u> <u>Emitted</u>	<u>FAC Rule</u>	<u>Allowable</u> <u>Emissions</u> <u>T/yr</u>
SO ₂	62-296.405(1)(c)2.c.	38945 ²

² Based on steady-state operating parameters, application to construct and rule:
SO₂ emissions shall not exceed 2.40 pounds per million Btu heat input, 24-hour average, for the coal-fired emissions unit.

[Applicant Request; Rules 62-4.070(3), 62-204.220(1) and 62-212.300(1)(b), F.A.C.; and, 0330045-008-AC]

3. ATTACHMENT GENERAL CONDITIONS is a part of this permit (letter) and incorporated by reference.

B. Attachment Section.

- a. Air construction permit, No. AC17-234016, dated October 7, 1993.
- b. Mr. G. Dwain Waters's letter received May 3, 2004.
- c. ATTACHMENT GENERAL CONDITIONS.
- [d]. Public Notice affidavit received **Month Day**, 2004.
- [e]. [Final Determination.]

The Department has relied on the information referenced in the Attachment Section and conversations with representatives of Gulf Power Company in making this permitting action.

Sincerely,

Michael G. Cooke, Director
Division of Air Resource Management

MGC/rbm

Enclosures

cc: Trina Vielhauer, DEP - BAR
Jonathan Holtom, DEP - BAR
Sandra Veazey, DEP - NWD
G. Dwain Waters, Q.E.P., GPC

Jim Pennington, DEP - BAR
Cleve Holladay, DEP - BAR
Andy Allen, DEP - NWD

ATTACHMENT GENERAL CONDITIONS

Rule 62-4.160, F.A.C.

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
[Rule 62-4.160(1), F.A.C.]
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
[Rule 62-4.160(2), F.A.C.]
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, 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 or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
[Rule 62-4.160(3), F.A.C.]
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
[Rule 62-4.160(4), F.A.C.]
- G.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.
[Rule 62-4.160(5), F.A.C.]
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
[Rule 62-4.160(6), F.A.C.]
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

[Rule 62-4.160(7), F.A.C.]

- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- [Rule 62-4.160(8), F.A.C.]
- G.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 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- [Rule 62-4.160(9), F.A.C.]
- G.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.
- [Rule 62-4.160(10), F.A.C.]
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- [Rule 62-4.160(11), F.A.C.]
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- [Rule 62-4.160(12), F.A.C.]
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology ()
 - (b) Determination of Prevention of Significant Deterioration (); and
 - (c) Compliance with New Source Performance Standards ().
- [Rule 62-4.160(13), F.A.C.]
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- [Rule 62-4.160(14), F.A.C.]

G.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.
[Rule 62-4.160(15), F.A.C.]

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

Certified Mail

April 22, 2004

Jonathan Holtom, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400



RECEIVED

MAY 03 2004

BUREAU OF AIR REGULATION

Dear Mr. Holtom:

RE: CRIST ELECTRIC GENERATING PLANT
SO2 EMISSION RATE CHANGE REQUEST
PERMIT No: 0330045-001-AV

0330045-008-AC

Gulf Power hereby requests a permit amendment to reduce Plant Crist Title V permit limitations for sulfur dioxide from 5.9 to 2.4 lb/Mbtu as outlined in recent FDEP modeling in order to reduce the possibility of modeled ambient air SO₂ impacts. It is Gulf's understanding that the proposed reduction applies to each of the coal fired units at Plant Crist and that compliance is based on a 24 hour average with certification by stack continuous emission monitors. All existing permit language remains the same except for the numerical limit.

Attached is an authorization statement by Gene L. Ussery, Jr., the Responsible Official outlining his approval of this permit amendment request.

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

Sincerely,

G. Dwain Waters, Q.E.P.

Air Quality Programs Supervisor

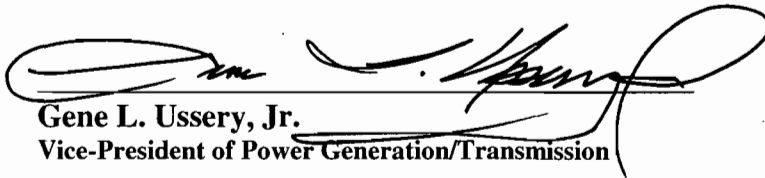
cc: w/att: Jim Vick, Gulf Power Company
Joe Martin, Gulf Power Company
Terry Wright, Gulf Power Company
Kevin Beaty, Gulf Power Company
Danny Herrin, Southern Company Services
John Dominey, Gulf Power Company

Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida
Mr. Andy Allen, FDEP Northwest District Office, Pensacola, Florida

**CERTIFICATION BY RESPONSIBLE OFFICIAL
CRIST SO₂ PERMIT AMENDMENT REQUEST
April 22, 2004**

“I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Crist Electric Generating Plant for which this permit amendment is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and information contained in this request are true, accurate and complete.”

Responsible Official Signature:


Gene L. Ussery, Jr.
Vice-President of Power Generation/Transmission

4-22-04
Date:

Florida Department of
Environmental Protection

Memorandum

TO: Michael G. Cooke

THRU: Trina Vielhauer
Jim Pennington *JKP*

FROM: Jonathan Holtom *J.H.*

DATE: November 8, 2004

SUBJECT: Final Construction Permit for Gulf Power Crist Electric Generating Plant

Attached for approval and signature is a Final construction permit for Gulf Power Company's Crist Electric Generating plant. This permitting project establishes the compliance method for the permitted capacity as the use of composite fuel samples taken by on-site personnel, and to clarify that the 2.40 lb/MMBtu SO₂ limit applies to all fuels.

The Public Notice requirements were met on October 6, 2004, by publishing in The Pensacola News Journal. No comments have been received from the public in response to this Public Notice, and no petitions were filed for an Administrative Hearing.

I recommend your approval and signature.

Attachments

/jh

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

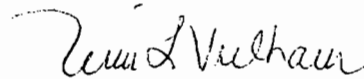
Gene L. Ussery, Jr.
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0100

DEP File No. 0330045-010-AC
Crist Electric Generating Plant
Escambia County

Enclosed is Final Permit Number 0330045-010-AC. This permit authorizes Gulf Power Company to establish the compliance method for the permitted capacity as the use of composite fuel samples taken by on-site personnel, and to clarify that the 2.40 lb/MMBtu SO₂ limit applies to all fuels. This permit is issued pursuant to Chapter 403, Florida Statutes.

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 thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

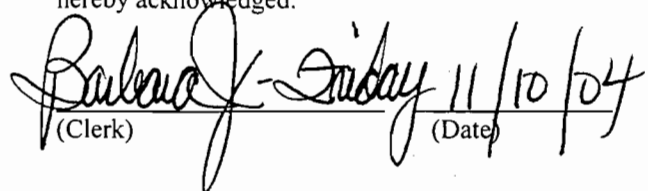
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were electronically mailed by Internet e-mail before the close of business on 11/10/04 to the person(s) listed:

Mr. Kennard Kosky, P.E., (kkosky@golder.com)
Mr. Kevin White, P.E., DEP-NWD (kevin.white@dep.state.fl.us)
Mr. G. Dwain Waters, QEP, Gulf Power Company (GDWATERS@southernco.com)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk) 11/10/04 (Date)

FINAL DETERMINATION

Gulf Power Company
Crist Electric Generating Plant
DEP File No. 0330045-010-AC

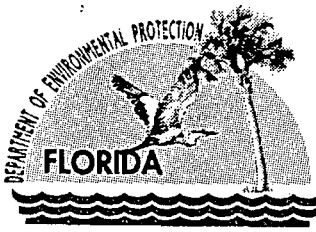
The Department distributed a public notice package on September 20, 2004, to establish the compliance method for the permitted capacity as the use of composite fuel samples taken by on-site personnel, and to clarify that the 2.40 lb/MMBtu SO₂ limit applies to all fuels at the Gulf Power Crist Electric Generating Plant, which is located on Pate Road, off of 10 Mile Road on Governors Bayou, Escambia County. The Public Notice of Intent to Issue was published in The Pensacola News Journal on October 6, 2004.

COMMENTS/CHANGES

No comments were received by the Department in response to the Draft permit and Public Notice.

CONCLUSION

The final action of the Department is to issue the final permit as it was noticed.



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

November 8, 2004

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery, Jr.
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Ussery:

RE: Correction to the Allowable Sulfur Dioxide Emission Limiting Standard for Boilers Nos. 4, 5, 6 and 7
Gulf Power Company - Crist Electric Generating Plant
Project No.: 0330045-010-AC

The Department has determined that a minor correction needs to be made to the allowable sulfur dioxide limitation that was imposed with permit 0330045-008-AC in order to remove the possibility of an exceedance of the ambient air quality standards for sulfur dioxide. Permit 0330045-008-AC imposed an allowable sulfur dioxide (SO₂) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), at Gulf Power Company's Crist Electric Generating Plant. This permitting project makes a correction to clarify that the limit of 2.40 lbs/MMBtu should have been imposed on all fuels, and establishes the compliance method for the permitted capacity as the use of daily fuel samples taken by Gulf Power.

1. Other Permits. The conditions of this permit supplement all previously issued air construction and operation permits for this facility. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations.

[Rule 62-4.070, F.A.C.]

2. To correct the SO₂ limitation from "solid fuels" to "all fuels", Specific Condition 1., of Permit 0330045-008-AC, is changed:

FROM:

1. The Crist Electric Generating Plant's Boilers Nos. 4, 5, 6 and 7, shall not exceed 2.40 pounds per million Btu heat input, 24-hour average, while burning solid fuel (pulverized coal), with compliance determined by certified stack SO₂ continuous emission monitors.

[Applicant Request; Rules 62-4.070(3), 62-204.220(1) and 62-212.300(1)(b), F.A.C.; and, 0330045-008-AC]

TO:

1. The Crist Electric Generating Plant's Boilers Nos. 4, 5, 6 and 7, shall not exceed a maximum of 2.40 pounds per million Btu heat input, 24-hour average, with compliance determined by certified stack SO₂ continuous emission monitors.

[Applicant Request; Rules 62-4.070(3), 62-204.220(1) and 62-212.300(1)(b), F.A.C.; and, 0330045-008-AC]

3. To establish the method for demonstrating compliance with the permitted capacity as the use of the on-site composite fuel samples, the following condition is added.

"More Protection, Less Process"

Printed on recycled paper.

Permitted Capacity. The maximum operation heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
-002	420	Natural Gas
	320	No. 2 Fuel Oil
	320	No. 6 Fuel Oil
	320	On-Specification Used Oil
-003	550	Natural Gas
	550	No. 2 Fuel Oil
	550	No. 6 Fuel Oil
	550	On-Specification Used Oil
-004	1,096.7	Coal
	1,096.7	Natural Gas
	1,096.7	No. 2 Fuel Oil
	1,096.7	On-Specification Used Oil
-005	1,096.7	Coal
	1,096.7	Natural Gas
	1,096.7	No. 2 Fuel Oil
	1,096.7	On-Specification Used Oil
-006	3,704.8	Coal
	3,704.8	Natural Gas
	714.8	No. 2 Fuel Oil
	714.8	On-Specification Used Oil
-007	6,406.4	Coal
	6,406.4	Natural Gas
	1,282	No. 2 Fuel Oil
	1,282	On-Specification Used Oil

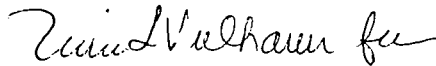
Note: When a blend of fuels are fired, the heat input shall be prorated based on the percent heat input of each fuel.

Compliance with the above heat input limitations shall be demonstrated solely through the use of the composite fuel samples taken by on-site personnel. Records of the composite samples (typically taken daily as-fired for solid fuel and per shipment (after blending) for liquid fuel) shall be maintained on-site for a period of five years and shall be made available for Department inspection upon request.

[Applicant Request; and, Rule 62-4.070, F.A.C.]

4. ATTACHMENT GENERAL CONDITIONS is a part of this permit (letter) and incorporated by reference.

Sincerely,



Michael G. Cooke, Director
Division of Air Resource Management

MGC/jkh

Enclosures

cc: Trina Vielhauer, DEP - BAR
Bruce Mitchell, DEP - BAR
Sandra Veazey, DEP - NWD
G. Dwain Waters, Q.E.P., GPC

Jim Pennington, DEP - BAR
Cleve Holladay, DEP - BAR
Andy Allen, DEP - NWD

ATTACHMENT GENERAL CONDITIONS

Rule 62-4.160, F.A.C.

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
[Rule 62-4.160(1), F.A.C.]
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
[Rule 62-4.160(2), F.A.C.]
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, 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 or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
[Rule 62-4.160(3), F.A.C.]
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
[Rule 62-4.160(4), F.A.C.]
- G.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.
[Rule 62-4.160(5), F.A.C.]
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
[Rule 62-4.160(6), F.A.C.]
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.
[Rule 62-4.160(7), F.A.C.]

- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- [Rule 62-4.160(8), F.A.C.]
- G.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 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- [Rule 62-4.160(9), F.A.C.]
- G.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.
- [Rule 62-4.160(10), F.A.C.]
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- [Rule 62-4.160(11), F.A.C.]
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- [Rule 62-4.160(12), F.A.C.]
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology ()
 - (b) Determination of Prevention of Significant Deterioration (); and
 - (c) Compliance with New Source Performance Standards ().
- [Rule 62-4.160(13), F.A.C.]
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- [Rule 62-4.160(14), F.A.C.]

- G.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.
[Rule 62-4.160(15), F.A.C.]

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

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

2. Article Number (Copy from service label)

7000 0600 0026 4129 8863

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) *B. Ace* B. Date of Delivery *11-15-04*

C. Signature *B. Ace* Agent Addressee

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type

- Certified Mail Express Mail
- Registered Return Receipt for Merchandise
- Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

Gene L. Ussery, Jr.

Postage \$

Certified Fee

Return Receipt Fee (Endorsement Required)

Restricted Delivery Fee (Endorsement Required)

Total Postage & Fees \$

Postmark Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)

Gene L. Ussery, Jr.

Street, Apt. No., or PO Box No.

One Energy Place

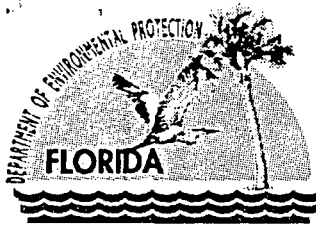
City, State, ZIP+4

Pensacola, Florida 32520-0100

PS Form 3800, February 2000

See Reverse for Instructions

7000 0600 0026 4129 8863



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

September 20, 2004

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

Re: Revised Air Construction Permit, DRAFT Permit No.: 0330045-010-AC
Title V Air Operation Permit Renewal, DRAFT Permit No.: 0330045-009-AV
Crist Electric Generating Plant

Dear Mr. Ussery:

One copy of the combined Public Notice, the Draft Air Construction Permit, and the DRAFT Title V Air Operation Permit Renewal for the Crist Electric Generating Plant located on Pate Road, off of 10 Mile Road on Governors Bayou, Escambia County, is enclosed. The permitting authority's "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" are also included.

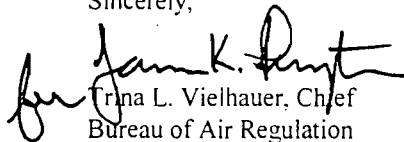
An electronic version of the DRAFT Permits have been posted on the Division of Air Resource Management's World Wide Web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

"<http://www.dep.state.fl.us/air/eproducts/ards/default.asp>".

The "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" must be published as soon as possible upon receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit revision.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to James K. Pennington, P.E., at the above letterhead address. If you have any other questions, please contact Jonathan Holtom, P.E., at 850/921-9531.

Sincerely,


Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/jkp/h

Enclosures

cc: U.S. EPA, Region 4 (INTERNET E-mail)

"More Protection. Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permits by:

Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0100

Draft Air Construction Permit No.: 0330045-010-AC
DRAFT Title V Air Operation Permit No.: 0330045-009-AV
Crist Electric Generating Plant
Escambia County

INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an Air Construction permit and a Title V Air Operation Permit Renewal (copies of the Draft Air Construction Permit and DRAFT Title V Air Operation Permit attached) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Gulf Power Company, applied on June 22, 2004, to the permitting authority for a Title V Air Operation Permit Renewal for the Crist Electric Generating Plant located on Pate Road, off of 10 Mile Road on Governors Bayou, Escambia County.

The Air Construction Permit Revision is being issued to make a minor correction the SO₂ emissions limit and to establish the method of compliance with the heat input limitations as the use of the on-site composite fuel sampling.

The Title V Air Operation Permit Renewal is being issued to allow continued commercial operation of the facility, as authorized by the initial Title V Air Operation Permit 0330045-001-AV, and as revised by Air Construction Permit 0330045-010-AC.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-212, 62-213 and 62-214. This source is not exempt from construction and Title V permitting procedures. The permitting authority has determined that an Air Construction Permit and a Title V Air Operation Permit are required to commence or continue operations at the described facility.

The permitting authority intends to issue the Air Construction Permit and the Title V Air Operation Permit based on the belief that reasonable assurances have been provided to indicate that the construction activity and operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT." The 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. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit revision. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-1344; Fax: 850/922-6979), within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit revision pursuant to Rule 62-110.106, F.A.C.

The permitting authority will issue the Air Construction Permit and the PROPOSED Title V Air Operation Permit and subsequent FINAL Title V Air Operation Permit, in accordance with the conditions of the attached Draft Air Construction Permit and the DRAFT Title V Air Operation Permit unless a response received

Note to Permittee: This page is part of the Notice of Intent, NOT the Public Notice.
DO NOT PROVIDE THE NOTICE OF INTENT TO THE NEWSPAPER FOR PUBLICATION!

in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of the “PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION.” Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

The permitting authority will accept written comments concerning the proposed Title V Air Operation Permit issuance action for a period of 30 (thirty) days from the date of publication of the “PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT.” Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Title V Air Operation Permit, the permitting authority shall issue a Revised DRAFT Title V Air Operation Permit and require, if applicable, another Public Notice.

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 (received) 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 permit revision applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, 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 fourteen 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 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 how and when each petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action 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

notice of intent. 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 will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

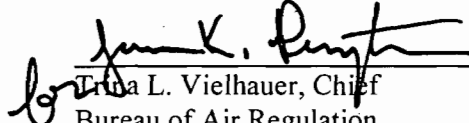
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any Permit. Any petition shall be based only on objections to the permit revision that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at: <http://www.epa.gov/region4/air/permits/Florida.htm>.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT Permits) and all copies were sent by certified mail before the close of business on 9/20/04 to the person(s) listed:

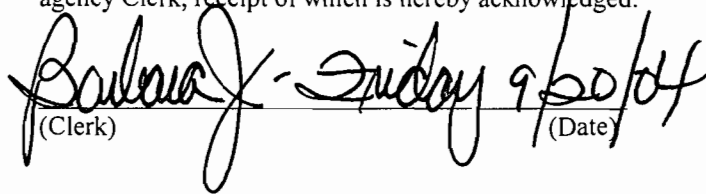
Mr. Gene L. Ussery, Jr.

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT Permits) were sent by INTERNET E-mail on the same date to the person(s) listed:

Mr. Kennard Kosky, P.E. (kkosky@golder.com)
Mr. Kevin White, P.E., DEP-NWD (kevin.white@dep.state.fl.us)
Mr. G. Dwain Waters, QEP, Gulf Power Company (GDWATERS@southernco.com)
U.S. EPA, Region 4

Clerk Stamp

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



(Clerk) Friday 9/20/04 (Date)

**PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR
OPERATION PERMIT**

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Construction Permit No.: 0330045-010-AC
DRAFT Title V Air Operation Permit No.: 0330045-009-AV

Gulf Power Company – Crist Electric Generating Plant
Escambia County

Applicant: The applicant for this project is Gulf Power Company, One Energy Place, Pensacola, Florida 32520-0100. The applicant's responsible official is Mr. Gene L. Ussery, Jr., VP Power Generation.

Facility Location: The applicant operates a coal-fired electric generating plant, which is located on Pate Road, off of 10 Mile Road on Governors Bayou, Escambia County.

Project: The applicant submitted an application for a Title V Air Operation Permit renewal. This facility consists of six active fossil fuel fired steam generators (boilers) and two fly ash silos. The facility is permitted to combust coal as the primary fuel and natural gas and distillate fuel oil as back-up fuel. The six boilers are regulated under Acid Rain Phase II. This permit will be a renewal Title V air operation permit for this facility.

Also include in this permitting action is an Air Construction Permit Revision, which is being issued to make a minor correction the SO₂ emissions limit and to establish the method of compliance with the heat input limitations as the use of the on-site composite fuel sampling.

Permitting Authority: Applications for Air Construction Permits and for Title V Air Operation Permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-213 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 operate the facility. The Department of Environmental Protection is the Permitting Authority responsible for making a permit determination regarding this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: Department of Environmental Protection, 2600 Blair Stone Road, Mail Station #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 address indicated above for the Permitting Authority. The complete project file includes the Draft Permits, the Statement of Basis, 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 and phone number listed above or at the following email address: jonathan.holtom@dep.state.fl.us. A copy of the complete project file is also available at the Department of Environmental Protection's Northwest District Office at 160 Governmental Center, Pensacola, Florida 32501-5794 (Telephone: 850/595-8364).

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an Air Construction Permit and a Title V Air Operation Permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Air Construction Permit, a Proposed Title V Air Operation Permit and subsequent Final Title V Air Operation Permit in accordance with the conditions of the Draft Permits unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the Draft Air Construction Permit for a period of fourteen (14) days from the date of publication of this Public Notice. The Permitting Authority will accept written comments concerning the Draft Title V Air Operation Permit for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the Department's official web site for notices (<http://tlhora6.dep.state.fl.us/onw/>) and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the Draft Permits, the Permitting Authority shall revise the Draft Permits 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 at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (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 fourteen (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 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 how and when the petitioner received notice of the agency action or proposed action; (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; 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. 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.

Objections: In addition to the above right to petition, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) days of the expiration of the

Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding objections, visit the EPA Region 4 web site at: www.epa.gov/region4/air/permits.



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

P.E. Certification Statement

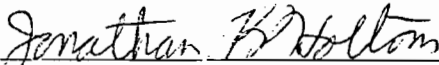
Permittee:

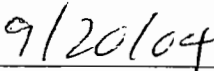
Gulf Power Company
Crist Electric Generating Plant

DRAFT Construction Permit No.: 0330045-010-AC
Facility ID No.: 0330045

Project: Air Construction Permit Revision

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


Jonathan K. Holtom, P.E.
Registration Number: 0052664


Date

Permitting Authority:

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114
Fax: 850/922-6979

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Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

September 20, 2004

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery, Jr.
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

DRAFT

Dear Mr. Ussery:

RE: Correction to the Allowable Sulfur Dioxide Emission Limiting Standard for Boilers Nos. 4, 5, 6 and 7
Gulf Power Company - Crist Electric Generating Plant
Project No.: 0330045-010-AC

The Department has determined that a minor correction needs to be made to the allowable sulfur dioxide limitation that was imposed with permit 0330045-008-AC in order to remove the possibility of an exceedance of the ambient air quality standards for sulfur dioxide. Permit 0330045-008-AC imposed an allowable sulfur dioxide (SO₂) emission limiting standard for Boilers Nos. 4, 5, 6 and 7, when burning solid fuel (pulverized coal), at Gulf Power Company's Crist Electric Generating Plant. This permitting project makes a correction to clarify that the limit of 2.40 lbs/MMBtu should have been imposed on all fuels, and establishes the compliance method for the permitted capacity as the use of daily fuel samples taken by Gulf Power.

1. Other Permits. The conditions of this permit supplement all previously issued air construction and operation permits for this facility. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations.

[Rule 62-4.070, F.A.C.]

2. To correct the SO₂ limitation from "solid fuels" to "all fuels", Specific Condition 1., of Permit 0330045-008-AC, is changed:

FROM:

1. The Crist Electric Generating Plant's Boilers Nos. 4, 5, 6 and 7, shall not exceed 2.40 pounds per million Btu heat input, 24-hour average, while burning solid fuel (pulverized coal), with compliance determined by certified stack SO₂ continuous emission monitors.

[Applicant Request; Rules 62-4.070(3), 62-204.220(1) and 62-212.300(1)(b), F.A.C.; and, 0330045-008-AC]

TO:

1. The Crist Electric Generating Plant's Boilers Nos. 4, 5, 6 and 7, shall not exceed a maximum of 2.40 pounds per million Btu heat input, 24-hour average, with compliance determined by certified stack SO₂ continuous emission monitors.

[Applicant Request; Rules 62-4.070(3), 62-204.220(1) and 62-212.300(1)(b), F.A.C.; and, 0330045-008-AC]

3. To establish the method for demonstrating compliance with the permitted capacity as the use of the on-site composite fuel samples, the following condition is added.

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Permitted Capacity. The maximum operation heat input rate is as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
-002	420	Natural Gas
	320	No. 2 Fuel Oil
	320	No. 6 Fuel Oil
	320	On-Specification Used Oil
-003	550	Natural Gas
	550	No. 2 Fuel Oil
	550	No. 6 Fuel Oil
	550	On-Specification Used Oil
-004	1,096.7	Coal
	1,096.7	Natural Gas
	1,096.7	No. 2 Fuel Oil
	1,096.7	On-Specification Used Oil
-005	1,096.7	Coal
	1,096.7	Natural Gas
	1,096.7	No. 2 Fuel Oil
	1,096.7	On-Specification Used Oil
-006	3,704.8	Coal
	3,704.8	Natural Gas
	714.8	No. 2 Fuel Oil
	714.8	On-Specification Used Oil
-007	6,406.4	Coal
	6,406.4	Natural Gas
	1,282	No. 2 Fuel Oil
	1,282	On-Specification Used Oil

Note: When a blend of fuels are fired, the heat input shall be prorated based on the percent heat input of each fuel.

Compliance with the above heat input limitations shall be demonstrated solely through the use of the composite fuel samples taken by on-site personnel. Records of the composite samples (typically taken daily as-fired for solid fuel and per shipment (after blending) for liquid fuel) shall be maintained on-site for a period of five years and shall be made available for Department inspection upon request.

[Applicant Request; and, Rule 62-4.070, F.A.C.]

4. ATTACHMENT GENERAL CONDITIONS is a part of this permit (letter) and incorporated by reference.

Sincerely,

Michael G. Cooke, Director
Division of Air Resource Management

MGC/jkh

Enclosures

cc: Trina Vielhauer, DEP - BAR
Bruce Mitchell, DEP - BAR
Sandra Veazey, DEP - NWD
G. Dwain Waters, Q.E.P., GPC

Jim Pennington, DEP - BAR
Cleve Holladay, DEP - BAR
Andy Allen, DEP - NWD

ATTACHMENT GENERAL CONDITIONS

Rule 62-4.160, F.A.C.

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
[Rule 62-4.160(1), F.A.C.]
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
[Rule 62-4.160(2), F.A.C.]
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, 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 or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
[Rule 62-4.160(3), F.A.C.]
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
[Rule 62-4.160(4), F.A.C.]
- G.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.
[Rule 62-4.160(5), F.A.C.]
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
[Rule 62-4.160(6), F.A.C.]
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.
[Rule 62-4.160(7), F.A.C.]

- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- [Rule 62-4.160(8), F.A.C.]
- G.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 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- [Rule 62-4.160(9), F.A.C.]
- G.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.
- [Rule 62-4.160(10), F.A.C.]
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- [Rule 62-4.160(11), F.A.C.]
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- [Rule 62-4.160(12), F.A.C.]
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology ()
 - (b) Determination of Prevention of Significant Deterioration (); and
 - (c) Compliance with New Source Performance Standards ().
- [Rule 62-4.160(13), F.A.C.]
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- [Rule 62-4.160(14), F.A.C.]

- G.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.
[Rule 62-4.160(15), F.A.C.]

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Received by (Please Print Clearly) <u>B. Date of Delivery</u> <u>B. Hice</u> <u>11-15-04</u></p> <p>C. Signature <input checked="" type="checkbox"/> <u>B. Hice</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Gene L. Ussery, Jr. Gulf Power Company One Energy Place Pensacola, Florida 32520-0100</p>	<p>3. Service Type</p> <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Copy from service label) 7000 0600 0026 4129 8863</p>	
<p>PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789</p>	

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8863

Gene L. Ussery, Jr.

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Recipient's Name (Please Print Clearly) (to be completed by mailer)

Gene L. Ussery, Jr.

Street, Apt. No.; or PO Box No.

One Energy Place

City, State, ZIP+4

Pensacola, Florida 32520-0100

PS Form 3800, February 2000
See Reverse for Instructions

Florida Department of
Environmental Protection

Memorandum

TO: Michael G. Cooke

THRU: Trina Vielhauer *T*
J. K. Pennington *JKP*

FROM: Michael P. Halpin *MH*

DATE: March 18, 2005

SUBJECT: Gulf Power Company
Crist Unit 5 – Mercury Research Center (MerRC)

Attached for approval and signature is a construction permit for the subject facility. The permit provides an authorization of a temporary research center for evaluating mercury (Hg) emission reduction techniques. This is an existing facility and neither a PSD Review nor a new determination of Best Available Control Technology (BACT) was required as a result of this request.

The project was noticed in the Pensacola News Journal on March 3, 2005 and no comments were received.

I recommend your approval and signature.

Attachments

/mph



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

March 18, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gene L. Ussery
V.P. Power Generation
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0110

File No. 0330045-011-AC
SIC No. 4911
Expires: April 1, 2010

Re: Crist Mercury Research Center (MerRC)

Dear Mr. Ussery:

The Department has reviewed the request from Gulf Power received on January 25, 2005 concerning the construction of a temporary research center for evaluating mercury (Hg) emission reduction techniques. As indicated in the application, research has shown that pollution control technologies designed to control NO_x, SO₂, and PM can affect overall Hg performance. In order to investigate these relationships, Gulf Power is planning a 5 MW equivalent slip-stream facility equipped with a complete system of flue gas cleanup technologies at Crist Unit 5, located in Escambia County, Florida. The proposed slip-stream facility will incorporate a Selective Catalytic Reduction (SCR) system, a rotary air-heater, an electrostatic precipitator (ESP), a baghouse (BH), and a wet flue gas desulphurization (FGD) system. Based upon information provided by the applicant and pursuant to the applicant's request, the Department has determined that there is a satisfactory showing that all test information should be kept confidential as "secret processes", in accordance with Section 403.111, Florida Statutes. Accordingly, all documents or information submitted or disclosed to the Department as confidential related to tests conducted and test results shall be maintained as confidential, pursuant to applicable Florida law.

According to the application, no increase of pollutants above PSD thresholds is anticipated. Therefore, you are hereby authorized to construct the aforementioned slipstream, and conduct performance tests in accordance with the included conditions. All conditions of existing permits related to air pollution emission limits and control equipment remain in force.

The project shall be subject to the following conditions:

1. The permittee shall notify the DEP Northwest District and the Bureau of Air Regulation, in writing, at least seven days prior to beginning construction. Notification shall also occur within seven days, in writing, of completion of construction activities. An "as-built" drawing, including all actual equipment specifications shall also be provided.
2. For the duration of the project, once the permittee has established any test program (or granted a 3rd party the rights to do such test program) a Scope of Work shall be sent by fax to the DEP Northwest District Office as soon as possible and in advance of the planned commencement of the test program. This Scope of Work will give *general* descriptions of processes, work planned, dates of the tests and general objectives of the tests. Proprietary or confidential data, documents or information submitted or disclosed to FDEP shall be identified as such by the Permittee and shall be maintained as such pursuant to applicable Florida law.
3. Beginning June 30, 2006, the permittee shall be responsible for submitting semi-annual summary reports. These reports will outline each test program conducted and outline each test program results. Proprietary or

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confidential data, documents or information submitted or disclosed to FDEP shall be identified as such by the Permittee and shall be maintained as such pursuant to applicable Florida law. The semi-annual summary reports will be sent to the DEP Northwest District Office and the Bureau of Air Regulation. The first summary will be due June 30, 2006 and will cover all tests and the results from such tests conducted between July 1, 2005 and December 31, 2005. In a like manner, a similar summary shall be submitted for each 180 day period thereafter.


4. At the end of each calendar year, the permittee shall include on the Annual Operating Report (AOR) a calculation of Crist Unit 5 emission increases/decreases as a result of the slipstream. Any deviation from the permittee's original estimates (that no PSD Significant Emission Rate thresholds will be crossed) shall be brought to the Department's attention immediately.
5. Stack emissions shall not exceed any limit within existing permits.
6. All stack performance tests shall be conducted using EPA Reference Methods, as contained in 40 CFR 60 (Standards of Performance for New Stationary Sources), 40 CFR 61 (National Emission Standards for Hazardous Air Pollutants), and 40 CFR 266, Appendix IX (Multi-metals), or any other method approved by the Department, in writing, in accordance with Chapter 62-297, F.A.C. [NOTE: this permit condition is only applicable to any stack testing conducted on Crist Unit 5 pursuant to and during the test programs.]
7. Daily records of the slipstream operation (i.e. insertion of and/or removal of equipment from service as well as records of tests performed) shall be maintained on site and available for Department inspection.
8. The project shall not result in the release of objectionable odors pursuant to Rule 62-296.320(2). F.A.C.
9. Performance testing shall cease as soon as possible if the boiler operations are not in accordance with the conditions within existing permits, or this authorization protocol. Performance testing shall not resume until appropriate measures to correct the problem(s) have been implemented.
10. This Department action is only to authorize the MerRC construction and operation. Notification shall occur within 45 days, in writing, upon completion of the final test. Prior to December 31, 2009 the permittee shall provide the DEP Northwest District Office and the Bureau of Air Regulation with its plans to disassemble and remove all slipstream components, returning the unit back to its original condition. Such plans shall be completely executed by April 1, 2010.
11. Unless otherwise specified herein, the preliminary test matrix submitted by the applicant, and received by FDEP via e-mail on February 3, 2005, is acceptable and incorporated herein as Attachment "A".

This letter must be attached to permit No. 0330045-009-AV and shall become a part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit modification) has the right to seek judicial review of it under Section 120.68, F.S., 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 thirty days after this order is filed with the clerk of the Department.

Mr. Gene L. Ussery
March 18, 2005
Page 3

Executed in Tallahassee, Florida.


Michael G. Cooke, Director
Division of Air Resource
Management

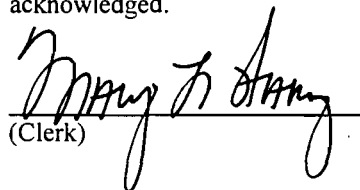
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this permit modification was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 3/25/05 to the person(s) listed:

Gene L. Ussery, Gulf Power *
G. Dwain Waters, Gulf Power
Gregory N. Terry, P.E., Gulf Power
Gregg Worley, EPA
John Bunyak, NPS
Sandra Veazey, NWD

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk) 3/25/05
(Date)

ATTACHMENT "A" – Preliminary Test Matrix

Optimization of process parameters for TOXECON

TOXECON is the EPRI patented technology that captures Hg by injected activated carbon into the flue gas downstream of an existing ESP into a high-ratio fabric filter (baghouse). This approach allows operators to preserve ash sales and minimize the effect of ACL on the existing ESP, while effectively reducing Hg emissions due to long residence times and effective mass transfer between flue gas and AC at the bag surface. To date, several evaluations of TOXECON's performance have funded through the DOE. However, little work to optimize baghouse design and carbon injection control schemes has been undertaken.

This test program will investigate different baghouse sizes (air to cloth ratios) as well as different schemes for activated carbon injection. Typically, Hg in flue gas will be measured along with appropriate process parameters to evaluate an optimum operating condition. Following parametric testing, a long term test will be performed to evaluate balance of plant issues with the chosen optimum.

Effects of selective catalytic reduction (SCR) on Hg chemistry

It is well known that SCR systems can significantly affect Hg chemistry in flue gas, thereby affecting overall system Hg control performance. However, little is understood about the fundamental chemistry that drives this effect, or how this affect changes as SCR catalysts age. These issues will significantly affect how SCR catalyst management programs are implemented in the future.

In order to better understand the chemistry, a program to parametrically investigate different catalyst designs and flue gas conditions will be performed. This program will investigate the affects of NH₃ injection, SCR temperature, space-velocity, catalyst formulation, along with other process parameters to identify optimum design for both NO_x and Hg control.

Effects of flue gas chemistry on Hg control in FGD systems

Because flue gas desulphurization (FGD) systems will be widely used to achieve necessary Hg emission reductions, it is imperative that the mechanisms driving absorption into the scrubber slurry are understood. The effect of scrubber chemistry on Hg control will be investigated in the 1 MW FGD with various configurations of the upstream process equipment (SCR, ESP, and BH).

A test program of this nature is most likely a long term parametric investigation, with mostly shift work due to the nature of the pilot FGD (they are difficult to run for extended periods of time uninterrupted). This is also the most cost effective approach to investigate the multitude of scrubber chemistries that could be encountered.

Optimization of Hg control efficiency for typical units with SCR/ESP/FGD combinations

The utility industry will rely heavily on the co-benefits realized from previously installed NO_x, Particulate, and SO₂ control equipment. The lowest cost overall compliance strategy will require that these combinations of systems be optimized for all Hg control, as well as the other pollutants. Because of the MerRC's unique combination of equipment, it will allow for parametric testing of each system to achieve this goal.

Development of Sulfuric Acid control technologies

As the utility industry begins to install its second fleet of scrubbers, the cost competitiveness of high sulfur coals will begin to improve. The higher sulfur coal will influence the level of sulfuric acid emissions from these facilities, particularly the plants with SCR installations. Currently, there are few demonstrated control technologies that achieve meaningful reductions in acid emissions. Alkaline injection systems are currently the state of the art in sulfuric acid control, but a thorough test program to understand the performance and balance of plant impacts is warranted.

A test program of this nature is likely to be a series of parametric evaluations followed by long term testing to evaluate optimum conditions and any balance of plant problems generated by the technology candidates. For a given alkaline injection technology, a 1 week parametric test program followed by a long term evaluation is probable.

Hg Sorbent development

Activated carbon injection is currently the state of the art in Hg control technology. Once the base injection systems are installed, the choice of sorbent is based on the cost/performance curve of the material in question. For that reason, it is necessary to develop and evaluate the latest developments in sorbent technologies. As these new and improved sorbents come to market, test programs to demonstrate their effectiveness are required.

Any number of test programs in this model could be envisioned and proposed by control equipment vendors and 3rd party researchers. A typical evaluation would consist of 1-2 weeks of parametric testing, followed by a long term evaluation to understand balance of plant impacts. Typical process parameters to be optimized include: injection concentration, Hg control efficiency, ESP/Baghouse performance during injection, and possible implications to ash sales.

Gulf Power Proposed Mercury Research Center (MerRC)

In March 2005, the U.S. EPA is scheduled to promulgate rules that will require utilities to significantly reduce their Hg emissions. Currently, there are no commercially available Hg control technologies with documented long term performance on coal flue gas. Because of the lack of experience, Hg chemistry in flue gas is not very well understood. However, research performed over the past couple of years has shown that pollution control technologies designed to control NO_x, SO₂, and PM can significantly affect overall Hg performance. In order to investigate these relationships, Gulf Power is planning a 5 MW equivalent slip-stream facility equipped with a complete system of flue gas cleanup technologies.

System Description

The proposed slip-stream facility will incorporate a Selective Catalytic Reduction (SCR) system, rotary air-preheater, Electrostatic Precipitator (ESP), baghouse (BH), and wet Flue Gas Desulphurization (wFGD). Each system will be designed with the appropriate level of functionality so that a large number of existing plants can be represented. Because of the complex interactions of Hg with various surfaces in flue gas, it is difficult to generate representative data for full scale installations at the pilot scale. However, the 5 MW scale is sufficiently large enough to provide the appropriate surface to volume ratios to gather representative data. Figure 1 shows a schematic for the proposed system.

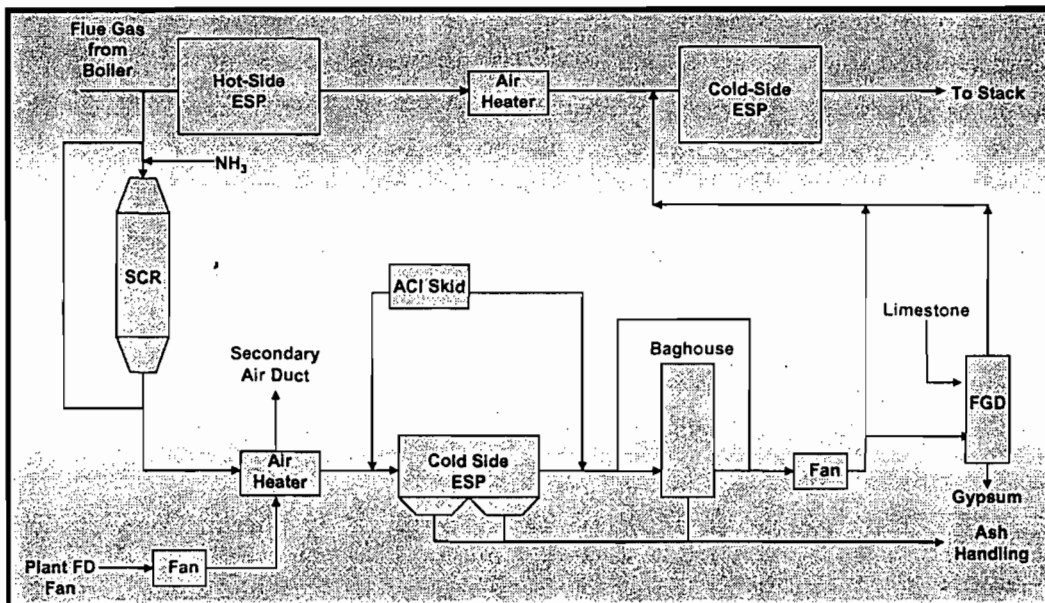


Figure 1: MerRC proposed schematic.

Host Facility

Because of its history with research facilities of this magnitude, Plant Crist Unit 5 was chosen as the host plant for the slip-stream facility. Crist Unit 5 is a wall fired PC boiler

burning low-sulfur bituminous coals and is equipped with hot and cold side ESPs arranged in series. The process gas supplied to the MerRC will be drawn from the inlet of the hot-ESP. The typical flue gas characteristics for this gas stream are presented in Table 1.

Table 1: Typical flue gas characteristics for MerRC inlet.

	Value	Units
Temperature	600	°F
Pressure	-6	inches H ₂ O
N ₂	80	%
CO ₂	15	%
O ₂	3	%
SO ₂	0.6-2.4	lb/mmBtu
NO _x	0.5-0.7	lb/mmBtu
Particulate	7	lb/mmBtu
Hg	6	lb/tBtu
MerRC System Flow	25,000	wacfm

Flue Gas Temperature Control

Because Hg chemistry has been shown to be temperature dependent, temperature control at the inlet of the research facility is crucial. This will be accomplished by using a combination of an economizer bypass line, providing ~ 900°F gas to the facility, or a flue gas heater. The heater will be sized to allow for a wide range of operating temperatures, up to and including 750°F. The heaters will be simple resistance type and will not introduce any additional compounds to the process gas. Typical heater characteristics are presented in Table 2.

Table 2: Flue gas heater parameters.

Heater Type	Electric Resistance heater	
Inlet Temp	600	°F
Max Outlet Temp	750	°F
Heat Input Requirement	3.5	mmBtu/hr
Power Requirement	600	kW

Selective Catalytic Reduction (SCR) system

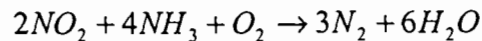
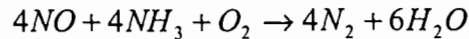
SCR for NO_x control has been widely incorporated throughout the world and is well understood. However, there is little known on the details of Hg chemistry in the SCR. The SCR designed for MerRC will resemble a typical full scale system installed at any number of plants. The scale of MerRC will allow for the use of full scale catalyst modules, with the cross section designed to achieve representative space velocities for the system. Typical SCR design points are shown in Table 3. The SCR will be equipped with 3 catalyst layers, which will allow for greater than 80% control of NO_x and a maximum pressure drop of 6 in. H₂O.

Table 3: Typical SCR system design points.

SCR System Inlet NO _x	0.7 lb/mmBtu
Expected SCR Performance	90%
Typical SCR Outlet	0.07 lb/mmBtu
Number of Catalyst Layers	3
Typical Maximum NH ₃ slip	5 ppm _{vd} @ 3% O ₂

The research facility will also incorporate a SCR reactor by-pass to allow for testing of alternate designs. Although research has shown that SCRs do not control Hg, data has shown it can significantly affect the chemistry of downstream devices, which could significantly change the performance of those systems. The ability to operate with and without SCR in service is a necessary requirement in order to investigate seasonal operation as well as alternate plant configurations.

In order to achieve NO_x reductions within the SCR, ammonia must be fed as a reagent to react with NO and NO₂ per the following equations.



Typically 95% of NO_x in the flue gas stream is NO, with the remainder NO₂. At these ratios, an ammonia flow rate of ~25 lb/hr to the SCR can be expected in order to achieve the stated NO_x reduction goals. At these rates, an ammonia slip of less than 5 ppm (0.065 lb/hr) is expected. However, during some research programs, this value could be exceeded for short periods of time.

Air Pre-heater (APH)

In order to mimic the time-temperature profile of a full scale system, the MerRC will incorporate a rotary type APH for flue gas cooling. The APH will cool the flue gas from ~700°F to 300°F before sending it to the downstream air pollution control equipment. In order to reject the heat transferred from the flue gas, a cooling air fan will be installed. The cooling air fan will provide ambient air supplied from the plant forced draft fan to the APH and, after heating, will force the air back into the plant secondary air duct in order to minimize the efficiency impacts of the MerRC. Table 5 presents pertinent APH design information.

Table 5: APH typical design criteria.

APH Type	Rotary (Lungstrom)
Heat load	5.5 mmBtu/hr
Flue Gas inlet Temp	700 °F
Air inlet Temp	72 °F
Flue Gas outlet	300 °F
Air Outlet	550 °F

Electrostatic Precipitator (ESP)

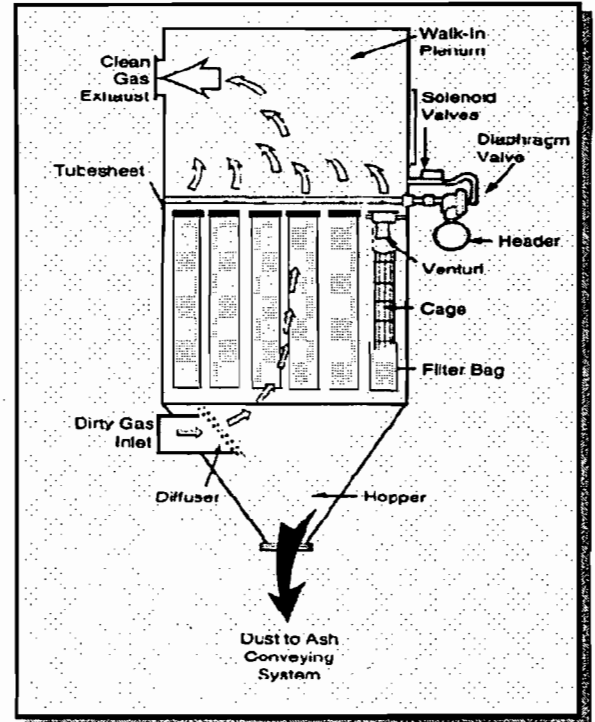
The utility industry has operated ESPs for several decades. However, in the future, more stringent particulate emission requirements will force operators to make incremental improvements in performance. Additionally, the co-benefit of Hg removal in these ESPs could play a significant role in achieving least cost compliance. The ESP installed in the MerRC will be designed as a single casing 4 field unit, able to achieve >99% removal efficiency of particulate matter. Typical design data are listed in Table 6.

Table 6: Typical ESP design data.

Number of fields	4
Field Length	5 ft
Field Height	12 ft
SCA (ft ² /1000acfm)	225
Efficiency	>99%

Baghouse

Currently, the most mature Hg control technology is TOXECON™. TOXECON™ is an EPRI patented technology that incorporates a high (air to cloth) ratio fabric filter downstream of an ESP, with activated carbon injection (ACI) between. The high ratio baghouse, or COHPAC baghouse, is designed to minimize conserve footprint while weighing increased pressure drop due to higher bag face velocities. There are only a handful of installations of this technology in the industry, and 2 of them are located at Alabama Power's Plant Gaston near Birmingham, AL. Southern Company has significantly contributed to the development, and would be able to continue this development at the MerRC. The baghouse will be designed to allow for multiple bag configurations, bag types, and inlet loadings so that critical parameters for long term performance of these systems can be investigated. Figure 2 shows a schematic for a typical COHPAC baghouse.



Activated Carbon Injection (ACI)

As stated above, the most mature Hg control technology is TOXECON (ACI into COHPAC baghouse). Significant work has been performed by Southern Company and others to investigate ACI into existing ESPs. Although results from these programs show promising Hg control results, there is concern that the additional solids loading to the ESP will degrade the particulate removal performance. In order to understand long term performance and BOP issues of both of these control concepts, the MerRC will

incorporate a carbon injection skid. The skid will be designed with enough variability to allow for both injection schemes. Typical injection rates for ACI into ESPs vary from 5-20 lbs Carbon/mmacf (5-20 lbs/hr) of flue gas, and for TOXECON from 0.5-2 lbs/mmacf (0.5-2 lbs/hr). As the art of ACI matures over time, the MerRC will also provide a testing ground for the latest innovation in sorbents. Assuming an annual capacity factor of 10% for ESP injection, you could expect ~7.5 tons of activated carbon, and ~0.5 tons of activated carbon for the TOXECON injection case.

Wet Flue-gas Desulphurization

Over the next decade, Southern Company will be installing a large number of FGD systems throughout its fleet, including some of Gulf Power's units. In order to achieve the lowest cost Hg compliance, it will be paramount that these systems be optimized for Hg removal efficiency. Tests have shown that wet FGD systems can efficiently capture oxidized Hg. However, little about Hg chemistry in the FGD is understood. Research to uncover the critical factors affecting these chemical processes is needed.

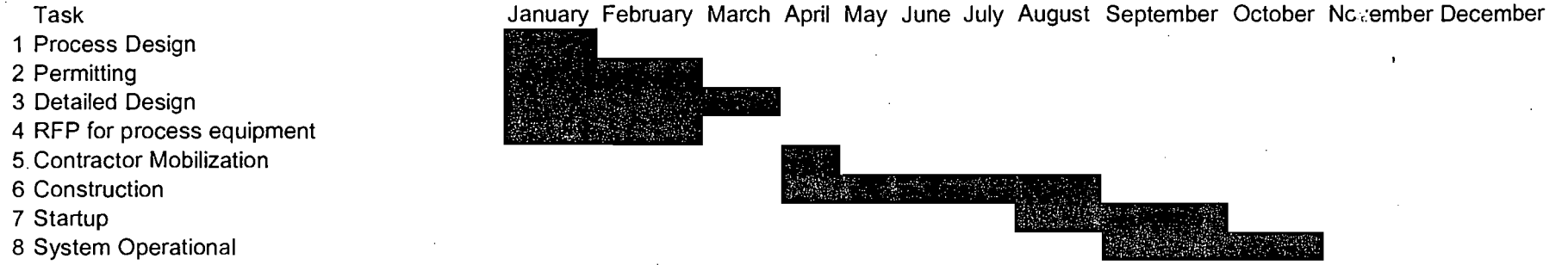
Southern Company currently owns a 1 MW scale pilot wet FGD system. This system will be incorporated into the MerRC to study the effects described above. The FGD will require a limestone feed for SO₂ control, and will produce a gypsum byproduct. Typical process flows are presented in Table 7. Applying an annual capacity factor of 20% to the FGD projects an annual gypsum production of ~45 tons.

Table 7: Typical stream flows for FGD pilot.

System Flow	3000 acfm @ 300°F
SO ₂ Concentration	1100 ppm _v
SO ₂ Feed (lb/hr)	24
Limestone Feed (lb/hr)	37.5
Gypsum Draw off (lb/hr)	51

Crist Mercury Research Center

2005



SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <i>x [Signature]</i> <div style="float: right;"> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee </div>
1. Article Addressed to: <div style="border: 1px solid black; padding: 5px;"> Mr. Gene L. Ussery V.P. Power Generation Gulf Power Company One Energy Place Pensacola, Florida 32520-0110 </div>	B. Received by (<i>Printed Name</i>) C. Date of Delivery
2. Article Number <i>(Transfer from service label)</i> 7001 0320 0001 3692 2206	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
PS Form 3811, August 2001	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
Domestic Return Receipt	4. Restricted Delivery? (<i>Extra Fee</i>) <input type="checkbox"/> Yes
102595-02-M-1540	

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 2206

Postage	\$	Postmark Here
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Return Receipt Fee <small>(Endorsement Required)</small>		
Restricted Delivery Fee <small>(Endorsement Required)</small>		

To

Sen Street or P.O. Box City	Mr. Gene L. Ussery V.P. Power Generation Gulf Power Company One Energy Place Pensacola, Florida 32520-0110
-----------------------------------	--

PS Form 3800, January 2001 See Reverse for Instructions

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

MAR 15 2005

BUREAU OF AIR REGULATION
Certified Mail



March 11, 2005

Mr. Mike Halpin, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Halpin:

RE: CRIST ELECTRIC GENERATION FACILITY
DEP File No. 0330045-011-AC
Air Construction Permit for Mercury Research Center- Public Notice Affidavit

Thanks for the quick response to Gulf Power's request for an air construction permit to build and operate a mercury research center at Plant Crist. Enclosed is the proof of publication, i.e., newspaper affidavit regarding the Public Notice of Intent to Issue An Air Construction Permit originally sent to Gene L. Ussery (Gulf Power) on February 24, 2005. The notice was published on March 3, 2005 in the Pensacola News Journal.

Please let me know if you have any questions regarding this matter and if you receive any public comments regarding our request.

Sincerely,

A handwritten signature in black ink that reads "Dwain Waters, Q.E.P." The signature is written in a cursive style.

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

Cc: Jim Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Sandra Veazey, FDEP, Northwest District

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERM
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0330045-011-AC

Gulf Power Company
Crist Electrical Generating Plant
Escambia County

Published Daily-Pensacola, Escambia County, FL.

STATE OF FLORIDA

County of Escambia

Before the undersigned authority personally appeared

KAY CHASTAIN who is personally known to me and

who on oath says that he/she is a representative of The

Pensacola News Journal, a daily newspaper published in

Pensacola in Escambia County, Florida; that the attached

copy of advertisement, being a legal in the matter of

PUBLIC NOTICE was published in said newspaper in

the issues of **MARCH 3, 2005**. Affidavit further says that

the said Pensacola News Journal is a newspaper published

in Pensacola, in said Escambia County, Florida, and that

the said newspaper has heretofore been continuously

published in said Escambia County, Florida each day and

has been entered as second class mail matter at the post

office in Pensacola, in said Escambia County, Florida, for

a period of one year next preceding the first publication of

the attached copy of advertisement; and Affidavit further

says that he/she has neither paid nor promised any person,

firm, or corporation any discount, rebate, commission or

refund for the purpose of securing this advertisement for

publication in the said newspaper.

Sworn to and subscribed before me this **7TH DAY OF**

MARCH, A.D., 2005.



Notary

Public

NIKKI G. WINDHAM
Notary Public-State of FL
Comm. Exp. Aug. 1, 2008
Comm. No. DD 342647

The Department of Environmental Protection (Department) gives n its intent to issue an Air Construction Permit for Crist Electrical Generating P cated on Pate Road, off 10 Mile Road, on Governors Bayou, Pensacola, Es County. The permit is to allow the construction and operation of a temporar equivalent slip-stream facility equipped with a complete system of flue gas technologies at Crist Unit 5. The proposed slip-stream facility will incorporate: lective Catalytic Reduction (SCR) system, a rotary air-heater, an electrostatic ator (ESP), a baghouse (BH), and a wet flue gas desulfurization (FGD) s. According to the applicant, no increase of pollutants above PSD thresholds i pated. As such, a Determination of Best Available Control Technology (BA not required, since there will be no significant increases in criteria pollutants fined by Table 62-212.400-2 of the Florida Administrative Code. Based up mation provided by the applicant and pursuant to the applicant's request, partment has determined that there is a satisfactory showing that all test: i tion should be kept confidential as "secret processes", in accordance with 403.111, Florida Statutes. Accordingly, all documents or information submitte closed as confidential to the Department related to tests conducted and tes shall be maintained as confidential, pursuant to applicable Florida law. TR cant's mailing address is: One Energy Place, Pensacola FL 32520-0110.

An air quality impact analysis was not required. The Department v the Final Permit with the attached conditions unless a response received in ance with the following procedures results in a different decision or si change of terms or conditions.

The Department will accept written comments concerning the p permit issuance action for a period of 14 (fourteen) days from the date of tion of this Public Notice of Intent to Issue Air Construction Permit. Writts ments should be provided to the Department's Bureau of Air Regulation, Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any comments filed shall be made available for public inspection. If written cc received result in a significant change in the proposed agency action, the ment shall revise the proposed permit and require, if applicable, another Notice.

The Department will issue the permit with the attached conditions timely petition for an administrative hearing is filed pursuant to sections 120 120.57 F.S., before the deadline for filing a petition. The procedures for p for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposee ting decision may petition for an administrative proceeding (hearing) under 120.569 and 120.57 of the Florida Statutes. The petition must contain the tion set forth below and must be filed (received) in the Office of General C the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tall Florida, 32399-3000. Petitions filed by the permit applicant or any of the pe ed below must be filed within fourteen days of receipt of this notice of inte tions filed by any persons other than those entitled to written notice unde 120.60(3) of the Florida Statutes must be filed within fourteen days of publi the public notice or within fourteen days of receipt of this notice of intent, v occurs first. Under section 120.60(3), however, any person who asked the ment for notice of agency action may file a petition within fourteen days of t that notice, regardless of the date of publication. A petitioner shall mail e the petition to the applicant at the address indicated above at the time of fi failure of any person to file a petition within the appropriate time period sh tute a waiver of that person's right to request an administrative determinati ing) under sections 120.569 and 120.57 F.S., or to intervene in this proce participate as a party to it. Any subsequent intervention will be only at the of the presiding officer upon the filing of a motion in compliance with 106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Departmen is based must contain the following information: (a) The name and address agency affected and each agency's file or identification number, if known; name, address, and telephone number of the petitioner, the name, address, ephone number of the petitioner's representative, if any, which shall be the for service purposes during the course of the proceeding; and an expl how the petitioner's substantial interests will be affected by the agency d tion; (c) A statement of how and when petitioner received notice of the a tion or proposed action; (d) A statement of all disputed issues of materi there are none, the petition must so indicate; (e) A concise statement c mate facts alleged, including the specific facts the petitioner contends warr sal or modification of the agency's proposed action; (f) A statement of th rules or statutes the petitioner contends require reversal or modification of cy's proposed action; and (g) A statement of the relief sought by the i stating precisely the action petitioner wishes the agency to take with resp agency's proposed action.

A petition that does not dispute the material facts upon which th ment's action is based shall state that no such facts are in dispute and shall contain the same information as set forth above, as required by 106.301.

Because the administrative hearing process is designed to forrr agency action, the filing of a petition means that the Department's final a be different from the position taken by it in this notice. Persons whose sub terests will be affected by any such final decision of the Department on th tion have the right to petition to become a party to the proceeding, in ac with the requirements set forth above.

A complete project file is available for public inspection during no ness hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except lega at:

Florida Department of
Environmental Protection
Bureau of Air Regulation

Florida Department of
Environmental Protection
Northwest District Office

**PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

DEP File No. 0330045-011-AC

Gulf Power Company
Crist Electrical Generating Plant
Escambia County

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit for Crist Electrical Generating Plant, located on Pate Road, off 10 Mile Road, on Governors Bayou, Pensacola, Escambia County. The permit is to allow the construction and operation of a temporary 6 MW equivalent slip-stream facility equipped with a complete system of flue gas cleanup technologies at Crist Unit 5. The proposed slip-stream facility will incorporate a Selective Catalytic Reduction (SCR) system, a rotary air heater, an electrostatic precipitator (ESP), a baghouse (BH), and a wet flue gas desulfurization (FGD) system. According to the applicant, no increase of pollutants above PSD thresholds is anticipated. As such, a Determination of Best Available Control Technology (BACT) was not required since there will be no significant increases in criteria pollutants as defined by Table 62-212.400(2) of the Florida Administrative Code. Based upon information provided by the applicant and pursuant to the applicant's request, the Department has determined that there is a satisfactory showing that all test information should be kept confidential as "secret processes" in accordance with Section 403.111, Florida Statutes. Accordingly, all documents or information submitted or disclosed as confidential to the Department related to tests conducted and test results shall be maintained as confidential pursuant to applicable Florida law. The applicant's mailing address is: One Energy Place, Pensacola, FL 32520-0110.

An air quality impact analysis was not required. The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

BEST AVAILABLE COPY

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 how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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.

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

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

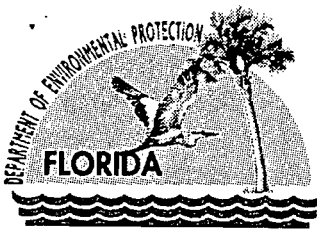
Florida Department of
Environmental Protection

Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: (850) 488-1344
Fax: (850) 922-6979

Florida Department of
Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32502-5794
Telephone: (850) 595-8300
Fax: (850) 595-4417

The complete project file includes the application, Draft permit, and the information submitted by the Responsible Official, exclusive of confidential records under Section 403.111, F.S. Interested persons may review specific details of this project by contacting the Administrator, North Permitting Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

Legal No. 67552 1T March 3, 2005



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

February 24, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gene L. Ussery
V.P. Power Generation
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0110

Re: Crist Mercury Research Center (MerRC)
Project ID No. 0330045-011-AC

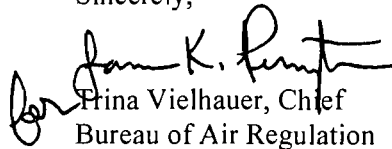
Dear Mr. Ussery:

Enclosed is one copy of the Draft Air Construction Permit relative to the request from Gulf Power Company to construct and operate a temporary research center for evaluating mercury (Hg) emission reduction techniques on Crist Unit 5. The subject facility is located in Pensacola, Escambia County.

The Public Notice of Intent to Issue Air Construction Permit must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to James K. Pennington, P.E., Administrator, North Permitting Section at the above letterhead address. If you have any other questions, please contact Michael P. Halpin, P.E. at 850/921-9519.

Sincerely,


Trina Vielhauer, Chief
Bureau of Air Regulation

TV/mph
Enclosures

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permit by:

Mr. Gene L. Ussery, V.P. Power Generation
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0110

DEP File No. 0330045-011-AC

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit (copy of Draft permit attached) for the proposed project, detailed in the application specified above and for the reasons stated below.

The applicant, Gene Ussery, Vice President of Power Generation – Gulf Power Company, applied on January 25, 2005, to the Department for an Air Construction Permit at its Crist Electric Generating Plant, located on Pate Road, off 10 Mile Road (on Governors Bayou) in Pensacola, Escambia County. The request is to construct and operate a temporary 5 MW equivalent slip-stream facility equipped with a complete system of flue gas cleanup technologies at Crist Unit 5. The proposed slip-stream facility will incorporate a Selective Catalytic Reduction (SCR) system, a rotary air-heater, an electrostatic precipitator (ESP), a baghouse (BH), and a wet flue gas desulphurization (FGD) system. According to the application, no increase of pollutants above PSD thresholds is anticipated. Based upon information provided by the applicant and pursuant to the applicant's request, the Department has determined that there is a satisfactory showing that all test information should be kept confidential as "secret processes", in accordance with Section 403.111, Florida Statutes. Accordingly, all documents or information submitted or disclosed as confidential to the Department related to tests conducted and test results shall be maintained as confidential, pursuant to applicable Florida law.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-212 and 40 CFR 52.21. The above actions are not exempt from permitting procedures. The Department has determined that an Air Construction Permit is required relative to temporary installations such as the one described herein.

The Department intends to issue this Air Construction Permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. and 40 CFR 52.21.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting 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 Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station

#5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department'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 how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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.

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

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address,

and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.


Trina Vielhauer, Chief
Bureau of Air Regulation

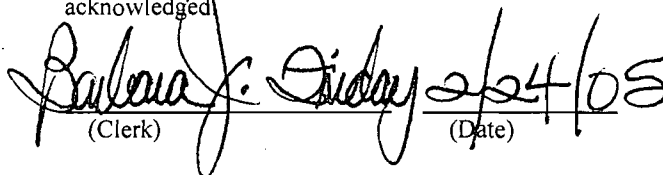
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice of Intent to Issue Air Construction Permit and the Draft Air Construction Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 2/24/05 to the person(s) listed:

Gene L. Ussery, Gulf Power *
G. Dwain Waters, Gulf Power
Gregory N. Terry, P.E., Gulf Power
Gregg Worley, EPA
John Bunyak, NPS
Sandra Veazey, NWD

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk) 2/24/05 (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0330045-011-AC

Gulf Power Company
Crist Electrical Generating Plant
Escambia County

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit for Crist Electrical Generating Plant, located on Pate Road, off 10 Mile Road, on Governors Bayou, Pensacola, Escambia County. The permit is to allow the construction and operation of a temporary 5 MW equivalent slip-stream facility equipped with a complete system of flue gas cleanup technologies at Crist Unit 5. The proposed slip-stream facility will incorporate a Selective Catalytic Reduction (SCR) system, a rotary air-heater, an electrostatic precipitator (ESP), a baghouse (BH), and a wet flue gas desulphurization (FGD) system. According to the applicant, no increase of pollutants above PSD thresholds is anticipated. As such, a Determination of Best Available Control Technology (BACT) was not required, since there will be no significant increases in criteria pollutants as defined by Table 62-212.400-2 of the Florida Administrative Code. Based upon information provided by the applicant and pursuant to the applicant's request, the Department has determined that there is a satisfactory showing that all test information should be kept confidential as "secret processes", in accordance with Section 403.111, Florida Statutes. Accordingly, all documents or information submitted or disclosed as confidential to the Department related to tests conducted and test results shall be maintained as confidential, pursuant to applicable Florida law. The applicant's mailing address is: One Energy Place, Pensacola FL 32520-0110.

An air quality impact analysis was not required. The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

February 24, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gene L. Ussery
V.P. Power Generation
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0110

File No. 0330045-011-AC
SIC No. 4911
Expires: April 1, 2010

Re: Crist Mercury Research Center (MerRC)

Dear Mr. Ussery:

The Department has reviewed the request from Gulf Power received on January 25, 2005 concerning the construction of a temporary research center for evaluating mercury (Hg) emission reduction techniques. As indicated in the application, research has shown that pollution control technologies designed to control NO_x, SO₂, and PM can affect overall Hg performance. In order to investigate these relationships, Gulf Power is planning a 5 MW equivalent slip-stream facility equipped with a complete system of flue gas cleanup technologies at Crist Unit 5, located in Escambia County, Florida. The proposed slip-stream facility will incorporate a Selective Catalytic Reduction (SCR) system, a rotary air-heater, an electrostatic precipitator (ESP), a baghouse (BH), and a wet flue gas desulphurization (FGD) system. Based upon information provided by the applicant and pursuant to the applicant's request, the Department has determined that there is a satisfactory showing that all test information should be kept confidential as "secret processes", in accordance with Section 403.111, Florida Statutes. Accordingly, all documents or information submitted or disclosed to the Department as confidential related to tests conducted and test results shall be maintained as confidential, pursuant to applicable Florida law.

According to the application, no increase of pollutants above PSD thresholds is anticipated. Therefore, you are hereby authorized to construct the aforementioned slipstream, and conduct performance tests in accordance with the included conditions. All conditions of existing permits related to air pollution emission limits and control equipment remain in force.

The project shall be subject to the following conditions:

1. The permittee shall notify the DEP Northwest District and the Bureau of Air Regulation, in writing, at least seven days prior to beginning construction. Notification shall also occur within seven days, in writing, of completion of construction activities. An "as-built" drawing, including all actual equipment specifications shall also be provided.
2. For the duration of the project, once the permittee has established any test program (or granted a 3rd party the rights to do such test program) a Scope of Work shall be sent by fax to the DEP Northwest District Office as soon as possible and in advance of the planned commencement of the test program. This Scope of Work will give *general* descriptions of processes, work planned, dates of the tests and general objectives of the tests.

Proprietary or confidential data, documents or information submitted or disclosed to FDEP shall be identified as such by the Permittee and shall be maintained as such pursuant to applicable Florida law.

3. Beginning June 30, 2006, the permittee shall be responsible for submitting semi-annual summary reports. These reports will outline each test program conducted and outline each test program results. Proprietary or confidential data, documents or information submitted or disclosed to FDEP shall be identified as such by the Permittee and shall be maintained as such pursuant to applicable Florida law. The semi-annual summary reports will be sent to the DEP Northwest District Office and the Bureau of Air Regulation. The first summary will be due June 30, 2006 and will cover all tests and the results from such tests conducted between July 1, 2005 and December 31, 2005. In a like manner, a similar summary shall be submitted for each 180 day period thereafter.
4. At the end of each calendar year, the permittee shall include on the Annual Operating Report (AOR) a calculation of Crist Unit 5 emission increases/decreases as a result of the slipstream. Any deviation from the permittee's original estimates (that no PSD Significant Emission Rate thresholds will be crossed) shall be brought to the Department's attention immediately.
5. Stack emissions shall not exceed any limit within existing permits.
6. All stack performance tests shall be conducted using EPA Reference Methods, as contained in 40 CFR 60 (Standards of Performance for New Stationary Sources), 40 CFR 61 (National Emission Standards for Hazardous Air Pollutants), and 40 CFR 266, Appendix IX (Multi-metals), or any other method approved by the Department, in writing, in accordance with Chapter 62-297, F.A.C. [NOTE: this permit condition is only applicable to any stack testing conducted on Crist Unit 5 pursuant to and during the test programs.]
7. Daily records of the slipstream operation (i.e. insertion of and/or removal of equipment from service as well as records of tests performed) shall be maintained on site and available for Department inspection.
8. The project shall not result in the release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C.
9. Performance testing shall cease as soon as possible if the boiler operations are not in accordance with the conditions within existing permits, or this authorization protocol. Performance testing shall not resume until appropriate measures to correct the problem(s) have been implemented.
10. This Department action is only to authorize the MerRC construction and operation. Notification shall occur within 45 days, in writing, upon completion of the final test. Prior to December 31, 2009 the permittee shall provide the DEP Northwest District Office and the Bureau of Air Regulation with its plans to disassemble and remove all slipstream components, returning the unit back to its original condition. Such plans shall be completely executed by April 1, 2010.
11. Unless otherwise specified herein, the preliminary test matrix submitted by the applicant, and received by FDEP via e-mail on February 3, 2005, is acceptable and incorporated herein as Attachment "A".

This letter must be attached to permit No. 0440045-009-AV and shall become a part of the permit.

Sincerely,

Michael G. Cooke, Director
Division of Air Resource
Management

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer

THRU: ~~J. K. Pennington~~

FROM: M. P. Halpin *MH*

DATE: February 11, 2005

SUBJECT: Gulf Power Company
Crist Unit 5 Mercury Research Center (MerRC)
DEP File No. 0330045-011-AC

Attached is the public notice package for the Crist Electric Generating Plant Mercury Research Center to be located at Crist Unit 5. This is an existing coal-fired facility located in Pensacola, Escambia County.

As indicated in the application, research has shown that pollution control technologies designed to control NO_x, SO₂, and PM can affect overall Hg performance. In order to investigate these relationships, Gulf Power is planning a 5 MW equivalent slip-stream facility equipped with a complete system of flue gas cleanup technologies at Crist Unit 5, located in Escambia County, Florida. The proposed slip-stream facility will incorporate a Selective Catalytic Reduction (SCR) system, a rotary air-heater, an electrostatic precipitator (ESP), a baghouse (BH), and a wet flue gas desulphurization (FGD) system.

The applicant anticipates that the facility will be in operation for up to five years. According to the application, no increase of pollutants above PSD thresholds is anticipated. Given that this is a "research" facility, I have allowed a fair amount of flexibility for the permittee, requiring only advance notice of testing and disclosure of test results.

I recommend your approval.

JKP/mph

Attachments



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

February 11, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gene L. Ussery
V.P. Power Generation
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0110


Re: Crist Mercury Research Center (MerRC)
TDF Test Burn
AIRS ID No. 0330045-011-AC

Dear Mr. Ussery:

Enclosed is one copy of the Draft Air Construction Permit relative to the request from Gulf Power Company to construct and operate a temporary research center for evaluating mercury (Hg) emission reduction techniques on Crist Unit 5. The subject facility is located in Pensacola, Escambia County.

The Public Notice of Intent to Issue Air Construction Permit must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to J. K. Pennington, P.E., Administrator, North Permitting Section at the above letterhead address. If you have any other questions, please contact Michael P. Halpin, P.E. at 850/921-9519.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

TV/mph
Enclosures

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permit by:

Mr. Gene L. Ussery, V.P. Power Generation
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0110

DEP File No. 0330045-011-AC

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit (copy of Draft permit attached) for the proposed project, detailed in the application specified above and for the reasons stated below.

The applicant, Gene Ussery, Vice President of Power Generation – Gulf Power Company, applied on January 25, 2005, to the Department for an Air Construction Permit at its Crist Electric Generating Plant, located on Pate Road, off 10 Mile Road (on Governors Bayou) in Pensacola, Escambia County. The request is to construct and operate a temporary 5 MW equivalent slip-stream facility equipped with a complete system of flue gas cleanup technologies at Crist Unit 5. The proposed slip-stream facility will incorporate a Selective Catalytic Reduction (SCR) system, a rotary air-heater, an electrostatic precipitator (ESP); a baghouse (BH), and a wet flue gas desulphurization (FGD) system. According to the application, no increase of pollutants above PSD thresholds is anticipated.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-212 and 40 CFR 52.21. The above actions are not exempt from permitting procedures. The Department has determined that an Air Construction Permit is required relative to temporary installations such as the one described herein.

The Department intends to issue this Air Construction Permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. and 40 CFR 52.21.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting 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 Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department'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 how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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.

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

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

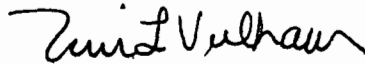
The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented

by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

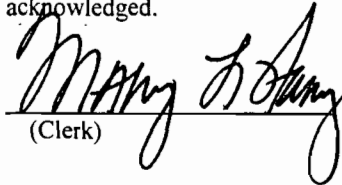
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice of Intent to Issue Air Construction Permit and the Draft Air Construction Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 2/14/05 to the person(s) listed:

Gene L. Ussery, Gulf Power *
G. Dwain Waters, Gulf Power
Gregory N. Terry, P.E., Gulf Power
Gregg Worley, EPA
John Bunyak, NPS
Sandra Veazey, NWD

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk) 2/14/05
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0330045-011-AC

Gulf Power Company
Crist Electrical Generating Plant
Escambia County

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit for Crist Electrical Generating Plant, located on Pate Road, off 10 Mile Road, on Governors Bayou, Pensacola, Escambia County. The permit is to allow the construction and operation of a temporary 5 MW equivalent slip-stream facility equipped with a complete system of flue gas cleanup technologies at Crist Unit 5. The proposed slip-stream facility will incorporate a Selective Catalytic Reduction (SCR) system, a rotary air-heater, an electrostatic precipitator (ESP), a baghouse (BH), and a wet flue gas desulphurization (FGD) system. According to the applicant, no increase of pollutants above PSD thresholds is anticipated. As such, a Determination of Best Available Control Technology (BACT) was not required, since there will be no significant increases in criteria pollutants as defined by Table 62-212.400-2 of the Florida Administrative Code. The applicant's mailing address is: One Energy Place, Pensacola FL 32520-0110.

An air quality impact analysis was not required. The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department'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

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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

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

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Florida Department of
Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: (850) 488-1344
Fax: (850) 922-6979

Florida Department of
Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32502-5794
Telephone: (850) 595-8300
Fax: (850) 595-4417

The complete project file includes the application, Draft permit, and the information submitted by the Responsible Official, exclusive of confidential records under Section 403.111, F.S. Interested persons may review specific details of this project by contacting the Administrator, North Permitting Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER



February 11, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gene L. Ussery
V.P. Power Generation
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0110

File No. 0330045-011-AC
SIC No. 4911
Expires: April 1, 2010

Re: Crist Mercury Research Center (MerRC)

Dear Mr. Ussery:

The Department has reviewed the request from Gulf Power received on January 25, 2005 concerning the construction of a temporary research center for evaluating mercury (Hg) emission reduction techniques. As indicated in the application, research has shown that pollution control technologies designed to control NO_x, SO₂, and PM can affect overall Hg performance. In order to investigate these relationships, Gulf Power is planning a 5 MW equivalent slip-stream facility equipped with a complete system of flue gas cleanup technologies at Crist Unit 5, located in Escambia County, Florida. The proposed slip-stream facility will incorporate a Selective Catalytic Reduction (SCR) system, a rotary air-heater, an electrostatic precipitator (ESP), a baghouse (BH), and a wet flue gas desulphurization (FGD) system. According to the application, no increase of pollutants above PSD thresholds is anticipated.

You are hereby authorized to construct the aforementioned slipstream, and conduct performance tests in accordance with the included conditions. All conditions of existing permits related to air pollution emission limits and control equipment remain in force.

The project shall be subject to the following conditions:

1. The permittee shall notify the DEP Northwest District and the Bureau of Air Regulation, in writing, at least seven days prior to beginning construction. Notification shall also occur within seven days, in writing, of completion of construction activities. Within this notification, shall be included specific details of the first 120 days of planned testing (exclusive of equipment start-up and shake-down testing) which the applicant proposes to conduct. An "as-built" drawing, including all actual equipment specifications shall also be provided.
2. For the duration of the project, the permittee shall notify the DEP Northwest District at least 7 days prior to commencing any emission testing, such that the Department may witness such tests. A weekly summary of daily emission testing activities (for the upcoming week), sent by fax to the DEP Northwest District Office shall suffice for this notification.
3. At the end of each 90 day period (quarterly), the permittee shall submit to the DEP Northwest District Office and the Bureau of Air Regulation a written summary of all test results during the prior 90 day period, as well as specific details of the next 90 days of planned testing.

DRAFT

Best Available Copy

Mr. Gene L. Ussery
February 11, 2005
Page 2

4. At the end of each calendar year, the permittee shall include on the Annual Operating Report (AOR) a calculation of Crist Unit 5 emission increases/decreases as a result of the slipstream. Any deviation from the permittee's original estimates (that no PSD Significant Emission Rate thresholds will be crossed) shall be brought to the Department's attention immediately.
5. Stack emissions shall not exceed any limit within existing permits.
6. Performance tests shall be conducted using EPA Reference Methods, as contained in 40 CFR 60 (Standards of Performance for New Stationary Sources), 40 CFR 61 (National Emission Standards for Hazardous Air Pollutants), and 40 CFR 266, Appendix IX (Multi-metals), or any other method approved by the Department, in writing, in accordance with Chapter 62-297, F.A.C.
7. Daily records of the slipstream operation (i.e. insertion of and/or removal of equipment from service as well as records of tests performed) shall be maintained on site and available for Department inspection.
8. The project shall not result in the release of objectionable odors pursuant to Rule 62-296.320(2). F.A.C.
9. Performance testing shall cease as soon as possible if the boiler operations are not in accordance with the conditions within existing permits, or this authorization protocol. Performance testing shall not resume until appropriate measures to correct the problem(s) have been implemented.
10. This Department action is only to authorize the MerRC construction and operation. Notification shall occur within 5 days, in writing, upon completion of the final test. Prior to December 31, 2009 the permittee shall provide the DEP Northwest District Office and the Bureau of Air Regulation with its plans to disassemble and remove all slipstream components, returning the unit back to its original condition. Such plans shall be completely executed by April 1, 2010.
11. Unless otherwise specified herein, the preliminary test matrix submitted by the applicant, and received by FDEP via e-mail on February 3, 2005, is acceptable and incorporated herein as Attachment "A".

This letter must be attached to permit No. 0440045-009-AV and shall become a part of the permit.

Sincerely,

Michael G. Cooke, Director
Division of Air Resource
Management

TV/mh

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature X <i>L. Jones</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to: Mr. Gene L. Ussery V.P. Power Generation Gulf Power Company One Energy Place Pensacola, Florida 32520-0110	B. Received by (Printed Name) <i>L. Jones</i>	C. Date of Delivery <i>2-25-05</i>
2. Article Number (Transfer from service label)	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
7000 2870 0000 7027 9959		
PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540		

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)		
Mr. Gene L. Ussery, V.P. of Power Generation		
Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	
Sent To Mr. Gene L. Ussery, V.P. of Power Generation		
Street, Apt. No.; or PO Box No. One Energy Place		
City, State, ZIP+4 Pensacola, Florida 32520-0110		
PS Form 3800, May 2000 See Reverse for Instructions		

7000 2870 0000 7027 9959

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Gene L. Ussery
 V.P. Power Generation
 Gulf Power Company
 One Energy Place
 Pensacola, Florida 32520-0110

2. Article Number
 (Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
James Blakely

B. Received by (Printed Name) C. Date of Delivery
JAMES BLAKELY 2-15-05

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

PS Form 3811, August 2000 102595-02-M-1540

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)**

9092 DTTE ET00 0271 0007

[Redacted]

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

Postmark
 Here

1
 Se Mr. Gene L. Ussery
 V.P. Power Generation
 Si Gulf Power Company
 Ci One Energy Place
 Pensacola, Florida 32520-0110

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

MAY 31 2005

BUREAU OF AIR REGULATION

Certified Mail



May 27, 2005

Jonathan Holtom
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Holtom:

RE: CRIST ELECTRIC GENERATING PLANT
ADDITIONAL INFORMATION REQUEST
SNCR CONSTRUCTION PERMIT APPLICATION
Permit No: 0330045-012-AC

Please find enclosed Gulf Power's response to your February 24, 2005 request for additional information regarding the installation of the SNCR to Unit 6 at the Crist Electric Generating Plant located in Pensacola, Florida. Included in the response is the required certification by a Professional Engineer registered in Florida.

As you may be aware, Gulf Power's schedule to begin construction of this project is critical to meeting the May 1, 2006 FDEP-Gulf Ozone Agreement and thus activity will begin in September, 2005. Please advise Gulf Power as soon as possible any potential delay to the construction schedule due to permitting processes.

We appreciate your efforts to work with us regarding the startup of this emission control system. Please call me regarding any additional 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.
Air Quality Programs Supervisor

cc: w/att: Trina Vielhauer, FDEP – Tallahassee Office
Jim Vick, Gulf Power Company
Wright, Terry, Gulf Power Company
John Dominey, Gulf Power Company
David Hollinger, Southern Company
Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida
Mr. Richard Fancher, FDEP Northwest District Office, Pensacola, Florida

CRIST UNIT 6

**FDEP – SNCR REQUEST FOR ADDITIONAL INFORMATION
CERTIFICATION BY PROFESSIONAL ENGINEER**

“I, the undersigned, am a registered professional engineer in the State of Florida and hereby certify to the best of my knowledge that all information being submitted pursuant to FDEP’s request for additional information regarding the construction of a SNCR emissions control system at Crist Unit 6 is true, accurate and complete.”

Professional Engineer Signature:

Gregory N. Terry

Gregory N. Terry

Registration Number: 52786

5.27.2005

Date



**GULF POWER RESPONSE TO REQUEST FOR ADDITIONAL
INFORMATION REGARDING ADDITION OF SCNR TO UNIT 6
FILE No: 0330045-012-AC**

May 25, 2005

1. **FDEP Comment:** Page 3 of the application, Purpose of Application: Only the box for Air Construction permit has been checked. However, in the comment box on the same page, Item 3 has requested that the long term use of biomass be incorporated into the Title V permit. The construction permit that temporarily authorized the burning of biomass to determine the feasibility of burning it in order to reduce NO_x emissions expired October 4, 2003. Pursuant to Rule 62-213.420(1)(a)4., F.A.C., for a Title V operation permit revision application to have been considered a timely request, it must have been submitted at least ninety days prior to expiration of the construction permit, but no later than 180 days after the emissions unit commenced operation as modified. As such, there is no currently valid authorization for burning biomass that can be incorporated into a Title V permit. If Gulf Power desires to establish the authority to burn biomass as a new fuel during the current construction permit revision, please submit a summary of the results of the testing that was performed during the test burns in 2002 and 2003. Based on the results of the tests, provide an analysis comparing past actual emissions (prior to the burning of biomass) to future actual emissions (while burning biomass), and a statement of how the burning of biomass will affect the total annual heat input over the next five years. Include a statement of request specifying which of the four biomass fuels you would like to establish the authority to burn as new fuels, and the requested amount(s) of these fuels that can be burned hourly and annually without causing unstable conditions in the boilers.

Gulf Power Response: Gulf Power hereby withdraws our request to utilize Biomass fuel at this time since there is no short term immediate plan to use the fuel. The fuel will be re-evaluated as part of the Company's strategy to meet the Clean Air Interstate Rule.

2. **FDEP Comment:** Page 10 of the application, List of Pollutants Emitted by Facility: List contains a statement of "no change from previous Title V permit". It is suspected that with the addition of biomass burning in Units 4 and 5, and with the addition of SNCR on Unit 6, the pollutants that will be emitted from these units after being modified could be different than those currently emitted. Provide a complete list of all pollutants that will be emitted as a result of the modifications.

Gulf Power Response: Gulf Power anticipates no change of pollutants as a result of installation of the SNCR on Crist Unit 6. See item 6 in regards to ammonia slip.

3. **FDEP Comment:** Page 12 of the application, Additional Requirements for All Applications: Reference is made to the Title V application that was previously submitted 6/22/04. The ability to reference previously submitted information only applies to a Title V permit revision provided that the required information has been previously submitted within the past five years. Because this is a construction permit revision that will be allowing modifications to existing operations, the information required by this section of the application must be submitted in order to detail any changes as a result of the authorized modifications.

Gulf Power Comment: See Attachment 1 for Facility Plot Plan, Process Flow Diagram and Precautions to Prevent Emissions from Unconfined Particulate Matter.

4. **FDEP Comment:** Page 12 of the application, Additional Requirements for Air Construction Permit Applications: Box 3, Rule Applicability Analysis was not addressed. This information needs to be provided, especially as it relates to the requested modifications.

Gulf Power Comment: The installation of SNCR on Crist Unit 6 is expected to result in lower NO_x emissions and no increase in any other emissions other than the ammonia slip noted in item 6. The operation of the unit is not expected to increase as a result of the project, and therefore no associated increase in emissions. The addition of SNCR is not a "modification" and does not therefore trigger the need for a non-PSD or PSD construction permit. Please see Attachment 2 taken from the 06/22/04 previous Title V application for the rule applicability analysis. There are no changes in the rule applicability analysis previously submitted.

5. **FDEP Comment:** Regarding the Cooling Tower: The information submitted states that the new cooling tower will be a like kind replacement with the exception that the drift and evaluation percent of flow will be reduced from 2.4% to 2.1%. What is different about the new cooling tower that will provide the reduced drift? Explain the difference in design drift reduction (2.4% to 2.1%) and the estimated drift reduction (2% vs. 0.005%), and what effect these changes have on actual emissions from the cooling tower.

Gulf Power Comment: The need for this item was resolved with FDEP, thus Gulf Power hereby withdraws our request for permitting the replacement of the Unit 6 Cooling Tower.

6. **FDEP Comment:** Regarding the SNCR: Provide a description of the location of the urea injection ports, the degree of mixing that can be expected at the injection locations, and how the controller will adjust the injection rates/number of injectors required based on load changes. How will the proposed 5ppm ammonia slip emission rate (24 hour average) be monitored? The application states that the SNCR system is designed to remove 25% of the NO_x from the exhaust stream with a guarantee of 20% reduction. Based on the design and the location of the injection ports, is 25% reduction the maximum that can ever be achieved, or could a greater reduction be achieved if needed in the future? The application also states that the SNCR system is designed for 25% removal "when operating". Does that imply that The SNCR system will be operated at will, or that it will always be operating when the proper temperature is reached in the boiler?

Gulf Power Response: The urea injectors for the Crist 6 SNCR will be located at Elevation 171'-3". There will be a total of 6 injectors spaced across the front of the boiler. The system will be installed with a single level of injectors that will operate across the unit's load range. The concentration of the injected reagent will change as the load varies. The degree of mixing will depend on boiler load and the corresponding gas

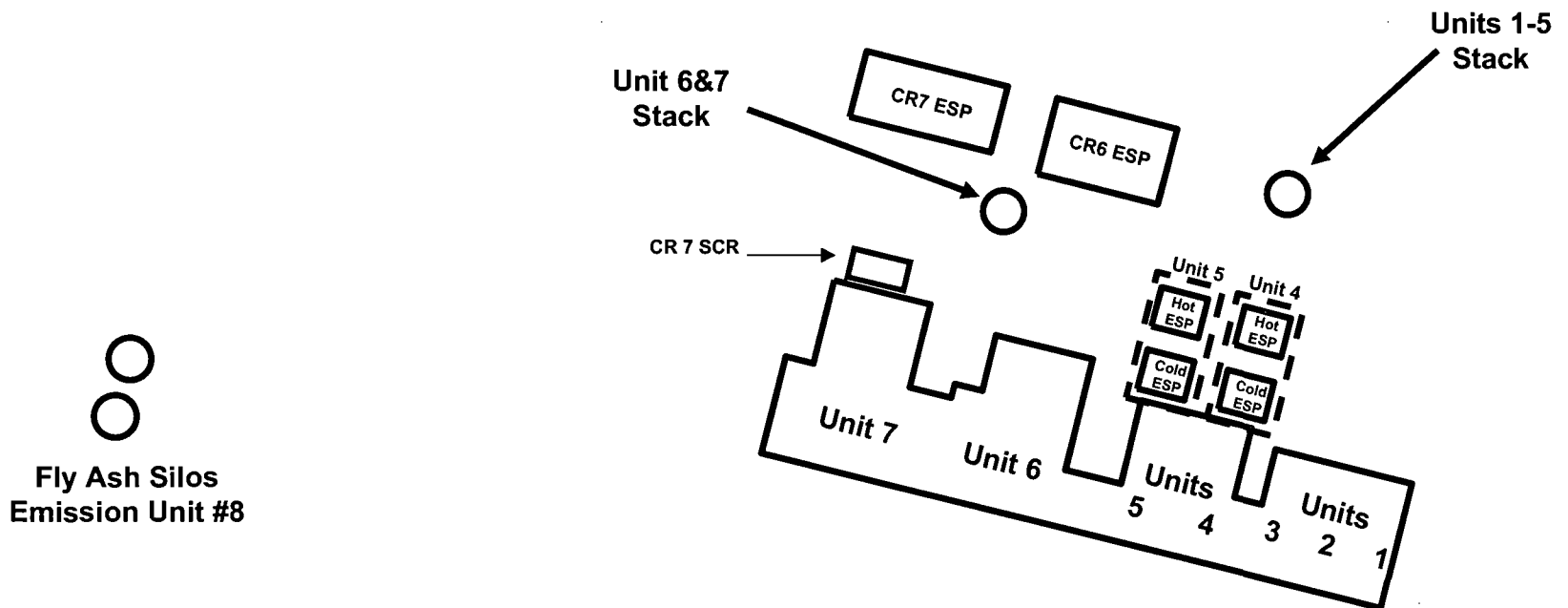
velocity profiles. The injector configuration will be designed to provide for maximum distribution and coverage over the load range and appropriate injection temperatures.

The ammonia slip average similar to Crist Unit 7 will not be continuously monitored. Currently, there is not a commercially-available instrument that provides a reliable and accurate NH₃ measurement. Wet chemistry will be utilized during the initial tuning of the system to establish an injection scheme that limits NH₃ slip to a 5 ppm 24 hour average. Additionally, Gulf Power Field Service's group will conduct initial and annual determinations utilizing FTIR (Fourier Transform Infra-Red) technology to demonstrate compliance to the 24 hour average ammonia slip.

The vendor guaranteed reduction of 20% is a conservative value based on the vendor's experience and modeling results. The vendor feels the design can accomplish 20% while complying with the 5 ppm NH₃ slip limit. A 25% reduction is the maximum design rate that is expected based on vendor modeling and experience.

The SNCR will operate as needed to meet the facility 0.20 lb/Mmbtu NO_x plant-wide emissions limit outlined in the FDEP-Gulf Ozone agreement. During these periods, the SNCR will operate whenever the Unit is operating at or above its normal low load level. If the Unit drops below this level, the SNCR system will automatically stop injection until the Unit returns to its low load level, thus the system will operate "at will" to comply to the facility limit.

Attachment 1:



Notes:

ESP - Electrostatic Precipitators (Control Equipment)

SCR – Selective Catalytic Reduction (Control Equipment)

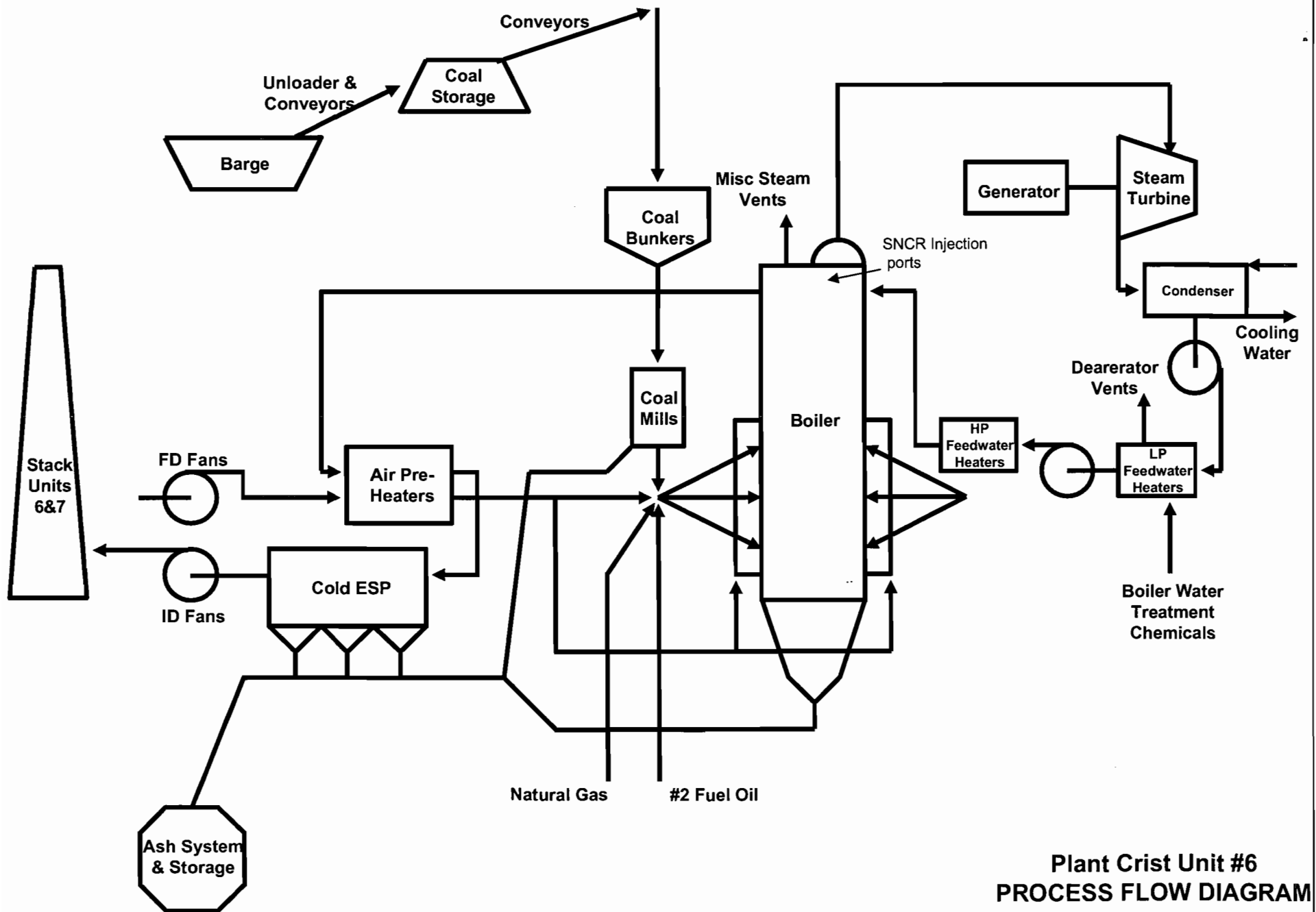
Not shown on this plan:

Emission Unit #9 - Material Handling of Coal and Ash and Roads (Fugitives)

Emission Unit #10 - Miscellaneous Emission Units (Tanks, Sandblasting, Cooling

Towers, Trivial, Exempt, Presumptively Exempt, and Non-regulated)

**PLANT CRIST
UNIT EMISSIONS
PLOT PLAN**



**Plant Crist Unit #6
PROCESS FLOW DIAGRAM**

PRECAUTIONS TO PREVENT EMISSIONS OF UNCONFINED PARTICULATE MATTER

1) TO PREVENT EMISSIONS OF UNCONFINED PARTICULATE MATTER WHILE UNLOADING FLY ASH, ASH LEAVING THE FACILITY WILL BE HAULED IN CLOSED CONTAINER TRUCKS. ASH BEING DISPOSED OF ON PLANT PROPERTY WILL BE MIXED WITH WATER AS IT IS BEING LOADED INTO THE TRUCKS FOR TRANSPORT TO LANDFILL.

2) THE PLANT ASH HAUL ROADS WILL BE WATERED AS NECESSARY TO CONTROL ANY UNCONFINED PARTICULATE MATTER THAT MAY BE ON THE ROADS.

3) AS SECTIONS OF THE ASH LANDFILL REACH THEIR CAPACITY THESE SECTIONS WILL BE GRASSED OVER TO PREVENT ANY PARTICULATE MATTER BEING LIFTED INTO THE WIND.

4) THE COAL PILE IS PACKED REGULARLY TO HELP IN THE PREVENTION OF COAL PILE FIRES AND LIMIT THE AMOUNT OF COAL DUST THAT MIGHT GET BLOWN OFF THE PILE IF IT WERE NOT PACKED.

5) A DUST SUPPRESSANT WILL BE APPLIED TO THE COAL ON THE CONVEYOR BELTS AS NECESSARY TO CONTROL DUST.

Attachment 2:

FDEP Rule	GULF POWER - CRIST UNIT 6 FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
Chapter 62-4 Permits						
62-4.030	General Prohibition.	0330045	✓		State Only	Facility
62-4.04(1)	Exemptions.	0330045	✓		State Only	Facility
62-4.100	Suspension and Revocation.	0330045	✓		State Only	Facility
62-4.130	Plant Operation - Problems.	0330045	✓		State Only	Facility
Chapter 62-204 State Implementation Plan						
62-204.800	Standards of Performance for New Stationary Sources (NSPS) (see 40 CFR 60 list for subsections).					
	(7) Standards Adopted.	0330045			State only.	Unit 006
	(b) The following Standards of Performance for New Stationary Sources contained in 40 CFR 60, revised as of July 1, 1994, or later as specifically indicated.	0330045		-	State only.	Unit 006
	1. 40 CFR 60.40 Subpart D, Fossil-fuel-fired Steam Generators for which Construction is Commenced after August 17, 1971.	0330045		-	State only.	Unit 006
	2. 40 CFR 60.40a Subpart Da, Electric Utility Steam Generators for which Construction is Commenced after September 18, 1978.	0330045		-	State only.	Unit 006
	3. 40 CFR 60.40b Subpart Db, Industrial-Commercial-Institutional Steam Generating Units.	0330045		-	State only.	Unit 006
	4. 40 CFR 60.40c Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units.	0330045		-	State only.	Unit 006
	12. 40 CFR 60.110 Subpart K, Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and prior to May 19, 1978.	0330045		-	State only.	Unit 006
	13. 40 CFR 60.110a Subpart Ka, Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after May 18, 1978, and prior to July 23, 1984.	0330045		-	State only.	Unit 006
62-204.800	14. 40 CFR 60.110b Subpart Kb, Volatile Organic Liquid Storage	0330045			State only.	Unit 006

FDEP Rule	GULF POWER - CRIST UNIT 6 FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
	Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.			-		
	29. 40 CFR 60.250 Subpart Y, Coal Preparation Plants.	0330045			State only.	Unit 006
	37. 40 CFR 60.330 Subpart GG, Stationary Gas Turbines.	0330045			State only.	Unit 006
	62. 40 CFR 60.670 Subpart OOO, Non-Metallic Mineral Processing Plants.	0330045		-	State only.	Unit 006
62-204.800(7)	(c) The Standards of Performance for New Stationary Sources adopted by reference in this section shall be controlling over other standards in this chapter except that any emissions limiting standard contained in or determined pursuant to this chapter which is more stringent than one contained in a Standard of Performance, or which regulates emissions of pollutants or emissions units not regulated by an applicable Standard of Performance, shall apply.	0330045		-	State only.	Unit 006
	(7)(d) General Provisions Adopted.	0330045			State only.	Unit 006
	(7)(e) Appendices Adopted. The following appendices of 40 CFR Part 60, revised as of July 1, 1994 or later as specifically indicated, are adopted and incorporated by reference.	0330045		-	State only.	Unit 006
	1. 40 CFR 60 Appendix A, Test Methods, are adopted by reference.	0330045			State only.	Unit 006
	2. 40 CFR 60 Appendix B, Performance Specifications.	0330045			State only.	Unit 006
	3. 40 CFR 60 Appendix C, Determination of Emission Rate Change.	0330045		-	State only.	Unit 006
	5. 40 CFR 60 Appendix F, Quality Assurance Procedures.	0330045			State only.	Unit 006
62-204.800(8)	National Emission Standards for Hazardous Air Pollutants (NESHAPS).					
	(8) Standards Adopted.	0330045			State only.	Unit 006
	(b)8. 40 CFR Part 61 Subpart M Asbestos.	0330045	✓		State only.	Unit 006
62-204.800(8)	(d) General Provisions Adopted. The general provisions of 40 CFR Part 61 Subpart A, revised July 1, 1994, are adopted and incorporated by reference except 40 CFR 61.04, 40 CFR 61.08, 40 CFR 61.11, and 40	0330045	✓		State only.	Unit 006

FDEP Rule	GULF POWER - CRIST UNIT 6 FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
	CFR 61.18.					
62-204.800(9)	National Emission Standards for Hazardous Air Pollutants (NESHAPS) - Part 63.					
	(9) Standards Adopted.	0330045			State only.	Unit 006
	(b) 40 CFR 63 Subpart Q Chromium Emissions from Industrial Process Cooling Towers*	0330045		-	State only. *This regulation was proposed for incorporation in the FAW on March 8, 1996; not yet "effective" on state level.	Unit 006
	(a) 40 CFR 63 Subpart T Halogenated Solvent Cleaning*	0330045		-	State only. *This regulation was proposed for incorporation in the FAW on March 8, 1996; not yet "effective" on state level.	Unit 006
	(d) General Subparts Adopted.	0330045			State only.	Unit 006
	1. 40 CFR 63 Subpart A, General Provisions	0330045			State only.	Unit 006
	2. 40 CFR 63 Subpart B, Equivalent Emission Limitation by Permit (112(j))	0330045		-	State only.	Unit 006
	4. 40 CFR 63 Subpart D, Compliance Extensions for Early Reductions	0330045		-	State only.	Unit 006
62-204.800 (11)	Adoption of 40 CFR 70, Federal Title V Rule	0330045	✓		State only.	Facility
62-204.800 (12)	Adoption of 40 CFR 72, Federal Acid Rain Program	0330045	✓		State only.	Unit 006
62-204.800 (13)	Adoption of 40 CFR 73, S02 Allowance System	0330045	✓		State only.	Unit 006
62-204.800 (14)	Adoption of 40 CFR 75, CEMS	0330045	✓		State only.	Unit 006
62-204.800 (15)	Adoption of 40 CFR 76, Acid Rain Nox Requirement	0330045	✓		State only.	Unit 006
62-204.800 (16)	Adoption of 40 CFR 77, Acid Rain Excess Emissions	0330045	✓		State only.	Unit 006
62-204.800 (19)	Adoption of 40 CFR 82, Stratospheric Ozone	0330045	✓		State only.	Unit 006/ Facility

FDEP Rule	GULF POWER - CRIST UNIT 6 FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
Chapter 62-210 Stationary Sources - General Requirements						
62-210.300	Permits Required.					
	(2) Air Operation Permits. Except (b)	0330045	✓			Facility
	(3)(a) Exemptions - #1-29.	0330045	✓			Facility
	(3)(b) Temporary Exemptions.	0330045	✓			Facility
62-210.300	(5) Notification of Startup. The owners or operator of any emissions unit or facility which has a valid air operation permit which has been shut down more than one year, shall notify the Department in writing of the intent to start up such emissions unit or facility, a minimum of 60 days prior to the intended startup date.	0330045	✓		May apply in the future.	Facility
	(a) The notification shall include information as to the startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.	0330045	✓		May apply in the future.	Facility
	(b) If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Department as soon as possible after the date of such startup is ascertained.	0330045	✓		May apply in the future.	Facility
62-210.370	Reports.					
	(1) Notification of Intent to Relocate Air Pollutant Emitting Facility.	0330045				Unit 006
	(3) Annual Operating Report for Air Pollutant Emitting Facility.	0330045	✓			Facility
62-210.650	Circumvention.	0330045				Unit 006
62-210.700	Excess Emissions.	0330045	✓			Unit 006
62-210.900	Forms and Instructions.	0330045	✓			Facility
	(5) Annual Operating Reports	0330045	✓			Facility
Chapter 62-213 Operation Permits for Major Sources of Air Pollution						
62-213.205	Annual Emissions Fee.	0330045	✓			Facility

FDEP Rule	GULF POWER - CRIST UNIT 6 FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
62-213.400	Permits and Permit Revisions Required.	0330045	✓			Facility
62-213.410	Changes Without Permit Revision.	0330045	✓			Facility
62-213.415	Trading of Emissions Within a Source.	0330045	✓		May apply in the future.	Unit 006 /Facility
62-213.460	Permit Shield.	0330045	✓			Facility
Chapter 62-214 Requirements for Sources Subject to the Federal Acid Rain Program						
62-214.300	Applicability.	0330045	✓			Unit 006
62-214.340	Exemptions.					
	(5) The owners and operators of each unit . . .	0330045	✓			Unit 006
	(6) A new unit shall no longer be exempted . . .	0330045				Unit 006
	(7) A retired unit shall no longer be exempted . . .	0330045	✓			Unit 006
62-214.350	Certification.	0330045	✓			Unit 006
62-214.430	Implementation and Termination of Compliance Options. Procedures for activation and termination of compliance options.					
	(1) Activation.	0330045	✓			Unit 006
	(2) Termination.	0330045	✓			Unit 006
Chapter 62-252 Gasoline Vapor Control						
62-252.300	Gasoline Dispensing Facilities - Stage I Vapor Recovery.					
	(2) Prohibition.	0330045				Facility
	(3) Control Technology Requirements.	0330045				Facility
	(4) Compliance Schedule.	0330045			State Only	Facility
62-252.400	Gasoline Dispensing Facilities - Stage II Vapor Recovery.					
	(2) Prohibition.	0330045			State Only	Facility

FDEP Rule	GULF POWER - CRIST UNIT 6 FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
	(3) Control Technology Requirements.	0330045			State Only	Facility
	(4) Compliance Schedules.	0330045			State Only	Facility
	(5) Testing.	0330045			State Only	Facility
	(6) Recordkeeping.	0330045			State Only	Facility
	(7) System Maintenance.	0330045			State Only	Facility
62-252.400	(8) Training.	0330045			State Only	Facility
62-252.500	Gasoline Tanker Trucks.					
	(2) Prohibitions.	0330045			State Only	Facility
	(3) Leak Testing.	0330045			State Only	Facility
Chapter 62-256 Open Burning and Frost Protection Fires						
62-256.300	Prohibitions.	0330045	✓		State Only	Facility
62-256.450	Burning for Cold or Frost Protection.	0330045			State Only	Facility
62-256.500	Land Clearing.	0330045	✓		State Only	Facility
62-256.600	Industrial, Commercial, Municipal, and Research Open Burning.	0330045	✓		State Only	Facility
62-256.700	Open Burning Allowed.	0330045	✓		State Only	Facility
Chapter 62-257 Asbestos Removal						
62-257.301	Notification Procedure and Fee.	0330045	✓		State Only	Facility
62-257.400	Fee Schedule.	0330045	✓		State Only	Facility
62-257.900	Form.	0330045	✓		State Only	Facility
Chapter 62-281 Motor Vehicle Air Conditioning Refrigerant Recovery and Recycling.						
62-281.300	Applicability.	0330045			State Only	Facility
62-281.400	Compliance Requirements.	0330045			State Only	Facility

FDEP Rule	GULF POWER - CRIST UNIT 6 FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
62-281.500	Establishment Certification.					
62-281.500	(1) Initial Certification.	0330045			State Only	Facility
	(2) Renewal Certification.	0330045			State Only	Facility
	(3) Fees.	0330045			State Only	Facility
	(4) Certificate of Compliance.	0330045			State Only	Facility
62-281.600	Training Requirements.	0330045			State Only	Facility
62-281.700	Equipment Certification.	0330045			State Only	Facility
62-281.900	Forms.	0330045			State Only	Facility
Chapter 62-296 Stationary Sources -- Emission Standards						
62-296.320	General Pollutant Emission Limiting Standards.					
	(1) Volatile organic compounds emissions or organic solvents emissions.	0330045		-		Facility
	(2) Objectionable Odor Prohibited.	0330045	✓			Facility
	(3) Open Burning.	0330045	✓		State Only	Facility
	(4)(a) Process Weight Table.	0330045				Unit 006
	(4)(b) General Visible Emissions Standard.	0330045	✓			Facility
	(4)(c) Unconfined Emissions of Particulate Matter.	0330045	✓			Facility
62-296.405	Fossil Fuel Steam Generators with More than 250 Million Btu per Hour Heat Input.					
	(1) Existing Emissions Units.					
	(a) Visible emissions.	0330045	✓			Unit 006
	(b) Particulate Matter - 0.1 pound per million Btu heat input, as measured by applicable compliance methods.	0330045	✓			Unit 006
	(c) Sulfur Dioxide, as measured by applicable compliance methods.	0330045	✓			Unit 006

FDEP Rule	GULF POWER - CRIST UNIT 6 FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
	1. (c) e. Sources burning liquid fuel.	0330045	✓		1.98 lbs/MBTU	Unit 006
	2. (c) Sources burning solid fuel.	0330045	✓		5.90 lbs/MBTU	Unit 006
	3. Owners of fossil fuel steam generators shall monitor their emissions and the effects of the emissions on ambient concentrations of sulfur dioxide, in a manner, frequency, and locations approved, and deemed reasonably necessary and ordered by the Department.	0330045	✓		Not currently listed in permit. No notice deemed necessary to plant.	Unit 006
	(d) Nitrogen Oxides (expressed as NO _x).	0330045				Unit 006
62-296.405	(e) Test Methods and Procedures.	0330045	✓		Presumably federally enforceable.	Unit 006
	(f) Continuous Emissions Monitoring Requirements.	0330045	✓			Unit 006
	(g) Quarterly Reporting Requirements.	0330045	✓			Unit 006
	(2) New Emissions Units.					
	(a) Visible Emissions - See Rule 62-204.800(7) and 40 CFR 60.42 and 60.42a	0330045		-		Unit 006
	(b) Particulate Matter - See Rule 62-204.800(7) and 40 CFR 60.42 and 60.42a	0330045		-		Unit 006
	(c) Sulfur Dioxide - See Rule 62-204.800(7) and 40 CFR 60.43 and 60.43a	0330045		-		Unit 006
	(d) Nitrogen Oxides - See Rule 62-204.800(7) and 40 CFR 60.44 and 60.44a	0330045		-		Unit 006
62-296.406	Fossil Fuel Steam Generators with Less than 250 Million Btu per Hour Heat Input, New and Existing Emissions Units.					
	(1) Visible Emissions	0330045				Unit 006
	(2) Particulate Matter - Best available control technology in accordance with Rule 62-210.200(40)	0330045		-		Unit 006
	(3) Sulfur Dioxide - Best available control technology in accordance with Rule 62-210.200(40)	0330045		-		Unit 006

FDEP Rule	GULF POWER - CRIST UNIT 6 FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
62-296.411	Sulfur Storage and Handling Facilities	0330045				Unit 006
62-296.500	Reasonably Available Control Technology (RACT) - Volatile Organic Compounds (VOC) and Nitrogen Oxides (NO _x) Emitting Facilities.					
	(1) Applicability.	0330045				Unit 006
	(2) Permit, Recordkeeping, and Compliance Reporting Requirements.	0330045				Unit 006
	(a) Permits - Special Considerations.	0330045				Unit 006
	(b) Recordkeeping.	0330045				Unit 006
62-296.500	(c) Reporting.	0330045				Unit 006
	(3) Exceptions.	0330045				Unit 006
	(4) Consideration of Exempt Solvents	0330045				Unit 006
	(5) Compliance may be demonstrated for surface coating and graphic arts facilities on a 24-hour weighted average basis for a single source point with a single emission limit.	0330045		-		Unit 006
62-296.508	Petroleum Liquid Storage					
	(1) Applicability.	0330045				Unit 006
	(2) Control Technology.	0330045				Unit 006
	(3) Test Methods and Procedures.	0330045				Unit 006
62-296.511	Solvent Metal Cleaning.					
	(1) Applicability.	0330045				Unit 006
	(2) Cold Cleaning Control Technology.	0330045				Unit 006
	(3) Open Top Vapor Degreaser Control Technology.	0330045				Unit 006
	(4) Conveyorized Degreaser Control Technology.	0330045				Unit 006
	(5) Test Methods and Procedures.	0330045		-	* 8-hr test requirement not in SIP.	Unit 006

FDEP Rule	GULF POWER - CRIST UNIT 6 FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
62-296.516	Petroleum Liquid Storage Tanks with External Floating Roofs					
	(1) Applicability.	0330045				Unit 006
	(2) Control Technology.	0330045				Unit 006
	(3) Test Methods and Procedures.	0330045				Unit 006
62-296.570	Reasonably Available Control Technology (RACT) - Requirements for Major VOC- 0330045 and NO _x - Emitting Facilities.					
	(1) Applicability.	0330045			State Only	Unit 006
	(2) Compliance Requirements.	0330045			State Only	Unit 006
62-296.570	(3) Operation Permit Requirements.	0330045			State Only	Unit 006
	(4) RACT Emission Limiting Standards.	0330045			State Only	Unit 006
	(a) Compliance Dates and Monitoring.	0330045			State Only	Unit 006
	(b) Emission Limiting Standards.	0330045			State Only	Unit 006
	(c) Exception for Startup, Shutdown or Malfunction.	0330045			State Only	Unit 006
62-296.700	Reasonably Available Control Technology (RACT) Particulate Matter.					
	(1) Applicability.	0330045				Unit 006
	(2) Exemptions.	0330045				Unit 006
	(3) Specific RACT Emission Limiting Standards for Stationary Emissions Units.	0330045			-	Unit 006
	(4) Maximum Allowable Emission Rates.	0330045				Unit 006
	(a) Emissions Unit Data.	0330045				Unit 006
	(b) Maximum Emission Rates.	0330045				Unit 006
	(5) Circumvention.	0330045				Unit 006
	(6) Operation and Maintenance Plan.	0330045				Unit 006

FDEP Rule	GULF POWER - CRIST UNIT 6 FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
	(a) Air Pollution Control Devices and Collection Systems.	0330045				Unit 006
	(b) Control Equipment Data.	0330045				Unit 006
	(c) Processing or Materials Handling Systems.	0330045				Unit 006
	(d) Fossil Fuel Steam Generators.	0330045				Unit 006
62-296.702	Fossil Fuel Steam Generators.					
	(1) Applicability.	0330045				Unit 006
	(2) Emission Limitations.	0330045				Unit 006
	(a) Particulate Matter - 0.10 lb/mmBtu	0330045				Unit 006
62-296.711	(b) Visible Emissions - 20% opacity.	0330045				Unit 006
	(3) Test Methods and Procedures.	0330045				Unit 006
	Materials Handling, Sizing, Screening, Crushing and Grinding Operations.					
	(1) Applicability	0330045				Unit 006
	(2) Emission Limitations.	0330045				Unit 006
	(3) Test Methods and Procedures.	0330045				Unit 006
Chapter 62-297 Stationary Sources -- Emission Monitoring						
62-297.310	General Test Requirements.	0330045	✓			Unit 006
	(1) Required Number of Test Runs	0330045	✓			Unit 006
	(2) Operating Rate During Testing	0330045	✓			Unit 006
	(3) Calculation of Emission Rate	0330045	✓			Unit 006
	(4) Applicable Test Procedures.	0330045	✓			Unit 006
	(a) Required Sampling Time.	0330045	✓			Unit 006
	1. Unless otherwise specified in the applicable rule, the required	0330045	✓			Unit 006

FDEP Rule	GULF POWER - CRIST UNIT 6 FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
	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.	0330045	✓			Unit 006
	(b) Minimum Sample Volume.	0330045	✓			Unit 006
	(c) Required Flow Rate Range.	0330045	✓			Unit 006
	(d) Calibration.	0330045	✓			Unit 006
	(e) EPA Method 5.	0330045	✓			Unit 006
	(5) Determination of Process Variables.	0330045	✓			Unit 006
	(6) Required Stack Sampling Facilities					
	(a) Permanent Test Facilities.	0330045	✓			Unit 006
	(b) Temporary Test Facilities.	0330045				Unit 006
	(c) Test Facilities.	0330045	✓			Unit 006
62-297.310	1. Sampling Ports.	0330045	✓			Unit 006
	(d) Work Platforms.	0330045	✓			Unit 006
	(e) Access.	0330045	✓			Unit 006
	(f) Electrical Power.	0330045	✓			Unit 006
	(g) Sampling Equipment Support.	0330045	✓			Unit 006
	(7) Frequency of Compliance Tests.					
	(a) General Compliance Testing.	0330045	✓			Unit 006
	1. Compliance test requirement prior to obtaining operating permit.	0330045				Unit 006
	2. Annual test requirement for excess PM emissions.	0330045	✓			Unit 006
	3. Annual test requirement prior to obtaining renewal permit.	0330045	✓			Unit 006

FDEP Rule	GULF POWER - CRIST UNIT 6 FDEP APPLICABLE REQUIREMENTS LIST FDEP Title,	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
	4.(a) Annual VE test,	0330045	✓			Unit 006
	(b) Annual test for lead, acrylonitride and other regulated pollutants,	0330045				Unit 006
	(c) Annual test for each NESHAP pollutant	0330045				Unit 006
	5. No annual PM test required if burn no liquid and/or solid fuel for greater than 400 hrs/year.	0330045		-		Unit 006
	6. Exemption from semi-annual PM test for steam generators.	0330045				Unit 006
	7. Exemption from quarterly PM test for units not utilizing liquid and/or solid fuel for more than 100 hrs.	0330045		-		Unit 006
	8. Five year VE test requirement for units that operate no more than 400 hrs/year.	0330045		-		Unit 006
	9. Fifteen day advance notification requirement prior to test.	0330045	✓			Unit 006
	10. Compliance test exemption for exempt units and units utilizing a general permit.	0330045		-		Unit 006
62-297.310	(b) Special Compliance Tests.	0330045	✓		Applicable upon any complaint.	Unit 006
	(c) Waiver of Compliance Test Requirement.	0330045	✓		SO2 24 hour CEM/ FS&A program in lieu of annual compliance test.	Unit 006
	(8) Test Reports.	0330045	✓			Unit 006

EPA Rule	GULF POWER - CRIST UNIT 6 EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
a						
Part 60 - EPA Regulations on Standards of Performance for New Stationary Sources						
Subpart A — General Provisions						
60.7	Notification and record keeping.	0330045				Unit 006
60.8	Performance tests.	0330045				Unit 006
60.11	Compliance with standards and maintenance requirements.	0330045				Unit 006
60.12	Circumvention.	0330045				Unit 006
60.13	Monitoring requirements	0330045				Unit 006
60.19	General notifications and reporting requirements	0330045				Unit 006
Subpart D — Standards of Performance for Fossil-Fuel Fired Steam Generators for Which Construction is Commenced After August 17, 1971						
60.42	Standard for particulate matter.	0330045				Unit 006
60.43	Standard for sulfur dioxide.	0330045				Unit 006
60.44	Standard for nitrogen oxides.	0330045				Unit 006
60.45	Emission and fuel monitoring.	0330045				Unit 006
60.46	Test methods and procedures.	0330045				Unit 006
Subpart Da — Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978						
60.42a	Standard for particulate matter.	0330045				Unit 006
60.43a	Standard for sulfur dioxide.	0330045				Unit 006
60.44a	Standard for nitrogen oxides.	0330045				Unit 006
60.45a	Commercial demonstration permit.	0330045		X		Unit 006
60.46a	Compliance provisions.	0330045				Unit 006

EPA Rule	GULF POWER - CRIST UNIT 6 EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
60.47a	Emission monitoring.	0330045				Unit 006
60.48a	Compliance determination procedures and methods.	0330045				Unit 006
60.49a	Reporting requirements.	0330045				Unit 006
Subpart Db — Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units						
60.42b	Standard for sulfur dioxide.	0330045				Unit 006
60.43b	Standard for particulate matter.	0330045				Unit 006
60.44b	Standard for nitrogen oxides.	0330045				Unit 006
60.45b	Compliance and performance test methods and procedures for sulfur dioxide.	0330045		-		Unit 006
60.46b	Compliance and performance test methods and procedures for particulate matter and nitrogen oxides.	0330045		-		Unit 006
60.47b	Emission monitoring for sulfur dioxide.	0330045				Unit 006
60.48b	Emission monitoring for particulate matter and nitrogen oxides.	0330045				Unit 006
60.49b	Reporting and recordkeeping.	0330045				Unit 006
Subpart Dc — Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units						
60.42c	Standard for sulfur dioxide.	0330045				Unit 006
60.43c	Standard for particulate matter.	0330045				Unit 006
60.44c	Compliance and performance test methods and procedures for sulfur dioxide.	0330045		-		Unit 006
60.45c	Compliance and performance test methods and procedures for particulate matter.	0330045		-		Unit 006
60.46c	Emission monitoring for sulfur dioxide.	0330045				Unit 006
60.47c	Emission monitoring for particulate matter.	0330045				Unit 006

EPA Rule	GULF POWER - CRIST UNIT 6 EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
60.48c	Reporting and recordkeeping.	0330045				Unit 006
Subpart K — Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978						
60.112	Standard for volatile organic compounds (VOC).	0330045				Unit 006
60.113	Monitoring of operations.	0330045				Unit 006
Subpart Ka — Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984						
60.112a	Standard for volatile organic compounds (VOC).	0330045				Unit 006
60.113a	Testing and procedures.	0330045				Unit 006
60.114a	Alternative means of emission limitations.	0330045				Unit 006
60.115a	Monitoring of operations.	0330045				Unit 006
Subpart Kb — Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984						
60.112b	Standard for volatile organic compounds (VOC).	0330045				Unit 006
60.113b	Testing and procedures.	0330045				Unit 006
60.114b	Alternative means of emission limitations.	0330045				Unit 006
60.115b	Recordkeeping and reporting requirements.	0330045				Unit 006
60.116b	Monitoring of operations.	0330045				Unit 006
Subpart Y — Standards of Performance for Coal Preparation Plants						
60.252	Standard for particulate matter.	0330045				Unit 006
60.253	Monitoring of operations.	0330045				Unit 006

EPA Rule	GULF POWER - CRIST UNIT 6 EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
60.254	Test methods and procedures.	0330045				Unit 006
Subpart GG — Standards of Performance for Stationary Gas Turbines						
60.332	Standard for nitrogen oxides.	0330045				Unit 006
60.333	Standard for sulfur dioxide.	0330045				Unit 006
60.334	Monitoring of operations.	0330045				Unit 006
60.335	Test methods and procedures.	0330045				Unit 006
Subpart OOO — Standards of Performance for Nonmetallic Mineral Processing Plants						
60.672	Standard for Particulate Matter.	0330045				Unit 006
60.674	Monitoring of Operations.	0330045				Unit 006
60.676	Reporting and Recordkeeping.	0330045				Unit 006
Part 61 - EPA Regulations on National Emission Standards for Hazardous Air Pollutants						
Subpart A — General Provisions						
61.05	Prohibited Activities.	0330045	✓			Facility
61.09	Notification of Startup.	0330045				Facility
61.10	Source Reporting and Request for Waiver of Compliance.	0330045				Facility
61.11	Waiver of Compliance.	0330045				Facility
61.12(b)	Compliance with Standards and Maintenance Requirements.	0330045	✓			Facility
61.13	Emission Tests and Waiver of Emission Tests.	0330045				Facility
61.14	Monitoring Requirements.	0330045				Facility
61.19	Circumvention.	0330045				Facility
Subpart M — National Emission Standards for Asbestos		0330045	✓			Facility

EPA Rule	GULF POWER - CRIST UNIT 6 EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
Appendix C to Part 61 — Quality Assurance Procedures		0330045	✓			Facility
Part 63 - EPA Regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories						
Subpart A — General Provisions						
63.4	Prohibited Activities and Circumvention.	0330045		X		Unit 006
63.6	Compliance with Standards and Maintenance Requirements.	0330045				Unit 006
63.7	Performance Testing Requirements.	0330045				Unit 006
63.8	Monitoring Requirements.	0330045				Unit 006
63.9	Notification Requirements.	0330045				Unit 006
63.10	Reporting and Recordkeeping Requirements.	0330045				Unit 006
63.11	Control Device Requirements.	0330045				Unit 006
Subpart Q — National Emission Standards for Industrial Process Cooling Towers						
63.402	Standard.	0330045				Unit 006
63.403	Compliance Dates.	0330045				Unit 006
63.404	Compliance Demonstrations.	0330045				Unit 006
63.405	Notification Requirements.	0330045				Unit 006
63.406	Recordkeeping and Reporting Requirements.	0330045				Unit 006
Subpart T — National Emission Standards for Halogenated Solvent Cleaning						
63.462	Batch Cold Cleaning Machine Standards.	0330045				Unit 006
63.463	Batch Vapor and In-Line Cleaning Machine Standards.	0330045				Unit 006
63.464	Alternative Standards.	0330045				Unit 006
63.465	Test Methods.	0330045				Unit 006

EPA Rule	GULF POWER - CRIST UNIT 6 EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
63.466	Monitoring Procedures.	0330045				Unit 006
63.467	Recordkeeping Requirements.	0330045				Unit 006
63.468	Reporting Requirements.	0330045				Unit 006
Part 72 - EPA Acid Rain Program Permits						
Subpart A — General Provisions						
72.7	New Units Exemption.	0330045				Unit 006
72.8	Retired Units Exemption.	0330045				Unit 006
72.9	Standard Requirements.	0330045	✓			Unit 006
Subpart B — Designated Representative						
72.20	Authorization and Responsibilities of the Designated Representative	0330045	✓			Unit 006
72.21	Submissions.	0330045	✓			Unit 006
72.22	Alternate Designated Representative.	0330045	✓			Unit 006
72.23	Changing the Designated Representative, Alternate Designated Representative; Changes in the Owners and Operators.	0330045	✓			Unit 006
Subpart C — Acid Rain Applications						
72.30	Requirements to Apply.	0330045	✓			Unit 006
72.32	Permit Applications Shield and Binding Effect of Permit Application.	0330045	✓			Unit 006
72.33	Identification of Dispatch System.	0330045	✓			Unit 006
Subpart D — Acid Rain Compliance Plan and Compliance Options						
72.40	General.	0330045	✓			Unit 006
72.41	Phase I Substitution Plans.	0330045				Unit 006

EPA Rule	GULF POWER - CRIST UNIT 6 EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
72.42	Phase I Extension Plans.	0330045	✓		Crist Unit 6 & 7	Unit 006
72.43	Phase I Reduced Utilization Plans.	0330045	✓			Unit 006
72.44	Phase II Repowering Extensions.	0330045				Unit 006
Subpart E — Acid Rain Permit Contents						
72.51	Permit Shield.	0330045	✓			Unit 006
Subpart I - Compliance Certification						
72.90	Annual Compliance Certification Report.	0330045	✓			Unit 006
72.91	Phase I Unit Adjusted Utilization.	0330045	✓			Unit 006
72.92	Phase I Unit Allowance Surrender.	0330045	✓			Unit 006
72.93	Units with Phase I Extension Plans.	0330045				Unit 006
72.94	Units with Repowering Extension Plans.	0330045				Unit 006
Part 73 - EPA Acid Rain Program Sulfur Dioxide Allowance System						
Subpart C — Allowance Tracking System						
73.33	Authorized Account Representative	0330045	✓			Unit 006
73.35	Compliance.	0330045	✓			Unit 006
Part 75 - EPA Acid Rain Program For Continuous Emission Monitoring						
Subpart A — General						
75.4	Compliance Dates.	0330045	✓			Unit 006
75.5	Prohibitions.	0330045	✓			Unit 006
Subpart B — Monitoring Provisions						
75.10	General Operating Requirements.	0330045	✓			Unit 006

EPA Rule	GULF POWER - CRIST UNIT 6 EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
75.11	Specific Provisions for Monitoring SO ₂ Emissions (SO ₂ and Flow Monitors).	0330045	✓			Unit 006
75.12	Specific Provisions for Monitoring NO _x Emissions (NO _x and Diluent Gas Monitors).	0330045	✓			Unit 006
75.13	Specific Provisions for Monitoring CO ₂ Emissions.	0330045	✓			Unit 006
75.14	Specific Provisions for Monitoring Opacity.	0330045	✓			Unit 006
75.15	Specific Provisions for Monitoring SO ₂ Emissions Removal by Qualifying Phase I Technology.	0330045		–		Unit 006
75.16	Specific Provisions for Monitoring Emissions from Common, By-Pass, and Multiple Stacks for SO ₂ Emissions and Heat Input Determinations.	0330045		–		Unit 006
75.17	Specific Provisions for Monitoring Emissions from Common, By-Pass, and Multiple Stacks for NO _x Emission Rate.	0330045		–		Unit 006
75.18	Specific Provisions for Monitoring Emissions from Common, By-Pass, and Multiple Stacks for Opacity.	0330045		–		Unit 006
Subpart C — Operation and Maintenance Requirements						
75.20	Certification and Recertification Procedures.	0330045	✓			Unit 006
75.21	Quality Assurance and Quality Control Requirements.	0330045	✓			Unit 006
75.22	Reference Test Methods.	0330045	✓			Unit 006
75.24	Out-of-Control Periods.	0330045	✓			Unit 006
Subpart D — Missing Data Substitution Procedures						
75.30	General Provisions.	0330045	✓			Unit 006
75.31	Initial Missing Data Procedures.	0330045	✓			Unit 006
75.32	Determination of Monitor Data Availability for Standard Missing Data Procedures.	0330045	✓			Unit 006
75.33	Standard Missing Data Procedures.	0330045	✓			Unit 006

EPA Rule	GULF POWER - CRIST UNIT 6 EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
75.34	Units with Add-On Emission Controls.	0330045				Unit 006
75.35	Missing Data Procedures for CO2	0330045	✓			Unit 006
75.36	Missing Data Procedures for Heat Input	0330045	✓			Unit 006
Subpart E — Alternative Monitoring Systems						
75.40	General Demonstration Requirements.	0330045				Unit 006
75.41	Precision Criteria.	0330045				Unit 006
75.42	Reliability Criteria.	0330045				Unit 006
75.43	Accessibility Criteria.	0330045				Unit 006
75.44	Timeliness Criteria.	0330045				Unit 006
75.45	Daily Quality Assurance Criteria.	0330045				Unit 006
75.46	Missing Data Substitution Criteria.	0330045				Unit 006
75.47	Criteria for a Class of Affected Units.	0330045				Unit 006
75.48	Petition for an Alternative Monitoring System.	0330045				Unit 006
Subpart F — Recordkeeping Requirements						
75.50	General Recordkeeping Provisions.	0330045	✓			Unit 006
75.51	General Recordkeeping Provisions for Specific Situations.	0330045				Unit 006
75.52	Certification, Quality Assurance, and Quality Control Record Provisions.	0330045	✓			Unit 006
75.53	Monitoring Plan.	0330045	✓			Unit 006
75.54	General Recordkeeping Provisions	0330045	✓			Unit 006
75.55	General Recordkeeping Provisions for Special Situations	0330045	✓			Unit 006

EPA Rule	GULF POWER - CRIST UNIT 6 EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
75.56	Certification, Quality Assurance and Quality Control Record Provision	0330045	✓			Unit 006
Subpart G — Reporting Requirements						
75.60	General Provisions.	0330045	✓			Unit 006
75.61	Notification of Certification and Recertification Test Dates.	0330045	✓			Unit 006
75.62	Monitoring Plan.	0330045	✓			Unit 006
75.63	Certification or Recertification Applications.	0330045	✓			Unit 006
75.64	Quarterly Reports.	0330045	✓			Unit 006
75.65	Opacity Reports.	0330045	✓			Unit 006
Appendix A to Part 75 — Specifications and Test Procedures		0330045	✓			Unit 006
Appendix B to Part 75 — Quality Assurance and Quality Control Procedures		0330045	✓			Unit 006
Appendix C to Part 75 — Missing Data Statistical Estimation Procedures		0330045	✓			Unit 006
Appendix D to Part 75 — Optional SO ₂ Emissions Data Protocol for Gas-Fired Units and Oil-Fired Units		0330045		-		Unit 006
Appendix E to Part 75 — Optional NO _x Emissions Estimation Protocol for Gas-Fired Peaking Units and Oil-Fired Peaking Units		0330045		-		Unit 006
EPA Part 76 - Acid Rain Nitrogen Oxides Emission Reduction Program						
76.5	NO _x Emission Limitations for Group 1 Boilers.	0330045	✓			Unit 006
76.8	Early Election for Group 1, Phase II Boilers.	0330045				Unit 006
76.9	Permit Applications and Compliance Plans.	0330045	✓			Unit 006
76.10	Alternative Emission Limitations.	0330045	✓			Unit 006
76.11	Emissions Averaging.	0330045	✓			Unit 006
76.12	Phase I NO _x Compliance Extensions.	0330045				Unit 006

EPA Rule	GULF POWER - CRIST UNIT 6 EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
76.13	Compliance and Excess Emissions	0330045	✓			Unit 006
76.14	Monitoring, Recordkeeping, and Reporting.	0330045	✓		Cost reporting under 76.14 (c).	Unit 006
76.15	Test Methods and Procedures.	0330045	✓		Only if AEL is requested.	Unit 006
EPA Part 77 - Excess Emissions						
77.3	Offset Plans	0330045	✓			Unit 006
77.5(b)	Deduction of Allowances	0330045	✓			Unit 006
77.6	Excess Emission Penalties for SO2 and Nox; and	0330045	✓			Unit 006
EPA Part 82 - Protection Of Stratospheric Ozone						
Subpart B - Servicing of Motor Vehicle Air Conditioners						
82.34	Prohibitions.	0330045	✓			Facility
82.36	Approved refrigerant recycling equipment.	0330045	✓			Facility
82.38	Approved independent standards testing organizations.	0330045	✓			Facility
82.40	Technician training and certification.	0330045	✓			Facility
82.42	Certification, recordkeeping and public notification requirements.	0330045	✓			Facility
Subpart F - Recycling and Emissions Reduction						
82.154	Prohibitions.	0330045	✓			Facility
82.156	Required practice.	0330045	✓			Facility
82.158	Standards for recycling and recovery equipment.	0330045	✓			Facility
82.160	Approved equipment testing organizations.	0330045	✓			Facility
82.161	Technician certification.	0330045	✓			Facility
82.162	Certification by owners of recovery and recycling equipment.	0330045	✓			Facility

EPA Rule	GULF POWER - CRIST UNIT 6 EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
82.164	Reclaimer certification.	0330045	✓			Facility
82.166(k)(m)	Reporting and recordkeeping requirements for owners/operators.	0330045	✓			Facility
40 CFR 279.72	Used Oil Regulations.	0330045	✓		Facility burns on-spec used oil.	Facility

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111



Certified Mail

January 18, 2005

Jonathan Holtom
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

RECEIVED

JAN 25 2005

BUREAU OF AIR REGULATION

Dear Mr. Holtom:

RE: CRIST ELECTRIC GENERATING PLANT
CONSTRUCTION PERMIT APPLICATION
SNCR, Cooling Tower Replacement, Biomass, Mercury Test Center
Permit No: 0330045-009-AV

Please find enclosed Gulf Power's application for construction permit for several projects currently in planning at the Crist Electric Generating Plant located in Pensacola, Florida. Included in the application are the required certifications by the Responsible Official and Professional Engineer registered in Florida.

As you may be aware, Gulf Power's schedule to begin construction on these projects is critical pursuant to damages sustained by Hurricane Ivan and due to engineering & design delays due to the hurricane's impact on planning. Please advise Gulf Power as soon as possible any delay to the construction schedules due to permitting processes.

We appreciate your efforts to work with us regarding the startup of these emission control and research control systems. Please call me regarding any additional questions or concerns.

Sincerely,

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

cc: w/att: Trina Vielhauer, FDEP – Tallahassee Office
Jim Vick, Gulf Power Company
Wright, Terry, Gulf Power Company
John Dominey, Gulf Power Company
Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida
Mr. Richard Fancher, FDEP Northwest District Office, Pensacola, Florida



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)
– Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Gulf Power Company	
2. Site Name: Crist Electric Generating Plant	
3. Facility Identification Number: 0330045	
4. Facility Location...: Street Address or Other Locator: Pate Road (Off of 10 Mile Road) City: Pensacola County: Escambia Zip Code: 32520-0340	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: G. Dwain Waters		
2. Application Contact Mailing Address... Organization/Firm: Gulf Power Company Street Address: One Energy Place City: Pensacola State: Florida Zip Code: 32520-0328		
3. Application Contact Telephone Numbers... Telephone: (850) 444-6527 ext. Fax: (850) 444-6217		
4. Application Contact Email Address: gdwaters@southernco.com		

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	1-25-05
2. Project Number(s):	0330045-011-AC, 0330045-012-AC
3. PSD Number (if applicable):	

APPLICATION INFORMATION

4. Siting Number (if applicable):	
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APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

Air construction permit.

Air Operation Permit

Initial Title V air operation permit.

Title V air operation permit revision.

Title V air operation permit renewal.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

Air construction permit and Title V permit revision, incorporating the proposed project.

Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

The purpose of this application is to request a construction permit for several projects at Plant Crist located in Pensacola, Florida. These projects include: 1) Construction of a Selective Non-Catalytic Reduction (SNCR) System on Crist Unit 6 to support the facility wide NOx emission limitation as outlined under the Gulf-FDEP Ozone Reduction Agreement. 2) Re-construction of the damaged Unit 6 cooling tower from Hurricane Ivan. 3) Continuation of the previously issued biomass use permit for Units 4 and 5 and incorporation of long term use of biomass fuel in the Title V permit. 4) Construction of a Mercury Test Center on Unit 5.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
004	Unit 4 Electric Utility Boiler - 1096.7 MMBtu/hr		
005	Unit 5 Electric Utility Boiler - 1096.7 MMBtu/hr		
006	Unit 6 Electric Utility Boiler - 3704.8 MMBtu/hr		
012	Cooling Towers (3)		

Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

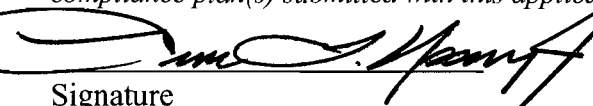
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: () - ext. Fax: () -
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i> _____ Signature _____ Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Gene L. Ussery, Jr.
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Gulf Power Company Street Address: One Energy Place City: Pensacola State: FL Zip Code: 32520-0100
4. Application Responsible Official Telephone Numbers... Telephone: (850) 444-6383 ext. Fax: (850) 444-6744
5. Application Responsible Official Email Address: GLUSSERY@southernco.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature <u>1-18-05</u> Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Gregory N. Terry Registration Number: 52786
2. Professional Engineer Mailing Address... Organization/Firm: Gulf Power Company Street Address: One Energy Place City: Pensacola State: FL Zip Code: 32520-0340
3. Professional Engineer Telephone Numbers... Telephone: (850) 429-2381 ext. Fax: (850) 429-2246
4. Professional Engineer Email Address: GNTERRY@southernco.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature: <u>Gregory N. Terry</u> Date: <u>1-14-2005</u> (seal) No. 52786 STATE OF FLORIDA PROFESSIONAL ENGINEER

* Attach any exception to certification statement.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 16 East (km) 478.27 North (km) 3381.36		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 30 33 58 Longitude (DD/MM/SS) 87 13 44	
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 49	6. Facility SIC(s): 4911
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: G. Dwain Waters
2. Facility Contact Mailing Address... Organization/Firm: Gulf Power Company Street Address: One Energy Place <div style="display: flex; justify-content: space-between; margin-top: 10px;"> City: Pensacola State: FL Zip Code: 32520-0329 </div>
3. Facility Contact Telephone Numbers: Telephone: (850) 444-6527 ext. Fax: (850) 444-6217
4. Facility Contact Email Address: gdwaters@southernco.com

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: <div style="display: flex; justify-content: space-between; margin-top: 10px;"> City: State: Zip Code: </div>
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
4. Facility Primary Responsible Official Email Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
No Change from previous Title V application		

FACILITY INFORMATION

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
NOx					
<p>7. Facility-Wide or Multi-Unit Emissions Cap Comment: Units 4, 5,6 & 7 are is subject to a NOx emissions cap of 0.20 lb/mmbtu (30 day rolling average) as outlined in the Gulf - FDEP Ozone Reduction Agreement.</p>					

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>06/22/2004</u>
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>06/22/2004</u>
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>06/22/2004</u>

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification: <input checked="" type="checkbox"/> Attached, Document ID: _____
3. Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: _____
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

FACILITY INFORMATION

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
 Attached, Document ID: _____ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only):
 Attached, Document ID: _____ Not Applicable (revision application)

2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):
 Attached, Document ID: _____
 Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan (Required for all initial/revision/renewal applications):
 Attached, Document ID: _____
Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):
 Attached, Document ID: _____
 Equipment/Activities On site but Not Required to be Individually Listed
 Not Applicable

5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :
 Attached, Document ID: _____ Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:
 Attached, Document ID: _____ Not Applicable

Additional Requirements Comment

Crist Electric Generating Plant
Unit 6 Cooling Tower Project

Due to damage sustained during Hurricane Ivan in September, 2004, Gulf Power has elected to re-build the Crist Unit 6 Cooling Tower. The structure will be re-constructed as a like kind replacement with the exception that the drift and evaluation percent of flow will be reduced from 2.4% to 2.1%. This change will slightly reduce volatile organic matter and particulate matter. Attached is a comparison of the new emission estimates for the Crist Unit 6 Cooling Tower and a replacement sheet for Plant Crist Emissions Unit #12 as previously submitted for Title V permitting.

Cooling Tower Information

	Cr 1-5	Crist 6	Crist 7	Total
GPM Design		150960	165000	
Evaporation Loss Design		2.10%	3.10%	
Drift Loss Design		0.0005%	0.20%	
Max Cu Ft/sec Flow (EIA 767)	426	310	344	
GPM	191444.4	139314	154593.6	
Cu Ft/sec Consumption (Eia 767)	0	7.3	9.9	
GPM	0	3280.62	4449.06	
Note: Consumption is Makeup less Blowdown				
Emission Calculations:				
Based on Circulating Flow & Apparent Factor				
Flow (GPM)	191444.4	150960	165000	
Flow (Annual Gallons)	1.00623E+11	7.9345E+10	86724000000	
PM10 Tons (=0.019 lb/1000 gal/2000 lb/lb))	955.9	753.8	823.9	2,533.6
Based on Design Drift & Drift Factor				
Drift & Evaporation % of Flow	2.1%	2.1%	3.3%	
Drift & Evap (GPM)	4021.3	3170.9	5445.0	
Drift (Annual Gallons)	2113589825	1666632819	2861892000	
PM 10 Tons (=1.7 lb/1000 gal/(2000 lb/ton))	1796.6	1416.6	2432.6	5,645.8
Based on Estimated Drift & Drift Factor				
Drift & Evaporation % of Flow	2.0%	0.005%	2.0%	
Drift (GPM)	3828.9	7.5	3300.0	
Drift (Annual Gallons)	2012463533	3967228.8	1734480000	
PM 10 Tons (=1.7 lb/1000 gal/(2000 lb/ton))	1710.6	3.4	1474.3	3,188.3
Based on Consumption & Drift Factor				
Drift (GPM)	unknown	3280.62	4449.06	
Drift (Annual Gallons)		1724293872	2338425936	
PM 10 Tons (=1.7 lb/1000 gal/(2000 lb/ton))		1465.6	1987.7	3,453.3
Maximum Annual PM10 Tons				
	1796.6	1465.6	2432.6	5,694.8
Based on Design Drift & Drift Factor				
Drift (Annual Gallons)	2113589825	1666632819	2861892000	
VOC's Tons (=6.0 lb/10 ⁶ gallons/(2000 lb/ton))	6.34	5.00	8.59	19.93
Based on Estimated Drift & Drift Factor				
Drift (Annual Gallons)	2012463533	3967228.8	1734480000	
VOC's Tons (=6.0 lb/10 ⁶ gallons/(2000 lb/ton))	6.04	0.01	5.20	11.25
Based on Consumption & Drift Factor				
Drift (Annual Gallons)	0	1724293872	2338425936	
VOC's Tons (=6.0 lb/10 ⁶ gallons/(2000 lb/ton))	0.00	5.17	7.02	12.19
Maximum Annual VOC Tons				
	6.34	5.17	8.59	20.10

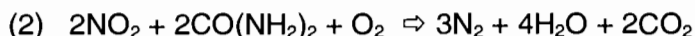
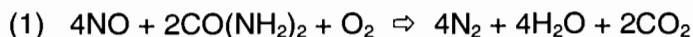
Cooling Tower Information

	Old Crist 6	New Crist 6
GPM Design	150960	150960
Evaporation Loss Design	2.20%	2.10%
Drift Loss Design	0.20%	0.0005%
Max Cu Ft/sec Flow (EIA 767)	310	310
GPM	139314	139314
Cu Ft/sec Consumption (Eia 767)	7.3	7.3
GPM	3280.62	3280.62
Note: Consumption is Makeup less Blowdown		
Emission Calculations:		
Based on Circulating Flow & Apparent Factor		
Flow (GPM)	150960	150960
Flow (Annual Gallons)	7.9345E+10	79344576000
PM10 Tons (=0.19 lb/1000 gal/(2000 lb/lb))	753.8	753.8
Based on Design Drift & Drift Factor		
Drift & Evaporation % of Flow	2.4%	2.1005%
Drift & Evap (GPM)	3623.0	3170.9
Drift (Annual Gallons)	1904269824	1666632819
PM 10 Tons (=1.7 lb/1000 gal/(2000 lb/ton))	1618.6	1416.6
Based on Estimated Drift & Drift Factor		
Drift & Evaporation % of Flow	2.0%	0.005%
Drift (GPM)	3019.2	7.5
Drift (Annual Gallons)	1586891520	3.967E+06
PM 10 Tons (=1.7 lb/1000 gal/(2000 lb/ton))	1348.9	3.4
Based on Consumption & Drift Factor		
Drift (GPM)	3280.62	3280.62
Drift (Annual Gallons)	1724293872	1724293872
PM 10 Tons (=1.7 lb/1000 gal/(2000 lb/ton))	1465.6	1465.6
Maximum Annual PM10 Tons		
	1618.6	1465.6
Based on Design Drift & Drift Factor		
Drift (Annual Gallons)	1904269824	1666632819
VOC's Tons (=6.0 lb/10 ⁶ gallons/(2000 lb/ton))	5.71	5.00
Based on Estimated Drift & Drift Factor		
Drift (Annual Gallons)	1586891520	3967228.8
VOC's Tons (=6.0 lb/10 ⁶ gallons/(2000 lb/ton))	4.76	0.01
Based on Consumption & Drift Factor		
Drift (Annual Gallons)	1724293872	1724293872
VOC's Tons (=6.0 lb/10 ⁶ gallons/(2000 lb/ton))	5.17	5.17
Maximum Annual VOC Tons		
	5.71	5.17

Plant Crist, Unit 6 Selective Non-Catalytic Reduction Retrofit System Description

Gulf Power Company is making application to install selective non-catalytic reduction, or "SNCR," technology on the Plant Crist Unit 6 boiler. The SNCR systems will be designed to provide approximately 25% removal of nitrogen oxides (NO_x) when operating.

SNCR is a post-combustion technology for reducing NO_x emissions from flue gases by chemical conversion. This chemical reaction requires the injection of urea into the hot flue gas stream in the upper regions of the furnace to reduce the nitrogen oxides to nitrogen, water, and small quantities of carbon dioxide. The reduction is normally expressed by the following equations:



N₂O is also a by-product of the SNCR process and is typically in the range of 10-20% of the NO_x reduced. Small amounts of CO emissions can also be expected from the process. There are no other known organic emissions from the SNCR process beyond CO and CO₂.

The SNCR process takes place in a temperature range between 1600°F to 2200°F, which normally occurs in the convective sections of the boiler. Urea is delivered and stored on-site at a concentration of ~40%. Prior to injection into the boiler, the urea is further diluted to a concentration somewhat less than 30%. Dilution is required to improve the mixing characteristics of the urea stream with the flue gas stream. The urea/water mixture is injected into the boiler via air atomizing wall lances.

The SNCR equipment to be installed at Crist Unit 6 is fabricated by Fuel Tech, Inc.

The SNCR system will be tuned to achieve the maximum level of NO_x reduction while limiting average ammonia slip across the duct to 5 ppmvd corrected to 3% O₂ (24 hour basis). Ammonia slip can react with small quantities of sulfur trioxide (SO₃) present in the flue gas to form ammonium bisulfate (NH₄HSO₄), which can foul and corrode downstream equipment (especially the air preheater).

The components of the SNCR system include a reagent unloading station, reagent storage tanks, reagent circulation module, reagent metering modules, reagent distribution modules, and air atomized injectors.

Below is a list of information previously requested by FDEP for the Crist Unit 6 SCR.

1. SNCR System Design Information:

	Crist 6
Heat Input, MBtu/hr	3704.8
Current NO _x , lbs/MBtu	0.578
SNCR Inlet NO _x , lbs/Mbtu	0.35
SNCR Inlet NO _x , lbs/hr	1296.68
NO _x Emissions (SNCR Outlet), lbs/MBtu	0.28
NO _x Emissions (SNCR Outlet), lbs/hr	1037.34
NH ₃ slip, ppmvd @ 3% O ₂	5
SNCR Design NO _x removal, %	25%
SNCR Guaranteed NO _x removal, %	20%

2. Flow Diagram:

See attachment flow diagram.

3. Narrative of the SNCR process:

See introduction

4. Reagent Circulation and Distribution Loop:

Urea is delivered and stored as a 40% aqueous solution that is maintained at a temperature of approximately 40° by circulating through the SNCR system piping loop and heating module. Using plant service water or other dilution water source, the metering module further dilutes the reagent to a predetermined concentration and precisely controls the flow of diluted reagent to distribution modules located near the boiler injection point. The distribution modules provide the final control of diluted reagent and atomizing/cooling (plant) air being delivered to each injector. The diluted reagent is injected into the boiler via wall-mounted air atomizing lances.

5. Plant Equipment Modifications:

The only anticipated change to the Unit 6 boiler is an adaptation of the boiler tube panels to accommodate the installation of wall-mounted injection lances. The Unit 6 SNCR will be designed with 6 wall-mounted injectors.

6. Peak Urea Injection Rate:

At peak load for Crist Unit 6, with 0.35 lbs./MBtu inlet NO_x and 20% reduction, urea injection would be 741 lb/hr on a dry basis. This translates to an ammonia flow of 333.8 lb/hr.

7. Ammonia Tank Sizes:

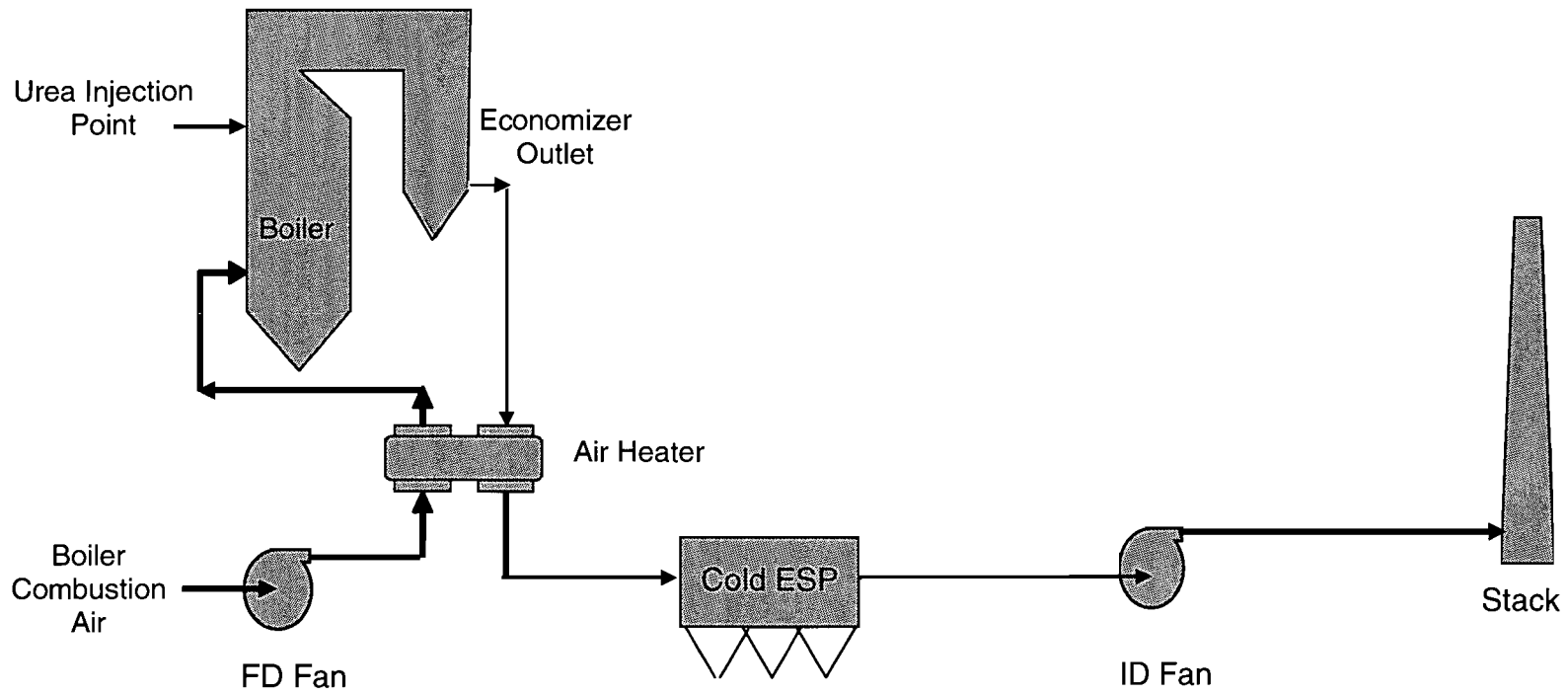
Liquid urea at a concentration of 40% will be stored in 1 tank with capacity to store 45,000 gallons of solution. This arrangement will provide a minimum of 7 days operating inventory.

8. Peak Ammonia Slip:

The SNCR is designed and guaranteed to have an ammonia slip concentration of 5 ppm by volume (dry basis) corrected to 3% O₂ as averaged over a 24 hour period in the duct cross sectional area for all boiler operating loads.

9. Construction Schedule:

- Mobilize Construction – June 27, 2005
- Equipment Deliveries – June 28, 2005 – July 1, 2005
- Pre-Outage Construction - June 28, 2005 – September 9, 2005
- Unit 6 Outage – September 10, 2005 – November 20, 2005
- Optimized System – May 1, 2006



Gulf Power Company
Plant Crist, Unit 6
SNCR Process Flow Diagram

Crist Electric Generating Plant
Biomass Fuels for Units 4 & 5

Gulf Power is making application to include the following fuel for use in at Plant Crist Units 4 and 5 as previously outlined in the 2004 Title V Renewal Application. Use of this fuel was not incorporated in the recently finalized Crist Title V permit. Gulf Power successfully demonstrated Crist 4 and 5 as units being "capable of accommodating" biomass fuels under a construction permit issued in 2003. Below is the information previously submitted in the 2004 Title V renewal application.

SCC Code: 10100903

Units: Tons Wood Burned

Description 1: External Combustion Boiler

Description 2: Electric Generation

Description 3: Wood/Bark Waste

Description 4: Wood-fired Boiler - Wet Wood ($\geq 20\%$ moisture)

Is this a valid segment? Yes

Segment Description: Biomass (wood, switchgrass, sawdust, and sander dust)

Segment comment: Permit allows up to 97.7 equivalent mmbtu/hr of biomass (wood, switchgrass, sawdust, and sander dust) with TPH limits for each biomass fuel.

Florida Department of
Environmental Protection

Memorandum

TO: Michael G. Cooke

THRU: *JVP* Trina Vielhauer
Jim Pennington *JVP*

FROM: Jonathan Holtom *J.H.*

DATE: March 1, 2005

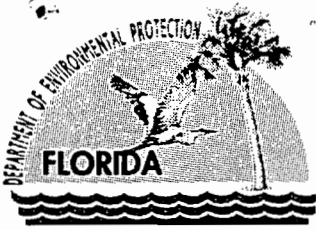
SUBJECT: Cooling Tower Replacement

Attached for approval and signature is an exemption (pursuant to Rule 62-4.040(1)(b), F.A.C) from the construction permitting requirements of Rule 62-210.300, F.A.C. for the replacement of the Unit 6 cooling tower at Gulf Power's Crist Generating Station. The previous cooling tower was damaged beyond repair during hurricane Ivan. Gulf Power had been waiting for a settlement commitment from their insurance company before making a final decision on the choice of the replacement unit. In order to meet the water discharge temperature differentials that are required by the NPDES permit, installation of the new cooling tower must be completed during April. Gulf Power has chosen to install a newer version of the same model that was destroyed, but have elected to include additional drift eliminators that were not installed on the old cooling tower. The addition of these drift eliminators will result in a decrease in particulate matter emissions from a potential of 1,465 tons per year down to an estimated 3.4 tons per year. This replacement project does not quite qualify for a generic emissions unit exemption, pursuant to Rule 62-210.300(3)(b), F.A.C., because the potential VOC emissions are just over the 5 ton per year cut-off at 5.17 tons per year. The cooling tower is not subject to 40 CFR 63, Subpart Q because chromium-based water treatment chemicals are not used. Because there are no applicable requirements, the three cooling towers at the Crist plant are included in the Title V permit as unregulated emissions units.

I recommend your approval and signature.

Attachments

/jh



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

March 2, 2005

CERTIFIED MAIL – Return Receipt Requested

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

Re: Crist Electric Generating Station
Conditional Exemption for Unit 6 Cooling Tower Replacement

Dear Mr. Ussery:

The Department is in the process of reviewing an air construction permit application which you recently submitted. Included in the application is a request to replace the cooling tower for Unit 6 that was damaged beyond repair during hurricane Ivan. Based on communications with Mr. Dwain Waters, we understand that there is some urgency associated with gaining the approval to reconstruct the damaged cooling tower in order to meet the required water discharge temperature differentials imposed by the NPDES permit. We also understand that the required temperature differentials are seasonal in nature. Because the seasonal temperature differential requirement changes during the spring season, the cooling tower replacement must be operational during the month of April. Based on the information submitted, the cooling tower will be replaced with an identical cooling tower, but will include additional drift eliminators that were not on the original unit. As a result, the particulate matter (PM) emissions will be reduced from a past potential of 1,465 tons per year to an estimated 3.4 tons per year. Potential VOC emissions will remain unchanged at an estimated 5.17 tons per year.

The existing facility is a “major source of air pollution” or “Title V Source” for criteria pollutants and hazardous air pollutant emissions pursuant to Rule 62-210.200, Florida Administrative Code (F.A.C.), Definitions. A renewal of the Title air operation permit became effective on January 1, 2005. Since the cooling tower replacement will result in such a significant decrease in actual PM emissions, the proposal is not subject to PSD new source review pursuant to Rule 62-212.400(5), F.A.C. Also, for PSD review consideration pursuant to Rule 62-212.400(6)(b), F.A.C., it is determined that the proposal is not considered as part of a phased project. Finally, there are no specific emission limiting standards pursuant to Rule 62-204.800 and Chapter 62-296, F.A.C.

Based on the above findings, the Department is granting a conditional exemption from the air construction permitting requirements of the Florida Department of Environmental Protection for the replacement of the cooling tower for Unit 6. The exemption is based on the premise that any air pollutants emitted from the proposed cooling will not be in significant quantities to contribute to air pollution problems in the state pursuant to Rule 62-4.040(1)(b), F.A.C.

The conditions of this exemption for the Unit 6 Cooling Tower are as follows:

1. The new cooling tower will be designed to meet at least the same specifications as the original cooling tower.
2. The design flow rate of the new cooling tower shall not exceed the old design flow rate of 150,960 GPM.
3. No chromium-based water treatment chemicals shall be used.

“More Protection, Less Process”

Printed on recycled paper.

4. The design of the old cooling tower shall be improved by the installation of additional drift eliminators in order to reduce the PM emissions to an estimated 3.4 tons per year.
5. The operation of this activity shall not cause or contribute to an objectionable odor.
6. If the conditions on which this exemption are based change, the operator shall notify the Department's Bureau of Air Regulation of the changes and request the exemption be amended.

This conditional exemption will take effect on the clerking date unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes (F.S.). The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed agency action may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 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 twenty-one days of receipt of this notice. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within twenty-one days of receipt of this notice. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within twenty-one days of receipt of that notice. 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 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 Department'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 how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; and, (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department'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 Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the request for conditional exemption have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

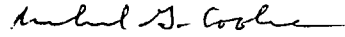
NOTICE OF APPEAL RIGHTS

Any party to this conditional exemption has the right to seek judicial review of it under Section 120.68, F.S., 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 thirty days after this conditional exemption is filed with the Clerk of the Department.

A copy of the conditional exemption and accompanying materials related to the proposed agency action are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Protection, Division of Air Resources Management, Suite 23, Magnolia Courtyard, 111 South Magnolia Drive, Tallahassee, Florida 32301, and at the Department's Northwest District Office, 160 Governmental Center, Pensacola, Florida 32501-5794.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



Michael G. Cooke, Director
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF CONDITIONAL EXEMPTION and all copies were sent by certified mail before the close of business on 3/3/05 to the person(s) listed:

Mr. Gene L. Ussery, Jr., Gulf Power Company

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this NOTICE OF CONDITIONAL EXEMPTION were sent by electronic mail on the same date to the person(s) listed:

Ms. Sandra Veazey, NWD
Mr. Andy Allen, NWD
Mr. G. Dwain Waters, Q.E.P., Gulf Power Company

Clerk Stamp
FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), F.S., with the designated agency Clerk, receipt of which is hereby acknowledged.


(Clerk) 3/3/05
(Date)

MGC/TLV/jh

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF RETURN ADDRESS
DO NOT WRITE ABOVE DOTTED LINE

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Gene L. Ussery
 V.P. Power Generation
 Gulf Power Company
 One Energy Place
 Pensacola, Florida 32520-0110

2. Article Number
(Transfer from service label)

7000 1670 0013 3109 8918

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
James Blakely
 B. Received by (Printed Name) C. Date of Delivery
 JAMES BLAKELY 03 07
 D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
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 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

U.S. Postal Service
CERTIFIED MAIL RECEIPT
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Mr. Gene L. Ussery
 V.P. Power Generation
 Gulf Power Company
 One Energy Place
 Pensacola, Florida 32520-0110

PS Form 3800, May 2000

See Reverse for Instructions

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1. Article Addressed to: Mr. Gene L. Ussery V.P. Power Generation Gulf Power Company One Energy Place Pensacola, Florida 32520-0110	B. Received by (Printed Name) <i>L. Jones</i>	C. Date of Delivery <i>2-25-05</i>
2. Article Number (Transfer from service label)	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
7000 2870 0000 7027 9959	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
PS Form 3811, August 2001	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	Domestic Return Receipt

102595-02-M-1540

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
7000 2870 0000 7027 9959	Mr. Gene L. Ussery, V.P. of Power Generation
Postage \$ Certified Fee Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required) Total Postage & Fees \$	Postmark Here
Sent To Mr. Gene L. Ussery, V.P. of Power Generation Street, Apt. No.; or PO Box No. One Energy Place City, State, ZIP+4 Pensacola, Florida 32520-0110	
PS Form 3800, May 2000	See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Gene L. Ussery
 V.P. Power Generation
 Gulf Power Company
 One Energy Place
 Pensacola, Florida 32520-0110

2. Article Number
 (Transfer from service label)

7000 167 0013 3110 2608

PS Form 3811, August 2000

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature *James Blakely* Agent Addressee

B. Received by (Printed Name) *JAMES BLAKELY* C. Date of Delivery *2 15 05*

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
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 Registered Return Receipt for Merchandise
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4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service
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Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		

7000 1670 0013 3110 2608

1

Se Mr. Gene L. Ussery
 St V.P. Power Generation
 Cr Gulf Power Company
 One Energy Place
 Pensacola, Florida 32520-0110

PS Form 3800, May 2000 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <i>X Jones</i> <div style="float: right;"> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee </div>
1. Article Addressed to: <div style="border: 1px solid black; padding: 5px;"> Mr. Gene L. Ussery V.P. Power Generation Gulf Power Company One Energy Place Pensacola, Florida 32520-0110 </div>	B. Received by (Printed Name) C. Date of Delivery
2. Article Number (Transfer from service label)	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
PS Form 3811, August 2001	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
Domestic Return Receipt	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes
7001 0320 0001 3692 2206	
102595-02-M-1540	

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Postage \$ _____ Certified Fee _____ Return Receipt Fee (Endorsement Required) _____ Restricted Delivery Fee (Endorsement Required) _____	Postmark Here
--	---------------

To

Sen	Mr. Gene L. Ussery
Street or P.O. Box	V.P. Power Generation
City	Gulf Power Company
	One Energy Place
	Pensacola, Florida 32520-0110

PS Form 3800, January 2001

See Reverse for Instructions

9022 269E T000 0220
 7001 0320 0001 3692 2206

Gulf Power Proposed Mercury Research Center (MerRC)

In March 2005, the U.S. EPA is scheduled to promulgate rules that will require utilities to significantly reduce their Hg emissions. Currently, there are no commercially available Hg control technologies with documented long term performance on coal flue gas. Because of the lack of experience, Hg chemistry in flue gas is not very well understood. However, research performed over the past couple of years has shown that pollution control technologies designed to control NO_x, SO₂, and PM can significantly affect overall Hg performance. In order to investigate these relationships, Gulf Power is planning a 5 MW equivalent slip-stream facility equipped with a complete system of flue gas cleanup technologies.

System Description

The proposed slip-stream facility will incorporate a Selective Catalytic Reduction (SCR) system, rotary air-preheater, Electrostatic Precipitator (ESP), baghouse (BH), and wet Flue Gas Desulphurization (wFGD). Each system will be designed with the appropriate level of functionality so that a large number of existing plants can be represented. Because of the complex interactions of Hg with various surfaces in flue gas, it is difficult to generate representative data for full scale installations at the pilot scale. However, the 5 MW scale is sufficiently large enough to provide the appropriate surface to volume ratios to gather representative data. Figure 1 shows a schematic for the proposed system.

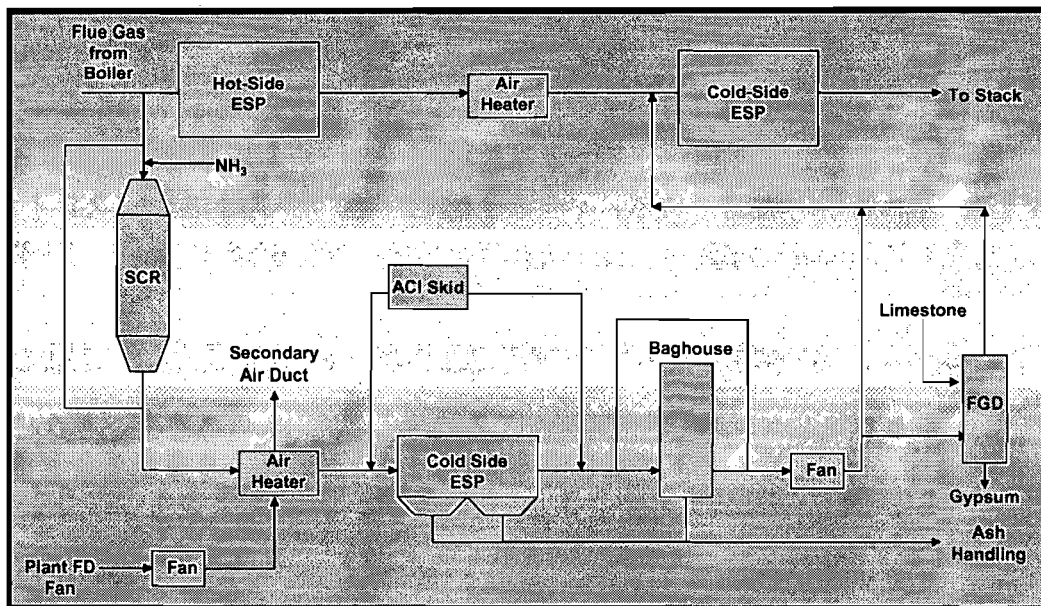


Figure 1: MerRC proposed schematic.

Host Facility

Because of its history with research facilities of this magnitude, Plant Crist Unit 5 was chosen as the host plant for the slip-stream facility. Crist Unit 5 is a wall fired PC boiler

burning low-sulfur bituminous coals and is equipped with hot and cold side ESPs arranged in series. The process gas supplied to the MerRC will be drawn from the inlet of the hot-ESP. The typical flue gas characteristics for this gas stream are presented in Table 1.

Table 1: Typical flue gas characteristics for MerRC inlet.

	Value	Units
Temperature	600	°F
Pressure	-6	inches H ₂ O
N ₂	80	%
CO ₂	15	%
O ₂	3	%
SO ₂	0.6-2.4	lb/mmBtu
NO _x	0.5-0.7	lb/mmBtu
Particulate	7	lb/mmBtu
Hg	6	lb/tBtu
MerRC System Flow	25,000	wacfm

Flue Gas Temperature Control

Because Hg chemistry has been shown to be temperature dependent, temperature control at the inlet of the research facility is crucial. This will be accomplished by using a combination of an economizer bypass line, providing ~ 900°F gas to the facility, or a flue gas heater. The heater will be sized to allow for a wide range of operating temperatures, up to and including 750°F. The heaters will be simple resistance type and will not introduce any additional compounds to the process gas. Typical heater characteristics are presented in Table 2.

Table 2: Flue gas heater parameters.

Heater Type	Electric Resistance heater	
Inlet Temp	600	°F
Max Outlet Temp	750	°F
Heat Input Requirement	3.5	mmBtu/hr
Power Requirement	600	kW

Selective Catalytic Reduction (SCR) system

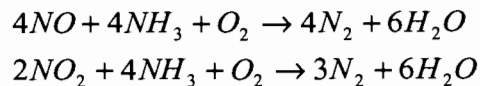
SCR for NO_x control has been widely incorporated throughout the world and is well understood. However, there is little known on the details of Hg chemistry in the SCR. The SCR designed for MerRC will resemble a typical full scale system installed at any number of plants. The scale of MerRC will allow for the use of full scale catalyst modules, with the cross section designed to achieve representative space velocities for the system. Typical SCR design points are shown in Table 3. The SCR will be equipped with 3 catalyst layers, which will allow for greater than 80% control of NO_x and a maximum pressure drop of 6 in. H₂O.

Table 3: Typical SCR system design points.

SCR System Inlet NO _x	0.7 lb/mmBtu
Expected SCR Performance	90%
Typical SCR Outlet	0.07 lb/mmBtu
Number of Catalyst Layers	3
Typical Maximum NH ₃ slip	5 ppm _{vd} @ 3% O ₂

The research facility will also incorporate a SCR reactor by-pass to allow for testing of alternate designs. Although research has shown that SCRs do not control Hg, data has shown it can significantly affect the chemistry of downstream devices, which could significantly change the performance of those systems. The ability to operate with and without SCR in service is a necessary requirement in order to investigate seasonal operation as well as alternate plant configurations.

In order to achieve NO_x reductions within the SCR, ammonia must be fed as a reagent to react with NO and NO₂ per the following equations.



Typically 95% of NO_x in the flue gas stream is NO, with the remainder NO₂. At these ratios, an ammonia flow rate of ~25 lb/hr to the SCR can be expected in order to achieve the stated NO_x reduction goals. At these rates, an ammonia slip of less than 5 ppm (0.065 lb/hr) is expected. However, during some research programs, this value could be exceeded for short periods of time.

Air Pre-heater (APH)

In order to mimic the time-temperature profile of a full scale system, the MerRC will incorporate a rotary type APH for flue gas cooling. The APH will cool the flue gas from ~700°F to 300°F before sending it to the downstream air pollution control equipment. In order to reject the heat transferred from the flue gas, a cooling air fan will be installed. The cooling air fan will provide ambient air supplied from the plant forced draft fan to the APH and, after heating, will force the air back into the plant secondary air duct in order to minimize the efficiency impacts of the MerRC. Table 5 presents pertinent APH design information.

Table 5: APH typical design criteria.

APH Type	Rotary (Lungstrom)
Heat load	5.5 mmBtu/hr
Flue Gas inlet Temp	700 °F
Air inlet Temp	72 °F
Flue Gas outlet	300 °F
Air Outlet	550 °F

Electrostatic Precipitator (ESP)

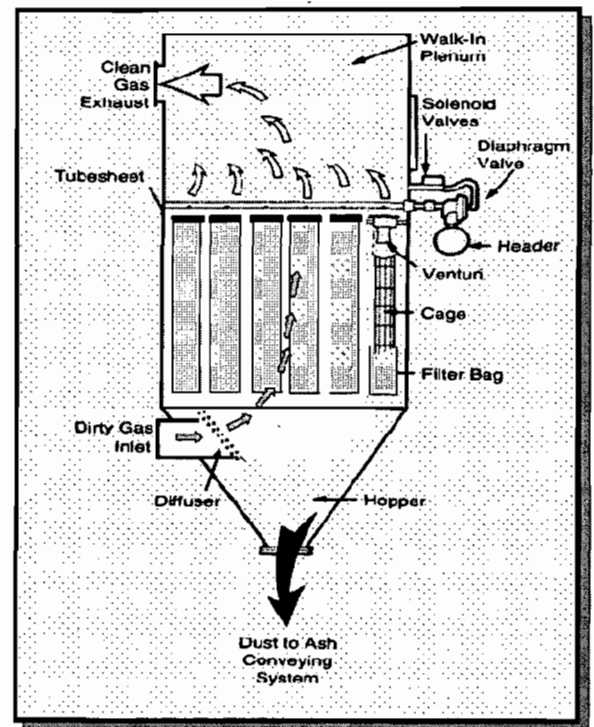
The utility industry has operated ESPs for several decades. However, in the future, more stringent particulate emission requirements will force operators to make incremental improvements in performance. Additionally, the co-benefit of Hg removal in these ESPs could play a significant role in achieving least cost compliance. The ESP installed in the MerRC will be designed as a single casing 4 field unit, able to achieve >99% removal efficiency of particulate matter. Typical design data are listed in Table 6.

Table 6: Typical ESP design data.

Number of fields	4
Field Length	5 ft
Field Height	12 ft
SCA (ft ² /1000acfm)	225
Efficiency	>99%

Baghouse

Currently, the most mature Hg control technology is TOXECON™. TOXECON™ is an EPRI patented technology that incorporates a high (air to cloth) ratio fabric filter downstream of an ESP, with activated carbon injection (ACI) between. The high ratio baghouse, or COHPAC baghouse, is designed to minimize conserve footprint while weighing increased pressure drop due to higher bag face velocities. There are only a handful of installations of this technology in the industry, and 2 of them are located at Alabama Power's Plant Gaston near Birmingham, AL. Southern Company has significantly contributed to the development, and would be able to continue this development at the MerRC. The baghouse will be designed to allow for multiple bag configurations, bag types, and inlet loadings so that critical parameters for long term performance of these systems can be investigated. Figure 2 shows a schematic for a typical COHPAC baghouse.



Activated Carbon Injection (ACI)

As stated above, the most mature Hg control technology is TOXECON (ACI into COHPAC baghouse). Significant work has been performed by Southern Company and others to investigate ACI into existing ESPs. Although results from these programs show promising Hg control results, there is concern that the additional solids loading to the ESP will degrade the particulate removal performance. In order to understand long term performance and BOP issues of both of these control concepts, the MerRC will

incorporate a carbon injection skid. The skid will be designed with enough variability to allow for both injection schemes. Typical injection rates for ACI into ESPs vary from 5-20 lbs Carbon/mmacf (5-20 lbs/hr) of flue gas, and for TOXECON from 0.5-2 lbs/mmacf (0.5-2 lbs/hr). As the art of ACI matures over time, the MerRC will also provide a testing ground for the latest innovation in sorbents. Assuming an annual capacity factor of 10% for ESP injection, you could expect ~7.5 tons of activated carbon, and ~0.5 tons of activated carbon for the TOXECON injection case.

Wet Flue-gas Desulphurization

Over the next decade, Southern Company will be installing a large number of FGD systems throughout its fleet, including some of Gulf Power's units. In order to achieve the lowest cost Hg compliance, it will be paramount that these systems be optimized for Hg removal efficiency. Tests have shown that wet FGD systems can efficiently capture oxidized Hg. However, little about Hg chemistry in the FGD is understood. Research to uncover the critical factors affecting these chemical processes is needed.

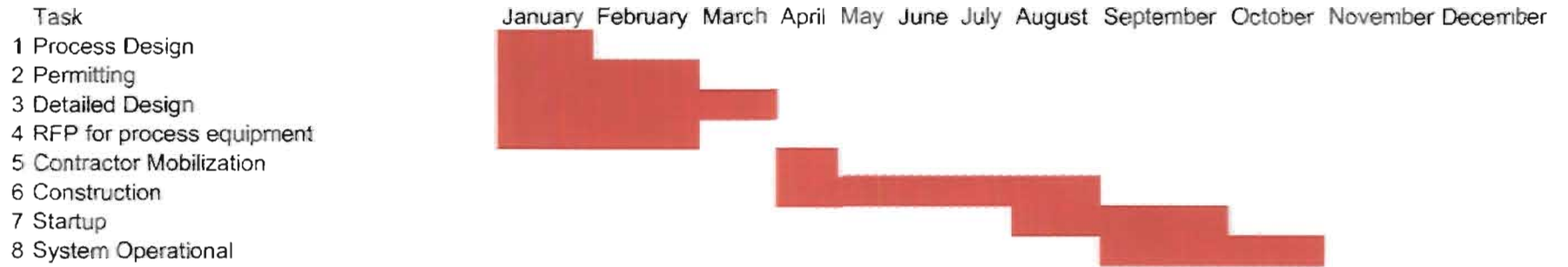
Southern Company currently owns a 1 MW scale pilot wet FGD system. This system will be incorporated into the MerRC to study the effects described above. The FGD will require a limestone feed for SO₂ control, and will produce a gypsum byproduct. Typical process flows are presented in Table 7. Applying an annual capacity factor of 20% to the FGD projects an annual gypsum production of ~45 tons.

Table 7: Typical stream flows for FGD pilot.

System Flow	3000 acfm @ 300°F
SO ₂ Concentration	1100 ppm _v
SO ₂ Feed (lb/hr)	24
Limestone Feed (lb/hr)	37.5
Gypsum Draw off (lb/hr)	51

Crist Mercury Research Center

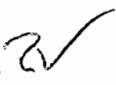
2005



Memorandum

Florida Department of Environmental Protection

TO: Joseph Kahn

THRU: Trina Vielhauer 
Jeff Koerner

FROM: Jonathan Holtom

DATE: August 9, 2006

SUBJECT: Project No. 0330045-014-AC
Final Construction Permit for Gulf Power Crist Electric Generating Plant
Unit 7 Cooling Tower Replacement

Attached for approval and signature is a Final construction permit for Gulf Power Company's Crist Electric Generating plant. This permitting project authorizes the installation of a new 14-cell cooling tower for use with Crist Unit 7 to replace the old 12-cell cooling tower that must be removed to make room for a new wet flue gas desulphurization (WFGD) scrubber system. This project does not authorize any increase in heat input to Unit 7.

The Public Notice requirements were met on July 19 by publishing in The Pensacola News Journal. No comments have been received from the public in response to this Public Notice, and no petitions were filed for an Administrative Hearing.

I recommend your approval and signature.

Attachments

/jh

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

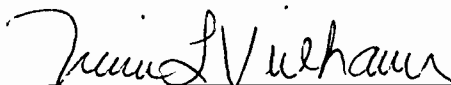
Ms. Penny M. Manuel, Vice President, Power Generation
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0100

DEP File No. 0330045-014-AC
Crist Electric Generating Plant
Escambia County

Enclosed is Final Permit Number 0330045-014-AC. This permit authorizes Gulf Power Company to construct a new 14-cell cooling tower for use with Crist Unit 7 to replace the old 12-cell cooling tower that must be removed to make room for a new wet flue gas desulphurization (WFGD) scrubber system. This project does not authorize any increase in heat input to Unit 7. This permit is issued pursuant to Chapter 403, Florida Statutes.

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 thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

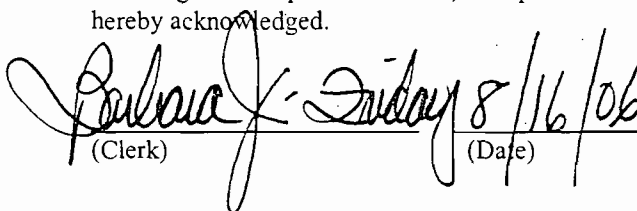
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit determination and the Final permit) was sent by certified mail (*) and copies were electronically mailed by Internet e-mail before the close of business on 8/16/06 to the person(s) listed:

Ms. Penny M. Manuel, Vice President, Power Generation, Gulf Power Company *
Mr. G. Dwain Waters, QEP, Gulf Power Company (GDWATERS@southernco.com)
Mr. Gregory N. Terry, P.E., Gulf Power Company (GNTERRY@southernco.com)
Mr. Kevin White, P.E., DEP-NWD (kevin.white@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk) 8/16/06
(Date)

FINAL DETERMINATION

Gulf Power Company
Crist Electric Generating Plant
DEP File No. 0330045-014-AC

The Department distributed a public notice package on July 13, 2006, to authorize the construction of a new cooling tower for unit 7 at the Gulf Power Crist Electric Generating Plant, which is located on Pate Road, off of 10 Mile Road on Governors Bayou, Escambia County. The Public Notice of Intent to Issue was published in The Pensacola News Journal on July 19, 2006.

COMMENTS/CHANGES

No comments were received from the public during the 14 (fourteen)-day public comment period, however, comments were received from the Permittee. The comments were not considered significant enough to reissue the Air Construction Permit and require another Public Notice; therefore, the Air Construction Permit was changed. Those comments, and minor changes, are addressed below.

A. Email from Mr. G. Dwain Waters dated July 31, 2005.

Comment 1. Regarding condition #3, the requirement to “operate and maintain to achieve a drift rate of no more than 0.0005% of the circulating water flow” as written will be impossible to certify. Gulf Power requests “operate and maintain” to be deleted from the condition.

Response 1. The Department agrees that it could be difficult to certify that the cooling tower is operating at a specified drift rate at any given time. However, the Department does not agree that it should be difficult to certify that the cooling tower will be maintained to meet the design specifications. We believe that proper maintenance will be specified and required to be documented by the manufacturer in order to receive a guaranteed drift rate. As a result of this comment, specific condition 3 is changed:

FROM:

3. Cooling Tower Design: The cooling tower shall be designed, operated and maintained to achieve a drift rate of no more than 0.0005% of the circulating water flow. [Application; Design]

TO:

3. Cooling Tower Design: The cooling tower shall be designed and maintained to achieve a drift rate of no more than 0.0005% of the circulating water flow. [Application; Design]

Comment 2. Regarding condition #4, Circulating Water Flow-meter, the condition should be deleted. Gulf Power doesn't believe there is a regulatory requirement to monitor water flow on a unit which should be considered an insignificant emissions source.

Response 2. Occasionally, it will be necessary to estimate annual emissions from this unit, which will require the circulating water flow rate. However, the circulating water flow rate can be determined indirectly in other ways and we will leave the method up to Gulf Power. As a result of this comment, specific condition 4 is changed:

FINAL DETERMINATION

Gulf Power Company
Crist Electric Generating Plant
DEP File No. 0330045-014-AC

FROM:

4. Circulating Water Flow-meter: The cooling tower shall be equipped with a circulating water flow-meter. [Rule 62-4.070, F.A.C.]

TO:

4. Circulating Water Flow Rate: Upon request, the applicant shall provide a means for determining the circulating water flow rate through the new cooling tower. [Rule 62-4.070, F.A.C.]

Comment 3. Regarding condition #6, Maintenance, the condition should be deleted. Gulf Power doesn't believe there is a regulatory requirement to formalize a maintenance program on a unit which should be considered an insignificant emissions source. Gulf Power has no such requirement in other permits containing cooling tower equipment.

Response 3. In consideration of comment number 1, above, specific condition 6 will be deleted.

- ~~6. Maintenance: A maintenance plan shall be implemented to assure that the drift elimination system on the cooling tower shall be maintained so as to minimize pluggage and to insure timely repair of broken sections of the drift eliminators. [Rule 62-4.070, F.A.C.]~~

CONCLUSION

The final action of the Department is to issue the final permit with the changes noted above.



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

PERMITTEE:

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

ARMS Permit No.	0330045-014-AC
Facility ID No.	0330045
SIC No.	4911
Expires:	December 31, 2007

Authorized Representative:

Penny Manuel
Vice President, Power Generation

PROJECT AND LOCATION

This permit authorizes the construction of a new 14-cell cooling tower for use with Crist Unit 7 to replace the old 12-cell cooling tower that must be removed to make room for a new wet flue gas desulphurization (WFGD) scrubber system. This project does not authorize any increase in heat input to Unit 7.

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

STATEMENT OF BASIS

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

APPENDICES

The following Appendix is attached as part of this permit.

Appendix GC Construction Permit General Conditions

Joseph Kahn, P.E., Acting Director
Division of Air Resource Management

SECTION II. ADMINISTRATIVE REQUIREMENTS

FACILITY DESCRIPTION

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

PROJECT DESCRIPTION

The Project consists of the construction and operation of a new cooling tower comprised of 14 cells, with a width of 105', a length of 367.5', a height of 68', includes drift eliminators rated at 0.0005%, and operates at a maximum brackish-water flow rate of 180,000 gallons per minute for all cells combined. Brackish water is sprayed through the tower where fan induced air flow causes evaporative cooling. Water vapor, saltwater droplets (drift) and salt particles are emitted. Drift emissions are controlled by drift eliminators.

REGULATORY CLASSIFICATION

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

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

PERMIT SCHEDULE

- 06-08-06: Date of Receipt of Permit Application
- 06-14-06: Application deemed complete
- 07-12-06: Intent issued
- 07-19-06: Notice published in the Pensacola News Journal

RELEVANT DOCUMENTS

The documents listed form the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Application received 06-08-06
- Technical Evaluation and Preliminary Determination dated 07-12-06

SECTION II. ADMINISTRATIVE REQUIREMENTS

GENERAL AND ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (DEP), at 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400. The phone number 850/488-0114 and the fax number is 850/921-9533.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications should be submitted to the FDEP Northwest District Office, 160 Governmental Center, Pensacola, Florida 32501-5794. The phone number is 850/595-8364 and the fax number is 850/595-8417.
3. Terminology: The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code.
4. General Conditions: The owner and operator are subject to, and shall operate under, the attached General Conditions listed in *Appendix GC* of this permit. General Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
5. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 & 62-210.900, F.A.C.]
6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) & 62-212.300(1)(a), F.A.C.]
8. Expiration: This air construction permit shall expire on December 31, 2007. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4) 62-4.080, and 62-4.210, F.A.C.]
9. Title V Permit: This permit authorizes the construction of the permitted emissions unit and initial operation to demonstrate that the stated design parameters were achieved. A Title V operation permit revision is required for continued operation of the permitted emissions unit. The Permittee shall submit an application for a permit revision at least ninety days prior to the expiration date of this air construction permit, but no later than 180 days after the emissions unit commences operation. [Rules 62-4.030 & 62-213.420, F.A.C.]

SECTION III - EMISSIONS UNITS SPECIFIC CONDITIONS

Cooling Tower (EU 014)

EMISSIONS UNITS

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

ID	Emission Unit Description
014	Mechanical Draft Cooling Tower with a maximum circulation rate of 180,000 GPM.

EQUIPMENT

1. Cooling Tower: The permittee is authorized to construct a new 14-cell mechanical draft cooling tower with the following nominal design characteristics: a circulating water flow rate of 180,000 gpm; drift eliminators; and, a drift rate of no more than 0.0005 percent of the circulating water flow. [Application; Design]

EMISSIONS AND PERFORMANCE REQUIREMENTS

2. Hours of Operation: The new cooling tower shall be allowed to operate 8,760 hours per year. [Rule 62-210.200 (PTE), F.A.C.; and, Applicant's requests in AC permit application received June 08, 2006.]
3. Cooling Tower Design: The cooling tower shall be designed and maintained to achieve a drift rate of no more than 0.0005% of the circulating water flow. [Application; Design]

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

4. Circulating Water Flow Rate: Upon request, the applicant shall provide a means for determining the circulating water flow rate through the new cooling tower. [Rule 62-4.070, F.A.C.]
5. Drift Rate: Within 60 days of commencing operation, the permittee shall certify that the cooling tower was constructed and installed so as to achieve the specified drift rate of no more than 0.0005 percent of the circulating water flow rate. [Rule 62-4.070, F.A.C.]

{Note: This emissions unit is not subject to a visible emissions limitation. Emissions from this emissions unit include water droplets, so visible emission testing is not possible.}

SECTION 4. APPENDIX GC
CONSTRUCTION PERMIT GENERAL CONDITIONS

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

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

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

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

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

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

SECTION 4. APPENDIX GC
CONSTRUCTION PERMIT GENERAL CONDITIONS

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

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

SENDER COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. <input checked="" type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input checked="" type="checkbox"/> Attach this card to the back of the mailpiece, <i>or</i> on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee <i>[Signature]</i></p> <p>B. Received by (Printed Name) <input type="checkbox"/> Agent <i>JAMES B. KELLY</i></p> <p>C. Date of Delivery <i>8-18-06</i></p>
<p>1. Article Addressed to:</p> <p>Ms. Penny M. Manuel, Vice President, Power Operations Gulf Power Company One Energy Place Pensacola, Florida 32520-0100</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p style="text-align: center;">7005 1160 0004 3034 4943</p>

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only, No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

Ms. Penny M. Manuel, V.P., Power Oper.

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To
Ms. Penny M. Manuel, V.P., Power Oper.
Street, Apt. No.,
or PO Box No. One Energy Place
City, State, ZIP+4
Pensacola, Florida 32520-0100

PS Form 3800, June 2002 See Reverse for Instructions

7005 1160 0004 3034 4943

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

JUL 24 2006

BUREAU OF AIR REGULATION

Certified Mail



July 21, 2006

Mr. Jonathan Holtom, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Mail Station # 5505
Tallahassee, Florida 32399-2400

Dear Mr.Holtom:

RE: CRIST ELECTRIC GENERATION FACILITY
DEP File No. 0330045-014-AC
Air Construction Permit for Cooling Tower - Public Notice Affidavit

Thanks for the quick response to Gulf Power's request for an air construction permit to build a new Cooling Tower for Unit 7 at Plant Crist. Enclosed is the proof of publication, i.e., newspaper affidavit regarding the Public Notice of Intent to Issue An Air Construction Permit originally sent to Gulf Power on July 17, 2005. The notice was published on July 19, 2006 in the Pensacola News Journal.

Please let me know if you have any questions regarding this matter and if you receive any public comments regarding our request.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Dwain Waters" with a stylized flourish at the end.

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

Cc: Jim Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Sandra Veazey, FDEP, Northwest District

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Bureau of Air Regulation
 Draft Air Permit No. 0330045-014-AC
 Gulf Power Company - Crist Electric Generating Plant
 Escambia County

Applicant: The applicant for this project is Gulf Power Company, One Energy Place, Pensacola, Florida 322520. The applicant's authorized representative is G. Dwain Waters, Q.E.P., Air Quality Programs Supervisor.

Facility Location: The applicant proposes to construct a new cooling tower for Unit 7 at the existing Crist Electric Generating Plant, which is located on Gate Road, off of 10 Mile Road on Governors Bayou in Pensacola, Escambia County, Florida.

Project: The applicant proposes to construct a new 14-cell cooling tower for Crist Unit 7. The new cooling tower has the potential to emit an average of 3.82 tpy of particulate matter. The existing 12-cell cooling tower for Unit 7 will need to be removed in order to make room for a new planned wet flue gas desulfurization (WFGD) scrubber system to comply with the future CAIR and CAMR regulations. The new cooling tower will be constructed on an area that is currently part of the cooling water intake canal. Brackish water with an average TDS value of 1,935 parts per million (as the cooling medium) and a design drift rate of 0.0005% of the circulating flow are proposed. It is expected that actual PM emissions will decrease as a result of this project due to the shutting down of the old, less efficient, cooling tower.

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 regarding this project. The Permitting Authority's physical address is 111 South Magnolia Drive, Tallahassee, Florida 32301. The Permitting Authority's mailing address is 2600 Blair Stone Road, Mail Station 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 and phone number listed above. A copy of the complete project file is also available at the Department of Environmental Protection's Northwest District Office at 160 Governmental Center, Pensacola, Florida 32501-5794 (Telephone: 850/595-8364).

Notice of Intent to Issue Air 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 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 fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. 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.

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. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (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 fourteen (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 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 how and when the petitioner received notice of the agency action or proposed action; (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; 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

Bureau of Air Regulation
Draft Air Permit No. 0330045-01
Gulf Power Company - Crist Electric Gen
Escambia County

Applicant: The applicant for this project is Gulf Power Company, 322520. The applicant's authorized representative is Dwain Waters, Q.E.P., Air Quality Programs Supervisor.

Facility Location: The applicant proposes to construct Unit 7 at the existing Crist Electric Generating Plant, which is located off of 10 Mile Road on Governors Bayou in Pensacola, Escambia County, Florida.

Project: The applicant proposes to construct a new Unit 7. The new cooling tower has the potential to emit particulate matter. The existing 12-cell cooling tower is being moved in order to make room for a new planned wet scrubber system to comply with the future CAA requirements. The new cooling tower will be constructed on an area cooling water intake canal. Brackish water with an iron content of 100 parts per million (as the cooling medium) and a design circulating flow are proposed. It is expected that actual emissions from this project due to the shutting down of the existing tower.

Permitting Authority: Applications for air construction in accordance with the provisions of Chapter 403 Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code proposed project is not exempt from air permitting requirements. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination. The Permitting Authority's physical address is: 111 Hassees, Florida 32301. The Permitting Authority's mailing address is: Stone Road, Mail Station 5505, Tallahassee, Florida 32301. Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for review during normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday, at address indicated above for the Permitting Authority project file includes the Draft Permit, the Technical Evaluation, the application, and the information submitted in support of the application. Confidential records under Section 403.111, F.S. Interim the Permitting Authority's project review engineer for a project review and phone number listed above. A copy of the project file is available at the Department of Environmental Protection at 160 Governmental Center, Pensacola, Florida 32501-8364).

Notice of Intent to Issue Air Permit: The Permitting Authority has provided reasonable assurance that the proposed project will not adversely impact air quality and that the proposed project complies with the appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, F.A.C. The Permitting Authority will issue a Final Permit if all conditions of the proposed Draft Permit unless a timely pre-hearing is filed under Sections 120.569 and 120.57, F.S. or a change of terms or conditions.

Comments: The Permitting Authority will accept written comments on the proposed Draft Permit for a period of fourteen (14) days from the date of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be subject to public inspection. If written comments received result in a change of terms or conditions, the Permitting Authority shall revise the Draft Permit, another Public Notice.

Petitions: A person whose substantial interests are affected by the Permitting Authority's decision may petition for an administrative hearing under Sections 120.569 and 120.57, F.S. The petition must contain the name and address of the petitioner, the Department of Environmental Protection, Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32301. Petitions filed by any persons other than those entitled to a hearing under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication or receipt of a written notice, whichever occurs first. However, any person who asked the Permitting Authority for a hearing may file a petition within fourteen (14) days of receipt of the date of publication. A petitioner shall mail a copy of the petition to the Permitting Authority at the time of filing a petition to file a petition within the appropriate time period. A petitioner's right to request an administrative hearing under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding is a party to it. Any subsequent intervention will be only at the discretion of the hearing officer upon the filing of a motion in compliance with Rule 28-106.301, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's decision is based must contain the following information: (a) The name of the agency affected and each agency's file or identification number; (b) The name, address and telephone number of the petitioner; (c) The telephone number of the petitioner's representative, if any; (d) The purpose of the petition; (e) How the petitioner's substantial rights will be affected by the proposed action; (f) A statement of how and when the petitioner received notice of the proposed action; (g) A statement of all disputed facts alleged, including the specific facts the petitioner contends require reversal or modification of the agency's proposed action; (h) A statement of the petitioner's proposed action; and (i) A statement of the relief sought, including the action the petitioner wishes the agency to take in response to the agency's proposed action. A petition that does not dispute the material facts on which the Permitting Authority's action is based shall state the dispute and otherwise shall contain the same information required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed

Published Daily-Pensacola, Escambia County, FL

PROOF OF PUBLICATION

State of Florida

County of Escambia:

Before the undersigned authority personally appeared KAY CHASTAIN who on oath, says that she is a personal representative of the Pensacola News Journal, a daily newspaper published in Escambia County, Florida; that the attached copy of advertisement, being a Legal in the matter of:

PUBLIC NOTICE OF INTENT

Was published in said newspaper in the issue(s) of:

JULY 19, 2006

Affiant further says that the said Pensacola News Journal is a newspaper published in said Escambia County, Florida, and that the said newspaper has heretofore been published in said Escambia County, Florida, and has been entered as second class matter at the Post Office in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this 19TH Day of JULY, 2006, by KAY CHASTAIN who is personally known to me.

Kay Chastain Affiant

Nikki E. Nichols Notary Public

NIKKI E. NICHOLS
Notary Public-State of FL
Comm. Exp. Aug. 01, 2009
Comm. No. DD 427341

Because the administrative hearing process is designed to formulate the 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.

July 19, 2006

Legal No. 69555

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

JUN 08 2006

BUREAU OF AIR REGULATION



Hand Delivery

June 7, 2006

Jeff Koerner, P.E.
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Koerner:

RE: CRIST ELECTRIC GENERATING PLANT
UNIT 7 COOLING TOWER REPLACEMENT PROJECT
FACILITY IDENTIFICATION No: 0330045

The purpose of this correspondence is to request an air construction permit for the relocation of the Crist Unit 7 Cooling Tower. Gulf Power is in the process of designing a Wet Flue Gas Desulphurization (WFGD) scrubber system at Plant Crist to comply with future CAIR and CAMR regulation. The conceptual plot plan reveals that the present Unit 7 Cooling tower must be removed to accommodate the installation of the new scrubber system. The new proposed tower will be more efficient and will reduce particulate emissions at the facility. The Crist scrubber project must be completed before 2010 to comply with CAIR & CAMR, thus we are requesting a fast track review and issuance of the construction permit for the Crist 7 Cooling Tower in July, 2006 so the transition will not impact the scrubber project completion date.

Please find attached an original and three copies of the air construction permit application for the Crist Unit 7 Cooling Tower Relocation Project.

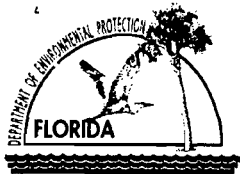
If you have any questions regarding the Crist Unit 7 Cooling Tower Relocation Project or the protocol development for the Crist scrubber project, please call me at (850) 444.6527.

Sincerely,

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

Mr. Jeff Koerner, P.E.
Crist Unit 7 Cooling Tower Replacement Project
June 7, 2006
Page 2

cc: w/att: Jim Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Jay Weston, Gulf Power Company
David Hollinger, Southern Company
Angela Morrison, Hopping, Green & Sams
Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida



Department of Environmental Protection

RECEIVE

JUN 08 2006

BUREAU OF AIR REGULATION

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for any air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial/revise/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Gulf Power Company	
2. Site Name: Crist Electric Generating Plant	
3. Facility Identification Number: 0330045	
4. Facility Location... Street Address or Other Locator: Pate Road (Off of 10 Mile Road) City: Pensacola County: Escambia Zip Code: 32520	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: G. Dwain Waters	
2. Application Contact Mailing Address... Organization/Firm: Gulf Power Street Address: One Energy Place City: Pensacola State: FL Zip Code: 32520-0329	
3. Application Contact Telephone Numbers... Telephone: (850) 444 - 6527 ext. Fax: (850) 444 - 6217	
4. Application Contact Email Address: gdwaters@southernco.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 6-8-06	3. PSD Number (if applicable):
2. Project Number(s): 0330045-014-AC	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

APPLICATION INFORMATION

The purpose of this application is to request a construction permit for the relocation of the Crist Unit 7 Cooling Tower. Gulf Power is in the process of designing a Wet Flue Gas Desulphurization (WFGD) scrubber system at Plant Crist to comply with future CAIR and CAMR regulation. The conceptual design plot plan reveals that the present Unit 7 Cooling Tower must be removed to accommodate the installation of the new scrubber system. A new more efficient Unit 7 Cooling Tower is being proposed as a replacement. The proposed replacement tower will be slightly larger (12 to 14 cells) and will include a drift elimination system to reduce particulate emissions. With the new tower design capability there will be a reduction of actual to potential PM and PM-10 emissions of approximately 8980 and 449 tons per year, respectively. Crist Unit 7 is projected to experience a heat rate improvement of less than 1% during the summer months due to the more efficient thermal system but this slight change in heat rate will not meaningfully impact the plant dispatch or change the load capability of the unit. The basic design of the cooling system for Crist Unit 7 will remain the same as a closed loop system. The new tower is a standard forced draft design available in today's market. Site preparation will begin in June, 2006. Construction is projected to begin in July, 2006 with startup earmarked for April 15, 2007.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
012	Cooling Tower (3)		

Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

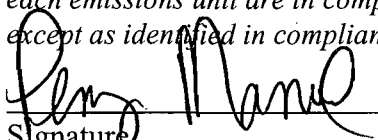
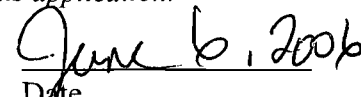
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: () - ext. Fax: () -
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i> _____ Signature Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Penny M. Manuel
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Gulf Power Company Street Address: One Energy Place City: Pensacola State: Florida Zip Code: 32520-0100
4. Application Responsible Official Telephone Numbers... Telephone: (850) 444 - 6383 ext. Fax: (850) 444 - 6744
5. Application Responsible Official Email Address: PMMANUEL@southernco.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature  Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Registration Number: Gregory N. Terry
2. Professional Engineer Mailing Address... Organization/Firm: Gulf Power Company Street Address: One Energy Place City: Pensacola State: Florida Zip Code: 32520-0340
3. Professional Engineer Telephone Numbers... Telephone: (850) 429 - 2381 ext. Fax: (850) 429 - 2246
4. Professional Engineer Email Address: <u>GNTERRY@southernco.com</u>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> <div style="display: flex; justify-content: space-between;"> <div style="width: 40%;"> <p><i>Gregory N. Terry</i></p> <p>_____ Signature (seal)</p> </div> <div style="width: 40%; text-align: right;"> <p><u>6-2-2006</u> Date</p> </div> </div>

*Attach any exception to certification statement.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 16 East (km) 478.27 North (km) 3381.36		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 30 33 58 Longitude (DD/MM/SS) 87 13 44	
3. Governmental Facility Code: O	4. Facility Status Code: A	5. Facility Major Group SIC Code: 49	6. Facility SIC(s): 4911
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: G. Dwain Waters
2. Facility Contact Mailing Address... Organization/Firm : Gulf Power Company Street Address: One Energy Place City: Pensacola State: Florida Zip Code: 32520-0329
3. Facility Contact Telephone Numbers: Telephone: (850) 444 - 6527 ext. Fax: (850) 444 – 6217
4. Facility Contact Email Address: gdwaters@southernco.com

Facility Primary Responsible Official

Complete if an “application responsible official” is identified in Section I. that is not the facility “primary responsible official.”

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
4. Facility Primary Responsible Official Email Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
No change from Previous Title V application.		

FACILITY INFORMATION

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
NOx					Agreement

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

Plant Crist has a facility wide NOx Emissions Rate limit per the Gulf – FDEP Ozone Agreement in 2002. The NOx Emissions Cap does not affect this construction application.

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <u>Crist Plot Plan</u> <input type="checkbox"/> Previously Submitted, Date: _____
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>06/22/2004</u>
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>06/22/2004</u>

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input checked="" type="checkbox"/> Attached, Document ID: <u>Crist 7 Tower</u>
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: <u>Crist Rule</u>
4. List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

FACILITY INFORMATION

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
 Attached, Document ID: _____ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only):
 Attached, Document ID: _____ Not Applicable (revision application)
2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):
 Attached, Document ID: _____
 Not Applicable (revision application with no change in applicable requirements)
3. Compliance Report and Plan (Required for all initial/revision/renewal applications):
 Attached, Document ID: _____
Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):
 Attached, Document ID: _____
 Equipment/Activities On site but Not Required to be Individually Listed
 Not Applicable
5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :
 Attached, Document ID: _____ Not Applicable
6. Requested Changes to Current Title V Air Operation Permit:
 Attached, Document ID: _____ Not Applicable

Additional Requirements Comment

EMISSIONS UNIT INFORMATION

Section [1] of [1]

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [1] of [1]

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section: Crist Unit 7 Cooling Tower is an unregulated emissions unit with possible particulate emissions.

3. Emissions Unit Identification Number: 012

4. Emissions Unit Status Code: C	5. Commence Construction Date: 07/01/2006	6. Initial Startup Date: 04/15/2007	7. Emissions Unit Major Group SIC Code: 49	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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9. Package Unit: NA
Manufacturer:

Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment: Unit is an unregulated emissions unit.

EMISSIONS UNIT INFORMATION

Section [1] of [1]

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:
Drift Eliminators rated at .0005%

2. Control Device or Method Code(s) : 152: Mist Eliminator

EMISSIONS UNIT INFORMATION

Section [1] of [1]

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: 180000 Gallons Per Minute
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8760 hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

Section [1] of [1]

C. EMISSION POINT (STACK/VENT) INFORMATION
 (Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: Cooling Tower		2. Emission Point Type Code: 4: No True Emission Point	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: F: No Stack	6. Stack Height: Feet	7. Exit Diameter: Feet	
8. Exit Temperature: 115 °F	9. Actual Volumetric Flow Rate: Acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: Dscfm		12. Nonstack Emission Point Height: 68 Feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: Temperature in item #8 is estimated based on design and wet bulb calculations for mid-summer.			

EMISSIONS UNIT INFORMATION

Section [1] of [1]

D. SEGMENT (PROCESS/FUEL) INFORMATION**Segment Description and Rate:** Segment 1 of 1

1. Segment Description (Process/Fuel Type): Cooling Tower		
2. Source Classification Code (SCC): 3-90-900-04		3. SCC Units: Million Gallons Cooling Water Throughput
4. Maximum Hourly Rate: 10.8	5. Maximum Annual Rate: 94608	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: Non-regulated emissions unit.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

EMISSIONS UNIT INFORMATION

Section [1] of [1]

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM			NS
PM 10			NS

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 6.62 lb/hour 29 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 6.62 lbs/hr Reference: AP-42, Section 13.4		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $(180,000 \text{ gal/min}) * (.0005 \text{ gal/drift/100 gal flow}) * (14,700 \text{ lb PM/Million lb/water}) * (8.345 \text{ lb/gal water}) * 60 \text{ min/hr} = 6.62 \text{ lb/hr}$ $(6.62 \text{ lb/hr}) * (8760 \text{ Hr/Yr}) * (1\text{ton} / 2000 \text{ lb}) = 29.00 \text{ tons/yr} *$ * Total PM estimated using maximum daily TDS data.			
11. Potential, Fugitive, and Actual Emissions Comment: Emissions are based on maximum TDS measured at plant intake water.			

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM 10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.33 lb/hour 1.45 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.33 lb/hr Reference: AP-42 and Greystone Environmental Consultants Abstract No. 216		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): 1.45 tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Total PM = (180,000 gall/min) * (.0005 gal/drift/100 gal flow) * (14,700 lb PM/Million lb/water) * (8.345 lb/gal water) * 60 min/hr = 6.62 lb/hr Based on Abstract “ Calculating Realistic PM 10 Emissions from Cooling Tower” by Joel Reisman and Gordon Fribie the PM-10 fraction is less than 5% at TDS levels greater than 12000 ppm. Thus; PM10 = 6.62 lb/hr * .05 = 0.33 lb/hr PM 10 Annual = (0.33 lb/hr) * (8760 Hr/Yr) * (1ton /2000 lb) = 1.45 tons/yr			
11. Potential, Fugitive, and Actual Emissions Comment: Based on Abstract “ Calculating Realistic PM 10 Emissions from Cooling Tower” by Joel Reisman and Gordon Fribie the PM-10 fraction is less than 5% at TDS levels greater than 12000 ppm.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	

6. Allowable Emissions Comment (Description of Operating Method):
This unit is an unregulated emissions unit.

EMISSIONS UNIT INFORMATION

Section [1] of [1]

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation __ of __

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation __ of __

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment: This is an unregulated emissions unit.	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: This is an unregulated emissions unit.	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>06/22/2004</u>
2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>06/22/2004</u>
3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>06/22/2004</u>
4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>06/22/2004</u> <input type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> To be Submitted, Date (if known): <u>04/15/2007</u> Test Date(s)/Pollutant(s) Tested: <u>Permittee to submit certification of drift elimination by contractor.</u> <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [1] of [1]

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(4)(d), F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Not Applicable

ATTACHMENT: CRIST RULE

FDEP Rule	GULF POWER - CRIST FACILITY FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
<p>^aThis list includes only those applicable requirements typically associated with an electric power plant. For example, NSPS Subpart O for sewage treatment plants has not been included. If rules other than those listed herein apply to your source, they should be included in your source's application even if they are not listed below.</p> <p>^bPlease refer to HGSS's June 6, 1995 memorandum explaining how this list was developed and how applicable requirements should be addressed in an application.</p>						
Chapter 62-4 Permits						
62-4.030	General Prohibition.	0330045	✓		State Only	Facility
62-4.040(1)	Exemptions	0330045	✓		State Only	Facility
62-4.100	Suspension and Revocation.	0330045	✓		State Only	Facility
62-4.130	Plant Operation - Problems.	0330045	✓		State Only	Facility
Chapter 62-204 State Implementation Plan						
62-204.800 (11)	Adoption of 40 CFR 70, Federal Title V Rule	0330045	✓		State only.	Facility
62-204.800 (19)	Adoption of 40 CFR 82, Stratospheric Ozone	0330045	✓		State only.	Facility
Chapter 62-210 Stationary Sources - General Requirements						
62-210.300	Permits Required.					
	(2) Air Operation Permits. (Except (b))	0330045	✓			Facility
	(3)(a) Exemptions - #1-29.	0330045	✓			Facility
	(3)(b) Temporary Exemptions.	0330045	✓			Facility
62-210.300	(5) Notification of Startup. The owners or operator of any emissions unit or facility which has a valid air operation permit which has been shut down more than one year, shall notify the Department in writing of the intent to start up such emissions unit or facility, a minimum of 60 days prior to the intended startup date.	0330045	✓		May apply in the future.	Facility
	(a) The notification shall include information as to the startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.	0330045	✓		May apply in the future.	Facility
	(b) If, due to an emergency, a startup date is not known 60 days	0330045	✓		May apply in the future.	Facility

FDEP Rule	GULF POWER - CRIST FACILITY FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
	prior thereto, the owner shall notify the Department as soon as possible after the date of such startup is ascertained.					
62-210.370	Reports.					
	(3) Annual Operating Report for Air Pollutant Emitting Facility.	0330045	✓			Facility
62-210.900	Forms and Instructions.	0330045	✓			Facility
	(5) Annual Operating Reports	0330045	✓			Facility
Chapter 62-213 Operation Permits for Major Sources of Air Pollution						
62-213.205	Annual Emissions Fee.	0330045	✓			Facility
62-213.400	Permits and Permit Revisions Required.	0330045	✓			Facility
62-213.410	Changes Without Permit Revision.	0330045	✓			Facility
62-213.415	Trading of Emissions Within a Source.	0330045	✓		May apply in the future.	Facility
62-213.460	Permit Shield.	0330045	✓			Facility
Chapter 62-252 Gasoline Vapor Control						
62-252.300	Gasoline Dispensing Facilities - Stage I Vapor Recovery.					
	(2) Prohibition.	0330045				Facility
	(3) Control Technology Requirements.	0330045				Facility
	(4) Compliance Schedule.	0330045			State Only	Facility
62-252.400	Gasoline Dispensing Facilities - Stage II Vapor Recovery.					
	(2) Prohibition.	0330045			State Only	Facility
	(3) Control Technology Requirements.	0330045			State Only	Facility
	(4) Compliance Schedules.	0330045			State Only	Facility
	(5) Testing.	0330045			State Only	Facility

FDEP Rule	GULF POWER - CRIST FACILITY FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
	(6) Recordkeeping.	0330045			State Only	Facility
	(7) System Maintenance.	0330045			State Only	Facility
62-252.400	(8) Training.	0330045			State Only	Facility
62-252.500	Gasoline Tanker Trucks.					
	(2) Prohibitions.	0330045			State Only	Facility
	(3) Leak Testing.	0330045			State Only	Facility
Chapter 62-256 Open Burning and Frost Protection Fires						
62-256.300	Prohibitions.	0330045	✓		State Only	Facility
62-256.450	Burning for Cold or Frost Protection.	0330045			State Only	Facility
62-256.500	Land Clearing.	0330045	✓		State Only	Facility
62-256.600	Industrial, Commercial, Municipal, and Research Open Burning.	0330045	✓		State Only	Facility
62-256.700	Open Burning Allowed.	0330045	✓		State Only	Facility
Chapter 62-257 Asbestos Removal						
62-257.301	Notification Procedure and Fee.	0330045	✓		State Only	Facility
62-257.400	Fee Schedule.	0330045	✓		State Only	Facility
62-257.900	Form.	0330045	✓		State Only	Facility
Chapter 62-281 Motor Vehicle Air Conditioning Refrigerant Recovery and Recycling.						
62-281.300	Applicability.	0330045			State Only	Facility
62-281.400	Compliance Requirements.	0330045			State Only	Facility
62-281.500	Establishment Certification.					
	(1) Initial Certification.	0330045			State Only	Facility
	(2) Renewal Certification.	0330045			State Only	Facility

FDEP Rule	GULF POWER - CRIST FACILITY FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
	(3) Fees.	0330045			State Only	Facility
	(4) Certificate of Compliance.	0330045			State Only	Facility
62-281.600	Training Requirements.	0330045			State Only	Facility
62-281.700	Equipment Certification.	0330045			State Only	Facility
62-281.900	Forms.	0330045			State Only	Facility
Chapter 62-296 Stationary Sources -- Emission Standards						
62-296.320	General Pollutant Emission Limiting Standards.					
	(1) Volatile organic compounds emissions or organic solvents emissions.	0330045		-		Facility
	(2) Objectionable Odor Prohibited.	0330045	✓			Facility
	(3) Open Burning.	0330045	✓		State Only	Facility
	(4)(b) General Visible Emissions Standard.	0330045	✓			Facility
	(4)(c) Unconfined Emissions of Particulate Matter.	0330045	✓			Facility

EPA Rule	GULF POWER - CRIST FACILITY EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
<p>^aThis list includes only those applicable requirements typically associated with an electric power plant. For example, NSPS Subpart O for sewage treatment plants has not been included. If rules other than those listed herein apply to your source, they should be included in your source's application even if they are not listed below.</p> <p>^bPlease refer to HGSS's June 6, 1995 memorandum explaining how this list was developed and how applicable requirements should be addressed in an application.</p>						
Part 61 - EPA Regulations on National Emission Standards for Hazardous Air Pollutants						
Subpart A - General Provisions						
61.05	Prohibited Activities.	0330045	✓			Facility
61.09	Notification of Startup.	0330045				Facility
61.10	Source Reporting and Request fro Waiver of Compliance.	0330045				Facility
61.11	Waiver of Compliance.	0330045				Facility
61.12 (b)	Compliance with Standards and Maintenance Requirements.	0330045	✓			Facility
61.13	Emission Tests and Waiver of Emission Tests.	0330045				Facility
61.14	Monitoring Requirements.	0330445				Facility
61.19	Circumvention.	0330045				Facility
Subpart M — National Emission Standards for Asbestos		0330045	✓			Facility
Appendix C to Part 61 — Quality Assurance Procedures		0330045	✓			Facility
EPA Part 82 - Protection Of Stratospheric Ozone						
Subpart B - Servicing of Motor Vehicle Air Conditioners						
82.34	Prohibitions.	0330045	✓			Facility
82.36	Approved refrigerant recycling equipment.	0330045	✓			Facility
82.38	Approved independent standards testing organizations.	0330045	✓			Facility
82.40	Technician training and certification.	0330045	✓			Facility
82.42	Certification, recordkeeping and public notification requirements.	0330045	✓			Facility

EPA Rule	GULF POWER - CRIST FACILITY EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
Subpart F - Recycling and Emissions Reduction						
82.154	Prohibitions.	0330045	✓			Facility
82.156	Required practice.	0330045	✓			Facility
82.158	Standards for recycling and recovery equipment.	0330045	✓			Facility
82.160	Approved equipment testing organizations.	0330045	✓			Facility
82.161	Technician certification.	0330045	✓			Facility
82.162	Certification by owners of recovery and recycling equipment.	0330045	✓			Facility
82.164	Reclaimer certification.	0330045	✓			Facility
82.166 (k) (m)	Reporting and recordkeeping requirements for owners/operators.	0330045	✓			Facility
40 CFR 279.72	Used Oil Regulations	0330045	✓		Facility burns on-spec used oil.	Facility

Title V Core List

Effective: 03/01/02

[**Note:** The Title V Core List is meant to simplify the completion of the "List of Applicable Regulations" for DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced in its entirety, or with specific exceptions. The Department may periodically update the Title V Core List.]

Federal: (description)

40 CFR 61, Subpart M: NESHAP for Asbestos.

40 CFR 82: Protection of Stratospheric Ozone.

40 CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).

40 CFR 82, Subpart F: Recycling and Emissions Reduction.

State: (description)

CHAPTER 62-4, F.A.C.: PERMITS, effective 06-01-01

62-4.030, F.A.C.: General Prohibition.

62-4.040, F.A.C.: Exemptions.

62-4.050, F.A.C.: Procedure to Obtain Permits; Application.

62-4.060, F.A.C.: Consultation.

62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.

62-4.080, F.A.C.: Modification of Permit Conditions.

62-4.090, F.A.C.: Renewals.

62-4.100, F.A.C.: Suspension and Revocation.

62-4.110, F.A.C.: Financial Responsibility.

62-4.120, F.A.C.: Transfer of Permits.

62-4.130, F.A.C.: Plant Operation - Problems.

62-4.150, F.A.C.: Review.

62-4.160, F.A.C.: Permit Conditions.

62-4.210, F.A.C.: Construction Permits.

62-4.220, F.A.C.: Operation Permit for New Sources.

CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 06-21-01

62-210.300, F.A.C.: Permits Required.

62-210.300(1), F.A.C.: Air Construction Permits.

62-210.300(2), F.A.C.: Air Operation Permits.

62-210.300(3), F.A.C.: Exemptions.

62-210.300(5), F.A.C.: Notification of Startup.

62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.300(7), F.A.C.: Transfer of Air Permits.

Title V Core List

Effective: 03/01/02

62-210.350, F.A.C.: Public Notice and Comment.
62-210.350(1), F.A.C.: Public Notice of Proposed Agency Action.
62-210.350(2), F.A.C.: Additional Public Notice Requirements for Emissions Units Subject to Prevention of Significant Deterioration or Nonattainment-Area Preconstruction Review.
62-210.350(3), F.A.C.: Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources.

62-210.360, F.A.C.: Administrative Permit Corrections.
62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-210.400, F.A.C.: Emission Estimates.
62-210.650, F.A.C.: Circumvention.
62-210.700, F.A.C.: Excess Emissions.

62-210.900, F.A.C.: Forms and Instructions.
62-210.900(1), F.A.C.: Application for Air Permit – Title V Source, Form and Instructions.
62-210.900(5), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.
62-210.900(7), F.A.C.: Application for Transfer of Air Permit – Title V and Non-Title V Source.

CHAPTER 62-212, F.A.C.: STATIONARY SOURCES - PRECONSTRUCTION REVIEW, effective 08-17-00

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 04-16-01

62-213.205, F.A.C.: Annual Emissions Fee.
62-213.400, F.A.C.: Permits and Permit Revisions Required.
62-213.410, F.A.C.: Changes Without Permit Revision.
62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.
62-213.415, F.A.C.: Trading of Emissions Within a Source.
62-213.420, F.A.C.: Permit Applications.
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.
62-213.440, F.A.C.: Permit Content.
62-213.450, F.A.C.: Permit Review by EPA and Affected States
62-213.460, F.A.C.: Permit Shield.

62-213.900, F.A.C.: Forms and Instructions.
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form.
62-213.900(7), F.A.C.: Statement of Compliance Form.

Title V Core List

Effective: 03/01/02

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS, effective 03-02-99

62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter.

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.

CHAPTER 62-297, F.A.C.: STATIONARY SOURCES - EMISSIONS MONITORING, effective 03-02-99

62-297.310, F.A.C.: General Test Requirements.

62-297.330, F.A.C.: Applicable Test Procedures.

62-297.340, F.A.C.: Frequency of Compliance Tests.

62-297.345, F.A.C.: Stack Sampling Facilities Provided by the Owner of an Emissions Unit.

62-297.350, F.A.C.: Determination of Process Variables.

62-297.570, F.A.C.: Test Report.

62-297.620, F.A.C.: Exceptions and Approval of Alternate Procedures and Requirements.

Miscellaneous:

CHAPTER 28-106, F.A.C.: Decisions Determining Substantial Interests

CHAPTER 62-110, F.A.C.: Exception to the Uniform Rules of Procedure, effective 07-01-98

CHAPTER 62-256, F.A.C.: Open Burning and Frost Protection Fires, effective 11-30-94

CHAPTER 62-257, F.A.C.: Asbestos Notification and Fee, effective 02-09-99

CHAPTER 62-281, F.A.C.: Motor Vehicle Air Conditioning Refrigerant Recovery and Recycling, effective 09-10-96

ATTACHMENT: CRIST PLOT PLAN

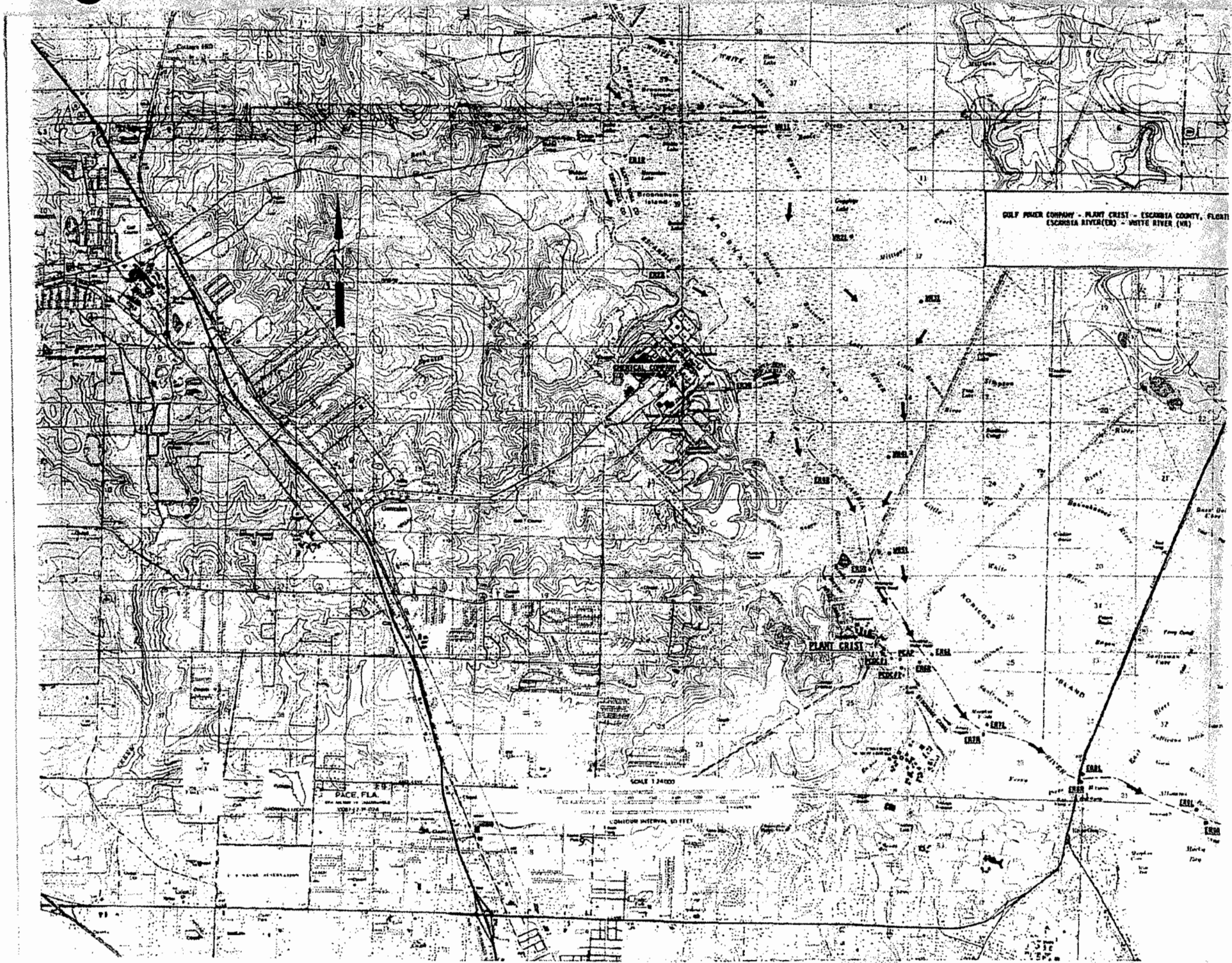
GULF POWER COMPANY - PLANT CREST - ESCAMBIA COUNTY, FLORIDA
ESCAMBIA RIVER (CR) - WHITE RIVER (WR)

PLANT CREST

PAGE, FLA

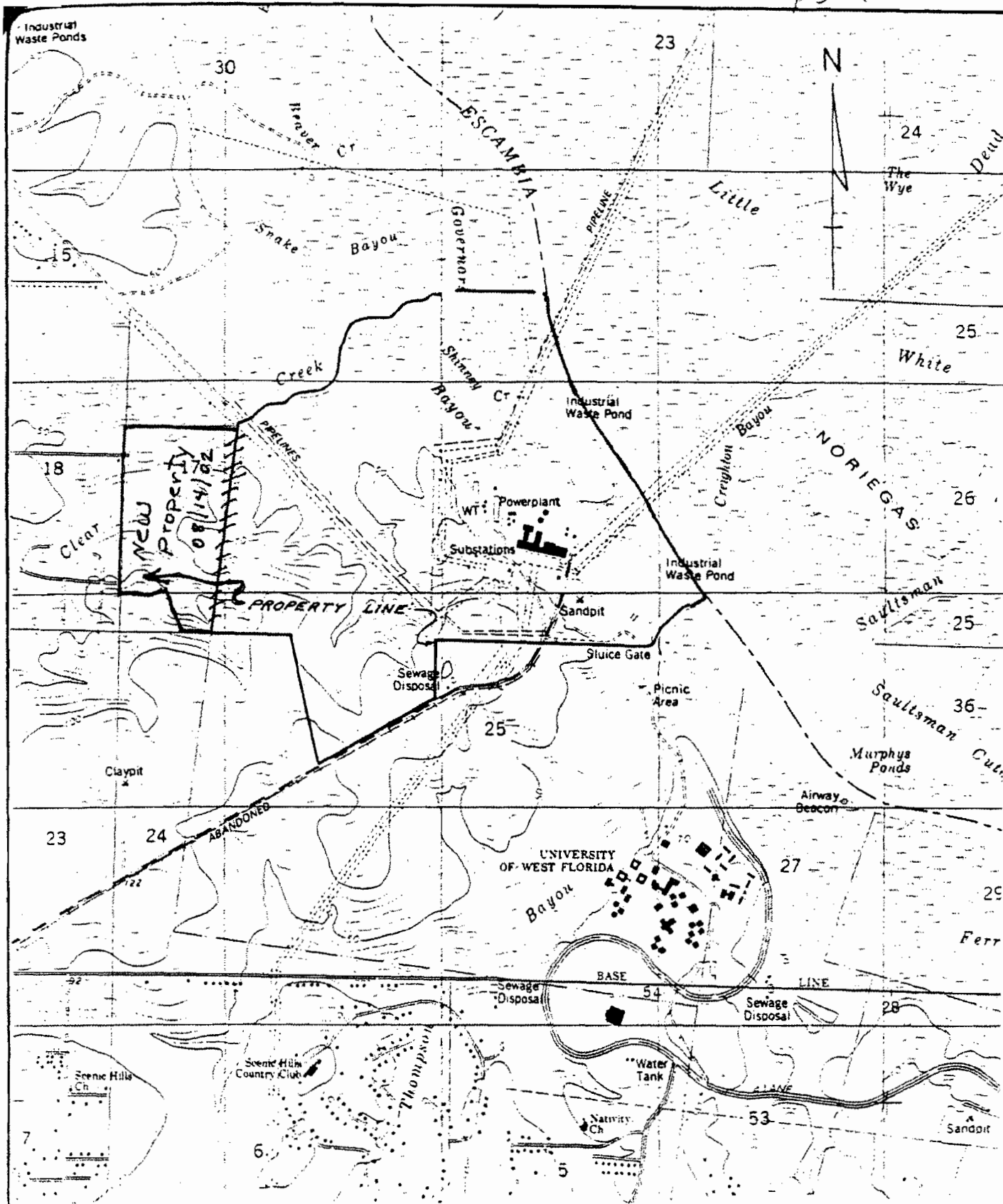
SCALE 1:24000

CONTOUR INTERVAL 40 FEET



GULF POWER COMPANY

FS 1



DR. <i>FLP</i>	SUBJECT CRIST ELECTRIC GENERATING PLANT	
TR.	DETAIL PROPERTY LINES	
DATE 11-13-80 <i>updated 08/14/02</i>	SCALE 1:24,000	SH. OF SHEETS A-4237



N 581250
N 581000
N 580750
N 580500
N 580250
N 580000
N 579750

FOR CONTINUATION SEE DWG EPS-3016-140

MATCH LINE

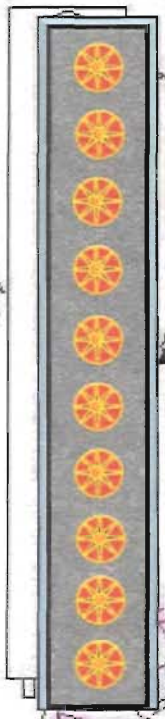
Plant Crist pre SCR, ESP
and Cooling Tower Relocation.

2005

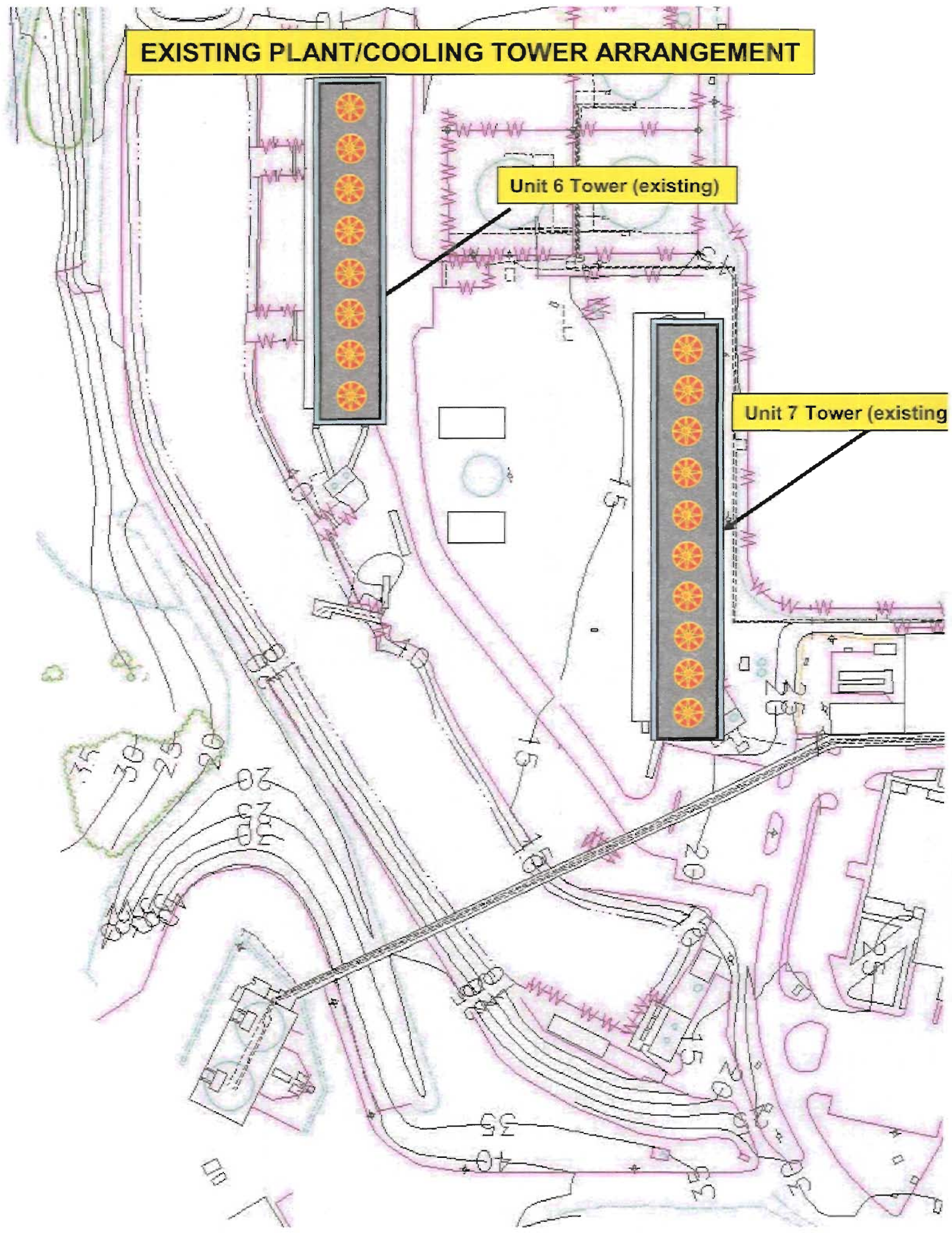
EXISTING PLANT/COOLING TOWER ARRANGEMENT



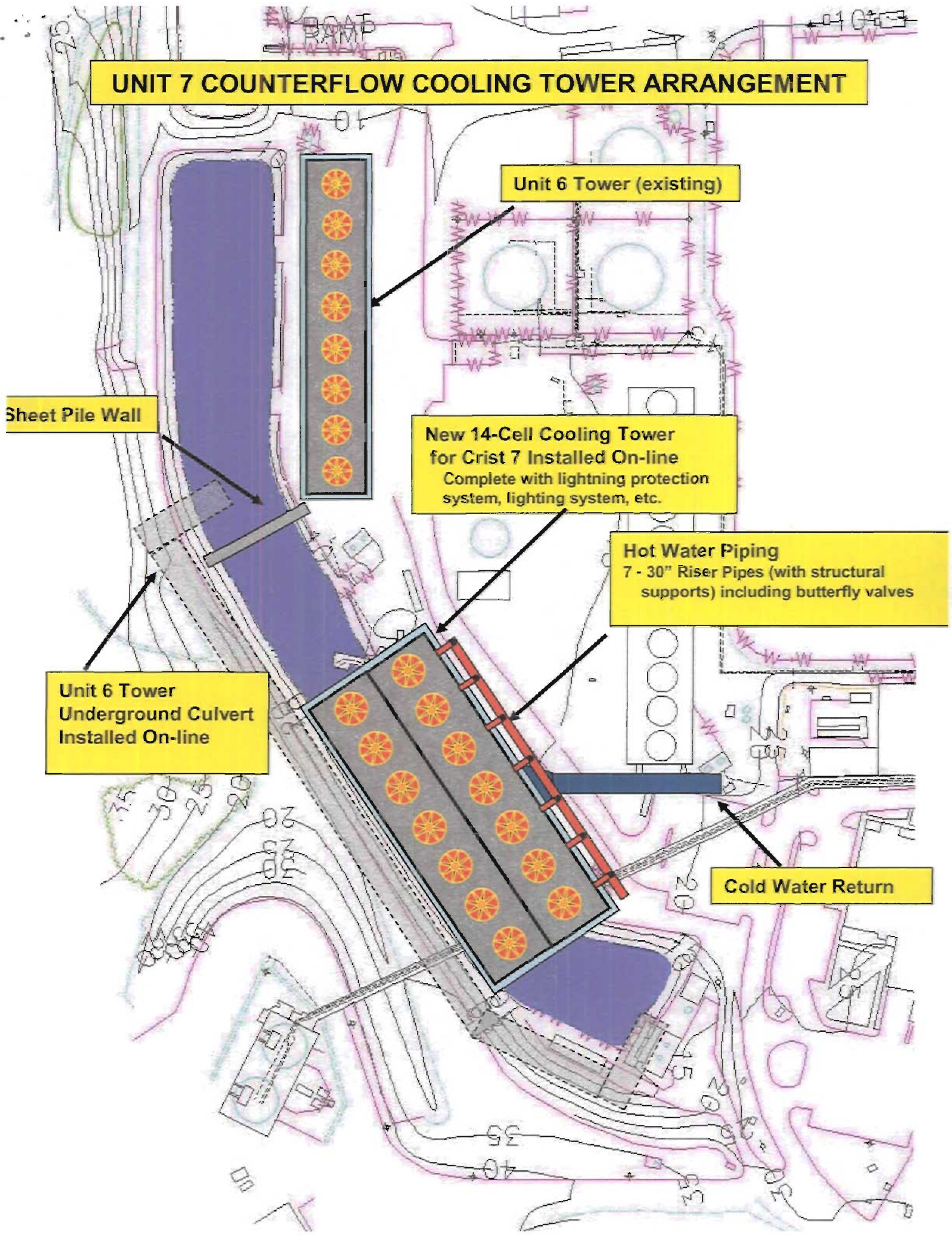
Unit 6 Tower (existing)



Unit 7 Tower (existing)



UNIT 7 COUNTERFLOW COOLING TOWER ARRANGEMENT



Unit 6 Tower (existing)

Sheet Pile Wall

New 14-Cell Cooling Tower for Crist 7 Installed On-line Complete with lightning protection system, lighting system, etc.

Hot Water Piping 7 - 30" Riser Pipes (with structural supports) including butterfly valves

Unit 6 Tower Underground Culvert Installed On-line

Cold Water Return

ATTACHMENT: CRIST 7 TOWER

PROJECT DESCRIPTION: Crist Unit 7 Cooling Tower Replacement

Gulf Power is in the process of designing a Wet Flue Gas Desulphurization (WFGD) scrubber system at Plant Crist to comply with future CAIR and CAMR regulation. The conceptual design plot plan reveals that the present Unit 7 Cooling Tower must be removed to accommodate the installation of the new scrubber system. A new more efficient Unit 7 Cooling Tower is being proposed as a replacement. The proposed replacement tower will be slightly larger (12 to 14 cells) and will include a drift elimination system to reduce particulate emissions. With the new tower design capability there will be a reduction of actual to potential PM and PM-10 emissions of approximately 8980 and 449 tons per year, respectively. Crist Unit 7 unit is projected to experience a heat rate improvement of less than 1% during the summer months due to the more efficient thermal system but this slight change in heat rate will not meaningfully impact the plant dispatch or change the load capability of the unit. The basic design of the cooling system for Crist Unit 7 will remain the same as a closed loop system. The new tower is a standard forced draft design available in today's market. Site preparation will begin in June, 2006. Construction is projected to begin in July, 2006 with startup earmarked for April 15, 2007. Below are the design specifications for the Crist Unit 7 Cooling Tower:

Design Conditions:	Flow	180,000 gal/min
	Hot Water	121 degrees F.
	Cold Water	88 degrees F.
	Wet Bulb	80 degrees F.
	Exit Gas Temperature	115 degrees F.
Tower Description:	Model	NA
	Number of Cells	14
	Pump Head	42.1 ft.
	Fan Diameter	32.8 ft.
	Motor Size	14@ 200 hp
	Brake Horsepower	14@ 200 hp
	Evaporation	not specified
	Drift Rate	.0005 %
Tower Dimension:	Tower Width	105.0 +/- 5% ft.
	Tower Length	367.5 +/- 5% ft.
	Tower Height	68.0 +/- 5% ft.
	Fan Deck Height	55.0 +/- 5% ft.
Basin Dimension:	Basin Width	125.0 +/- 5% ft.
	Basin Length	370.0 +/- 5% ft.

Crist 7 Cooling Tower Netting Analysis

Old Crist 7 Cooling Tower Baseline Calculation

Assumptions: 165k gallons flow/min; drift = 0.2%; TDS = 14,700 ppm; PM10 is 5% of Total PM

PM Hr = 165,000 gal/min * 0.2 gal drift/100 gall flow * 14,700 lb PM/ million lbs H2O * 8.345 lb/gal H2O * 60 min/hr = 2428.9 lb/hr

PM10 Hr = PM hr * 5% fraction = 121.44 lb/hr

Year	Hours of Operation	PM annual Tons/Yr	PM10 annual Tons/Yr
2001	6621	8040.9	402.0
2002	6891	8368.8	418.4
2003	7945	9648.8	482.4
2004	6243	7581.8	379.1
2005	6013	7302.5	365.1
Avg	6742.6	8188.5	409.4
Highest 2 yr Avg	7418	9008.8	450.4

New Crist 7 Cooling Tower Projection

Assumptions: 180K gallons flow/min; drift = 0.0005%; TDS = 14,700 ppm; PM10 is 5% of Total PM

PM Hr = 180,000 gal/min * 0.0005 gal drift/100 gall flow * 14,700 lb PM/ million lbs H2O * 8.345 lb/gal H2O * 60 min/ = 6.62 lb/hr

PM10 Hr = PM hr * 5% fraction = 0.33 lb/hr

Future Year	Hours of Operation	PM annual Tons/Yr	PM10 annual Tons/Yr
Future Year	8760	29.0	1.451

Net Analysis:

PM Past Actual - Future Projected =	9008.8 - 29.0 tons =	8979.8 tons/yr
PM10 Past Actual - Future Projected =	450.4 - 1.45 tons =	449.0 tons/yr

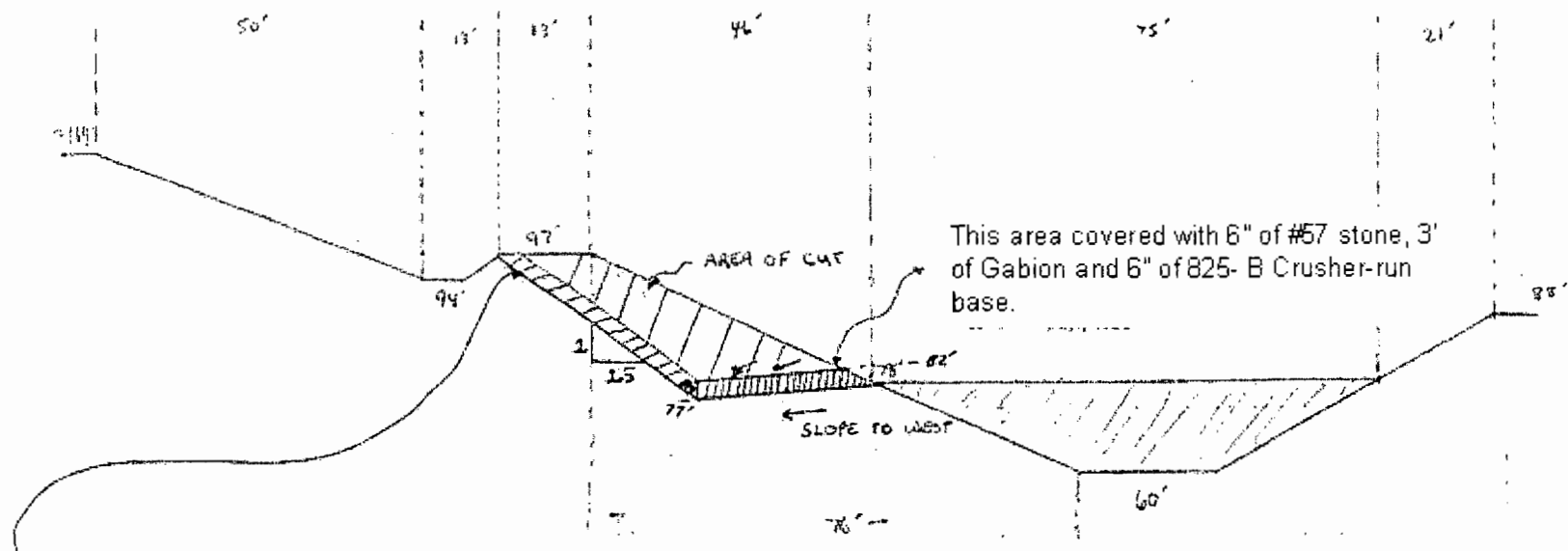
Gulf Power Plant Crist FGD Project

Site Preparation Work Scope

In preparation for relocating the Crist Unit 7 Cooling Tower, an area adjacent to the Unit 6 cooling water canal will be graded to (plant) elevation 77' and covered with stone up to elevation 82'. The new slope will be cut at 1.5 to 1 and covered with rip rap for erosion protection.

The area to be modified starts immediately south of the existing ash line pipe bridge and continues approximately 550' northward along the west bank of the Unit 6 cooling water canal. The existing concrete lined ditch at elevation 94' will be left undisturbed. The new work platform at elevation 82' will be sloped to the west (away from the canal) and to the north so that all storm water running off of the new slope and work platform is collected and directed northward to a point where it will be de-silted and deposited into the canal.

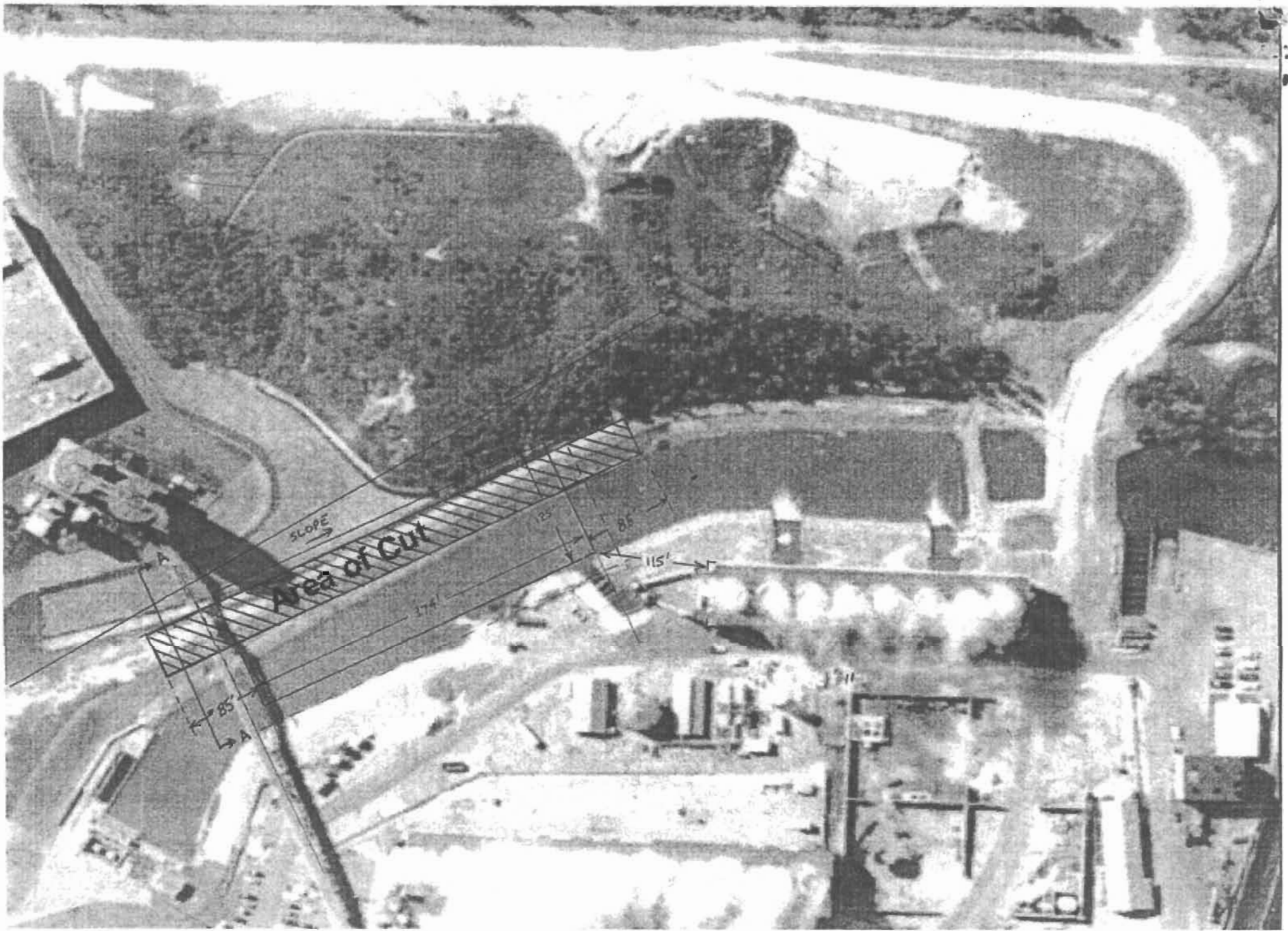
Looking North at Pipe Bridge



This slope covered with 6" of #57 stone, 12" of Gabion and 12"-18" of Class II Rip-Rap for Stabilization and Run-off protection.

This area covered with 6" of #57 stone, 3' of Gabion and 6" of 825- B Crusher-run base.

SECTION A-A





Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

July 13, 2006

Ms. Penny M. Manuel
Vice President, Power Generation
Gulf Power Company
One Energy Place
Pensacola, Florida 32520

Re: Air Construction Permit No. 0330045-014-AC
Gulf Power Company- Crist Electric Generating Plant
Unit 7 Cooling Tower Replacement Project

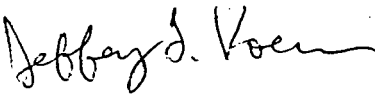
Dear Ms. Manuel:

On June 8, you submitted an application for an air permit to construct a new cooling tower for Unit 7. The new cooling tower will be constructed at the Crist Electric Generating Plant, which is located on Pate Road, off of 10 Mile Road on Governors Bayou, Escambia County. Enclosed are the following documents: "Technical Evaluation and Preliminary Determination", "Draft Permit", "Written Notice of Intent to Issue Air Permit", and "Public Notice of Intent to Issue Air Permit".

The "Technical Evaluation and Preliminary Determination" summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft Permit. The proposed "Draft Permit" includes the specific conditions that regulate the construction of the emissions unit covered by the proposed project. The "Written Notice of Intent to Issue Air Permit" provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation. The "Public Notice of Intent to Issue Air Permit" 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, Jonathan Holtom, P.E., at (850) 921-9531.

Sincerely,

For 
Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/jk/jh
Enclosures

"More Protection, Less Process"

Printed on recycled paper.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

Ms. Penny M. Manuel
Vice President, Power Generation
Gulf Power Company
One Energy Place
Pensacola, Florida 32520

Draft Air Permit No. 0330045-014-AC
Crist Electric Generating Plant
Unit 7 Cooling Tower Project
Escambia County, Florida

Facility Location: The applicant proposes to construct a new Cooling tower for Unit 7 at the existing Crist Electric Generating Plant, which is located on Pate Road, off of 10 Mile Road on Governors Bayou in Pensacola, Escambia County, Florida.

Project: The applicant proposes to construct a new cooling tower for Unit 7. Details of the project are provided in the application and the enclosed "Technical Evaluation and Preliminary Determination".

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Department of Environmental Protection is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 S. Magnolia Drive, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

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 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), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven (7) days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of the Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. 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.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

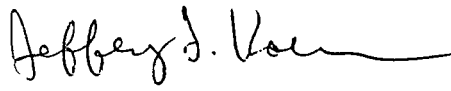
Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's 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 fourteen (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 fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (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 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 how and when each petitioner received notice of the agency action or proposed action; (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; 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.

Executed in Tallahassee, Florida.

For 

Trina L. Vielhauer, Chief
Bureau of Air Regulation

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this "Written Notice of Intent to Issue Air Permit" package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on July 13, 2006 to the persons listed below.

- Penny M. Manuel, Vice President, Power Generation, Gulf Power Company*
- G. Dwain Waters, Q.E.P., Gulf Power Company (E-mail)
- Gregory N. Terry, P.E., Gulf Power Company (E-mail)
- Kevin White, P.E., DEP-NWD (E-mail)
- EPA Region 4 (if necessary)

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.

Victoria Gibson
(Clerk)

7/13/2006
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Bureau of Air Regulation
Draft Air Permit No. 0330045-014-AC
Gulf Power Company – Crist Electric Generating Plant
Escambia County

Applicant: The applicant for this project is Gulf Power Company, One Energy Place, Pensacola, Florida 322520. The applicant's authorized representative is G. Dwain Waters, Q.E.P., Air Quality Programs Supervisor.

Facility Location: The applicant proposes to construct a new cooling tower for Unit 7 at the existing Crist Electric Generating Plant, which is located on Pate Road, off of 10 Mile Road on Governors Bayou in Pensacola, Escambia County, Florida.

Project: The applicant proposes to construct a new 14-cell cooling tower for Crist Unit 7. The new cooling tower has the potential to emit an average of 3.82 tpy of particulate matter. The existing 12-cell cooling tower for Unit 7 will need to be removed in order to make room for a new planned wet flue gas desulphurization (WFGD) scrubber system to comply with the future CAIR and CAMR regulations. The new cooling tower will be constructed on an area that is currently part of the cooling water intake canal. Brackish water with an average TDS value of 1,935 parts per million (as the cooling medium) and a design drift rate of 0.0005% of the circulating flow are proposed. It is expected that actual PM emissions will decrease as a result of this project due to the shutting down of the old, less efficient, cooling tower.

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 regarding this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station 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 and phone number listed above. A copy of the complete project file is also available at the Department of Environmental Protection's Northwest District Office at 160 Governmental Center, Pensacola, Florida 32501-5794 (Telephone: 850/595-8364).

Notice of Intent to Issue Air 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 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 fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

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. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (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 fourteen (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 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 how and when the petitioner received notice of the agency action or proposed action; (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; 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.

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

Gulf Power Company – Crist Unit 7

New Cooling Tower

Escambia County

0330045-014-AC



Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
North Permitting Section

July 13, 2006

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. GENERAL INFORMATION

1.1 APPLICANT NAME AND ADDRESS

Gulf Power Company
One Energy Place
Pensacola, Florida 32520
Authorized Representative: Penny Manuel, Responsible Official

1.2 REVIEWING AND PROCESS SCHEDULE

June 8, 2006 Received Permit Application
June 14, 2006 Application complete

2. FACILITY INFORMATION

2.1 FACILITY LOCATION

The facility is located on Pate Road Rd., off of 10 Mile Road, Escambia County, Florida.

2.2 STANDARD INDUSTRIAL CLASSIFICATION CODES (SIC)

Industry Group No.	49	Electric, Gas and Sanitary Services
Industry No.	4911	Electric Services

2.3 FACILITY CATEGORY

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

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

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

3. DESCRIPTION

This project addresses the following emissions unit(s):

Emissions Unit No.	Emissions Unit Description
014	Unit 7, Mechanical Draft Cooling Tower with a maximum circulation rate of 180,000 GPM.

3.1 PROJECT DESCRIPTION

The project involves the installation and subsequent operation of a new 14 cell cooling tower for Crist Unit 7. The existing 12 cell cooling tower for Unit 7 will need to be removed in order to make room for

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

a new planned wet flue gas desulphurization (WFGD) scrubber system to comply with the future CAIR and CAMR regulations. The new cooling tower will be constructed on an area that is currently part of the cooling water intake canal. Brackish water with an average TDS value of 1,935 parts per million (as the cooling medium) and a design drift rate of 0.0005% of the circulating flow are proposed.

3.2 DESCRIPTION OF CURRENT STATUS

Fossil fuel steam generator unit 7 is a pulverized coal dry bottom, front and rear wall fired boiler. Steam generator unit 7 began commercial operation in 1973. This steam generating unit is constructed with a closed loop cooling system. Make up water for the system is drawn from an intake canal that is fed from the Escambia River.

4. PROJECT EMISSIONS

The following emission decreases are indicated by the applicant:

Pollutant	Past Actual Annual Emissions (TPY)	Future Potential Annual Emissions (TPY)	Net Change	PSD Threshold (TPY)	PSD Review Required
PM	1,400.38	3.82	-1,396.56	25	No
PM ₁₀	840.22	2.29	-837.93	15	No

Notes: The above calculations are based upon the paper "Calculating Realistic PM₁₀ Emissions from Cooling Towers" which is built upon the methodology presented in EPA's AP-42, the portion of PM which is emitted as PM₁₀ decreases as the TDS in the circulating water increases. For this project, the average TDS of the brackish water (1,935 ppm) results in about a 60% fraction of PM₁₀ emissions.

The Department does not render an opinion on the calculations of past actual emissions. However, it does recognize that the design of the new cooling tower (which includes drift eliminators with a drift rate of 0.0005%) will be much more efficient than the existing cooling tower that was not designed with drift eliminators, and that actual PM emissions will decrease as a result of this project.

5.0 PROJECT REVIEW

5.1 APPLICANT REVIEW

The applicant is proposing to build a new cooling tower that includes drift eliminators with a drift rate of 0.0005%, and a total circulating water flow usage limitation of 9.46E10 gallons per year (equivalent to 8,760 hours per year of full operation at 180,000 gallons per minute). This yields a maximum annual PM emissions of 3.82 TPY and a maximum annual PM₁₀ emissions of 2.29 TPY. The applicant states that the cooling tower meets the definition of an unregulated emissions unit pursuant to Rule 62-213. The applicant also states that Unit 7 is projected to experience a heat rate improvement of less than 1% during the summer months due to the more efficient thermal system, but this slight change in heat rate will not meaningfully impact the plant dispatch or change the load capability of the unit.

5.2 DEPARTMENT REVIEW

The Department has previously conducted BACT reviews via an inspection of the RACT/BACT/LAER Clearinghouse for mechanical draft cooling towers permitted between January 2003 and January 2006. Based upon these reviews, the Department has concluded that BACT for mechanical draft cooling towers is almost universally based upon drift eliminators. Additionally, BACT emission rates can be established as low as 0.0005%. It is noted that the lower end of the BACT range (0.0005%) is what the applicant has

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

proposed for this project. Based on the maximum annual water flow rate and the historical annual average total dissolved solids concentration of 1,935 ppm, the expected annual particulate matter emissions from the new cooling tower would be:

$$180,000 \text{ gal/min} * 0.0005\% * 1,935 \text{ ppm} * 8.337 \text{ lb H}_2\text{O/gal} * 60 \text{ min/hr} * 8,760 \text{ Hrs/yr} * 1 \text{ ton/2000 lbs} = 3.82 \text{ tpy.}$$

At a PM₁₀ fraction of 60%, expected annual PM₁₀ emissions from the new cooling tower would be:

$$3.82 \text{ tpy} * 0.60 = 2.29 \text{ tpy}$$

At these levels of emissions based on the average TDS of the cooling water, the unit could potentially qualify as an insignificant emissions unit pursuant to Rule 62-213, F.A.C. However, it was noted in the application that the highest TDS of the cooling water was measured at 14,700 ppm. In the unlikely event that this level of TDS was recorded for an entire year, the PM emissions from the new cooling tower could potentially be as high as:

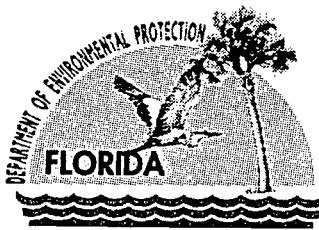
$$180,000 \text{ gal/min} * 0.0005\% * 14,700 \text{ ppm} * 8.337 \text{ lb H}_2\text{O/gal} * 60 \text{ min/hr} * 8,760 \text{ Hrs/yr} * 1 \text{ ton/2000 lbs} = 28.99 \text{ tpy.}$$

In order to be classified as an insignificant emissions unit in the Title V permit, potential emissions would have to remain below 5 tpy. The department agrees that because the new cooling tower does not use chromium as an additive to the cooling water, there are no specific applicable regulatory requirements that apply to the proposed cooling tower. Also, because the potential emissions could possibly exceed 5 tons per year, the new cooling tower will meet the requirements for classification as an unregulated emissions unit when it is added to the Title V permit.

6.0 CONCLUSION

Based on the foregoing technical evaluation of the application, the Department has made a determination that the proposed project is capable of meeting the Department's air emission standards.

Jonathan K Holtom, P.E.
Department of Environmental Protection, Bureau of Air Regulation
North Permitting Section
2600 Blair Stone Road, Mail Station 5505
Tallahassee, Florida 32399-2400



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

PERMITTEE:

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

ARMS Permit No.	0330045-014-AC
Facility ID No.	0330045
SIC No.	4911
Expires:	December 31, 2007

Authorized Representative:

Penny Manuel
Vice President, Power Generation

PROJECT AND LOCATION

The proposed project authorizes the construction of a new 14 cell cooling tower for use with Crist Unit 7 to replace the old 12 cell cooling tower that must be removed to make room for a new wet flue gas desulfurization (WFGD) scrubber system. This project does not authorize any increase in heat input to Unit 7, even though the new cooling tower is larger and more efficient than the old one.

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

STATEMENT OF BASIS

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

APPENDICES

The following Appendix is attached as part of this permit.

Appendix GC Construction Permit General Conditions

DRAFT

Joseph Kahn, PE, Acting Director
Division of Air Resource Management

"More Protection, Less Process"

Printed on recycled paper.

SECTION II. ADMINISTRATIVE REQUIREMENTS

FACILITY DESCRIPTION

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

PROJECT DESCRIPTION

The Project consists of the construction and operation of a new cooling tower comprised of 14 cells, with a width of 105', a length of 367.5', a height of 68', includes drift eliminators rated at 0.0005%, operates at a maximum brackish-water flow rate of 180,000 gallons per minute for all cells combined. Brackish water is sprayed through the tower where fan induced air flow causes evaporative cooling. Water vapor, saltwater droplets (drift) and salt particles are emitted. Drift emissions are controlled by drift eliminators.

REGULATORY CLASSIFICATION

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

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

PERMIT SCHEDULE

- 06-08-06: Date of Receipt of Permit Application
- 06-14-06: Application deemed complete
- 07-12 -06: Intent issued
- xx-xx-xx: Notice published in the XXXXX

RELEVANT DOCUMENTS

The documents listed form the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Application received 06-08-06
- Technical Evaluation and Preliminary Determination dated 07-12-06

SECTION II. ADMINISTRATIVE REQUIREMENTS

GENERAL AND ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (DEP), at 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400. The phone number 850/488-0114 and the fax number is 850/921-9533.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications should be submitted to the FDEP Northwest District Office, 160 Governmental Center, Pensacola, Florida 32501-5794. The phone number is 850/595-8364 and the fax number is 850/595-8417.
3. Terminology: The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code.
4. General Conditions: The owner and operator are subject to, and shall operate under, the attached General Conditions listed in *Appendix GC* of this permit. General Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
5. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 & 62-210.900, F.A.C.]
6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) & 62-212.300(1)(a), F.A.C.]
8. Expiration: This air construction permit shall expire on December 31, 2007. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4) 62-4.080, and 62-4.210, F.A.C.]
9. Title V Permit: This permit authorizes the construction of the permitted emissions unit and initial operation to demonstrate that the stated design parameters were achieved. A Title V operation permit revision is required for continued operation of the permitted emissions unit. The Permittee shall submit an application for a permit revision at least ninety days prior to the expiration date of this air construction permit, but no later than 180 days after the emissions unit commences operation. [Rules 62-4.030 & 62-213.420, F.A.C.]

SECTION III - EMISSIONS UNITS SPECIFIC CONDITIONS

Cooling Tower (EU 014)

DRAFT

EMISSIONS UNITS

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

ID	Emission Unit Description
014	Mechanical Draft Cooling Tower with a maximum circulation rate of 180,000 GPM.

EQUIPMENT

1. Cooling Tower: The permittee is authorized to construct a new 14-cell mechanical draft cooling tower with the following nominal design characteristics: a circulating water flow rate of 180,000 gpm; drift eliminators; and, a drift rate of no more than 0.0005 percent of the circulating water flow. [Application; Design]

EMISSIONS AND PERFORMANCE REQUIREMENTS

2. Hours of Operation: The new cooling tower shall be allowed to operate 8,760 hours per year. [Rule 62-210.200 (PTE), F.A.C.; and, Applicant's requests in AC permit application received June 08, 2006.]
3. Cooling Tower Design: The cooling tower shall be designed, operated and maintained to achieve a drift rate of no more than 0.0005% of the circulating water flow. [Application; Design]

{Note: This equates to an estimated average emission rate of particulate matter (PM) from the cooling tower at 0.87 pounds per hour and 3.82 tpy, based on an average TDS rate of 1,935 ppm. The PM₁₀ emissions are estimated to be approximately 60% of the estimated particulate matter emission rate.}
4. Circulating Water Flow-meter: The cooling tower shall be equipped with a circulating water flow-meter. [Rule 62-4.070, F.A.C.]
5. Drift Rate: Within 60 days of commencing operation, the permittee shall certify that the cooling tower was constructed and installed so as to achieve the specified drift rate of no more than 0.0005 percent of the circulating water flow rate. [Rule 62-4.070, F.A.C.]

{Note: This emissions unit is not subject to a visible emissions limitation. Emissions from this emissions unit include water droplets, so visible emission testing is not possible.}
6. Maintenance: A maintenance plan shall be implemented to assure that the drift elimination system on the cooling tower shall be maintained so as to minimize pluggage and to insure timely repair of broken sections of the drift eliminators. [Rule 62-4.070, F.A.C.]

DRAFT

SECTION 4. APPENDIX GC
CONSTRUCTION PERMIT GENERAL CONDITIONS

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

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

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

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

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

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

SECTION 4. APPENDIX GC
CONSTRUCTION PERMIT GENERAL CONDITIONS

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

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

Friday, Barbara

To: White, Kevin M.; 'GDWATERS@southernco.com'; GNTERRY@southernco.com
Cc: Koerner, Jeff
Subject: DRAFT AC Permit No.: 033045-014-AC - Gulf Power Company - Crist Electric Generating Plant
Attachments: 0330045-014-AC-D.zip

Attached for your records is a zip file for the subject DRAFT AC Permit.

If I may be of further assistance, please feel free to contact me.

Barbara J. Friday
Planner II
Bureau of Air Regulation
(850)921-9524
Barbara.Friday@dep.state.fl.us

7/13/2006

Friday, Barbara

From: System Administrator
To: White, Kevin M.; Koerner, Jeff
Sent: Thursday, July 13, 2006 12:58 PM
Subject: Delivered:DRAFT AC Permit No.: 033045-014-AC - Gulf Power Company - Crist Electric Generating Plant

Your message

To: White, Kevin M.; 'GDWATERS@southernco.com'; 'GNTERRY@southernco.com'
Cc: Koerner, Jeff
Subject: DRAFT AC Permit No.: 033045-014-AC - Gulf Power Company - Crist Electric Generating Plant
Sent: 7/13/2006 12:57 PM

was delivered to the following recipient(s):

White, Kevin M. on 7/13/2006 12:58 PM
Koerner, Jeff on 7/13/2006 12:58 PM



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

P.E. Certification Statement

Permittee:

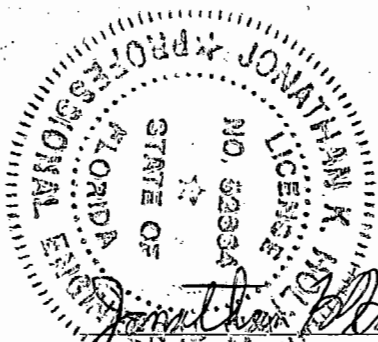
Gulf Power Company
Crist Electric Generating Plant

DRAFT Construction Permit No.: 0330045-014-AC
Facility ID No.: 0330045

Project: Minor Air Construction Permit to Construct New Cooling Tower for Unit 7.

The project involves the installation and subsequent operation of a new 14 cell cooling tower for Crist Unit 7. The existing 12 cell cooling tower for Unit 7 will need to be removed in order to make room for a new planned wet flue gas desulphurization (WFGD) scrubber system to comply with the future CAIR and CAMR regulations. The new cooling tower will be constructed on an area that is currently part of the cooling water intake canal. Brackish water with an average TDS value of 1,935 parts per million (as the cooling medium) and a design drift rate of 0.0005% of the circulating flow are proposed.

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



Jonathan K. Holtom
Jonathan K. Holtom, P.E.
Registration Number: 0052664

7/13/06
Date

Permitting Authority:

Florida Department of Environmental Protection
Division of Air Resources Management, Bureau of Air Regulation
2600 Blair Stone Road, Mail Station #5505
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114
Fax: 850/922-6979

"More Protection, Less Process"

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SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 X *U. Beak* Agent Addressee

B. Received by (Printed Name) *U. R. BEACH* C. Date of Delivery *7-17-06*

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. 7005 1820 0007 9819 8597

7005 1820 0007 9819 8597

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Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To
 Penny M. Manuel

Street, Apt. No.,
 or PO Box No. *One Energy Place*

City, State, ZIP+4
 Pensacola, FL 32520

PS Form 3800, June 2003 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, <i>or</i> on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery JAMES BRAKELY 8-18-06</p>
<p>1. Article Addressed to:</p> <p>Ms. Penny M. Manuel, Vice President, Power Operations Gulf Power Company One Energy Place Pensacola, Florida 32520-0100</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7005 1160 0004 3034 4943</p>

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

7005 1160 0004 3034 4943

U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
Ms. Penny M. Manuel, V.P., Power Oper.	
OFFICIAL USE	
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Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Postmark Here	
Sent To Ms. Penny M. Manuel, V.P., Power Oper.	
Street, Apt. No., or PO Box No. One Energy Place	
City, State, ZIP+4 Pensacola, Florida 32520-0100	
PS Form 3800, June 2002	See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 X *J. Beach* Agent Addressee

B. Received by (Printed Name) *J.R. Beach* C. Date of Delivery *7-17-06*

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
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4. Restricted Delivery? (Extra Fee) Yes

2. 7005 1820 0007 9819 8597

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Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To
 Penny M. Manuel

Street, Apt. No.,
 or PO Box No. One Energy Place

City, State, ZIP+4
 Pensacola, FL 32520

PS Form 3800, June 2002 See Reverse for Instructions

7005 1820 0007 9819 8597

FINAL DETERMINATION

Gulf Power Company
Crist Electric Generating Plant
Air Permit No. 0330045-017-AC

The Department distributed a public notice package on April 23, 2007, to authorize minor revisions to the original Unit 7 SCR construction permit (Permit No. 0330045-005-AC) at the Gulf Power Crist Electric Generating Plant, which is located on Pate Road, off of 10 Mile Road on Governors Bayou, Escambia County. These revisions clarify the NO_x testing requirements and provide more flexibility for the timing of Selective Catalytic Reduction repairs and maintenance. The Public Notice of Intent to Issue was published in The Pensacola News Journal on April 26, 2007.

COMMENTS/CHANGES

No public comments were received during the 14-day public comment period.


CONCLUSION


The final action of the Department is to issue the final permit without any changes.

Florida Department of
Environmental Protection

Memorandum

TO: Joseph Kahn

THRU: Trina Vielhauer 
Jeff Koerner

FROM: Jonathan Holtom 

DATE: May 16, 2007

SUBJECT: Project No. 0330045-017-AC
Final Construction Permit For Gulf Power Crist
Clarification Of NO_x Testing Requirements and Minor Changes To The
Selective Catalytic Reduction (SCR) Bypass Condition

Attached for your approval and signature is a final construction permit for Gulf Power's Crist Electric Generating Plant. This permit makes minor revisions to the original Unit 7 SCR construction permit (Permit No. 0330045-005-AC) to clarify the NO_x testing requirements and to provide more flexibility for the timing of SCR repairs and maintenance.

The Public Notice requirements were met on April 26 by publishing in the Pensacola News Journal. No comments were received from either the public or the applicant in response to this Public Notice, and no petitions were filed for an Administrative Hearing.

I recommend your approval and signature.

Attachments

TLV/jk/jh



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

In the Matter of an
Application for Permit by:

Gulf Power Company
Crist Electric Generating Station
One Energy Place
Pensacola, Florida 32520-0328

Permit No. 0330045-017-AC Facility ID No. 0330045 SIC No. 4911
--

Authorized Representative:

Penny Manuel, Vice President and SPO

On January 23, 2007, Gulf Power submitted an application to revise Conditions of Permit No. 0330045-005-AC. The original permit authorized construction of a new electrostatic precipitator and the installation of a new selective catalytic reduction (SCR) system for Boiler No. 7 (EU-007) at the Crist Electric Generating Station, which is located on Pate Road, off of 10 Mile Road on Governors Bayou, Escambia County, Florida. With regard to this permit, the applicant requested a revision to clarify the testing requirement for the SCR control efficiency and, additional flexibility to bypass the SCR system to perform maintenance or repair. The Department approves these requests as specified in the attached revisions.

Enclosed is the Final Permit Revision, which modifies the original air construction permit. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

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 thirty (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Joseph Kahn, Director
Division of Air Resource Management

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Ms. Penny Manuel, Vice President and SPO
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Air Permit No. 0330045-017-AC
Crist Electric Generating Plant
Escambia County

Enclosed is Final Permit Number 0330045-017-AC. This permit makes minor changes to the original Unit 7 Selective Catalytic Reduction (SCR) construction permit (Permit No. 0330045-005-AC) to clarify the NO_x testing requirements and to provide more flexibility for the timing of SCR repairs and maintenance. This permit is issued pursuant to Chapter 403, Florida Statutes.

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.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

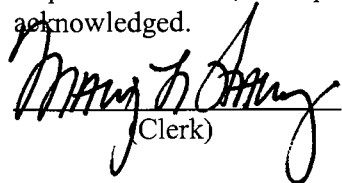
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Determination and the Final Permit) was sent by e-mail with return receipt requested before the close of business on 5/22/07 to the persons listed:

- Ms. Penny M. Manuel, Gulf Power Company (pmmanuel@southernco.com)
- Mr. G. Dwain Waters, Gulf Power Company (gdwaters@southernco.com)
- Mr. Tom Davis, ECT (tdavis@ectinc.com)
- Mr. Rick Bradburn, NWD (rick.bradburn@dep.state.fl.us)
- Mr. Gregg Worley, EPA Region 4 (worley.gregg@epa.gov)

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Clerk

5/22/07
(Date)

FINAL PERMIT REVISION

Permit No. 0330045-017-AC (Revises Original Permit No. 0330045-005-AC)

The following emissions unit is addressed in this permit revision:

ID No.	Common Emission Unit Description
-007	Boiler Number 7 (6,406.4 million Btu per hour)

All construction related to the selective catalytic reduction (SCR) project that was authorized by Permit No. 0330045-005-AC is complete and no further construction is authorized by this action. The permit conditions are revised as follows. All other conditions are unchanged and the affected emissions units remain subject to the applicable requirements. Deletions are indicated by “~~strike through~~” and additions are indicated by “double underline”.

1. To provide additional flexibility to bypass the SCR system to perform maintenance or repair during the ozone season, Specific Condition No. 3.A.9. of Permit No. 0330045-005-AC is changed as follows:

9. SCR Bypass, Catalyst Maintenance and Repair: The permittee may bypass the SCR system to perform ~~catalyst~~ maintenance and repair for up to ~~15 days~~ 360 hours per ~~year~~ consecutive 12 months during the ~~non-ozone season~~ events. During such allowable bypass periods, the uncontrolled NOx emissions from Unit 7 shall not exceed 0.35 lb/MMBtu based on a 24-hour average. The daily NOx emission rates for these periods may be excluded from the plant-wide 30-day NOx standard specified in Subsection 3B. The permittee shall notify the Compliance Authority in advance of the purpose of the SCR bypass, the expected dates of SCR bypass, and the expected duration of SCR bypass. To the extent practical, the permittee shall schedule regular maintenance of the SCR system for the non-ozone season. {Permitting Note: The ozone season is defined as May 1st through September 15th. An Ozone event is defined as any level on the Air Quality Index for Ozone greater than good or moderate (green or yellow).} [Rules 62-210.700 and 62-4.070(3), F.A.C.]

2. To clarify the testing requirement for the SCR control efficiency, Specific Condition No. 3.A.12. of Permit No. 0330045-005-AC is changed as follows:

12. Nitrogen Oxides, Compliance Tests: Within 60 days after completing construction of the SCR system and bringing Unit 7 on line, the permittee shall conduct tests to demonstrate compliance with the design specification to achieve no less than an 85% reduction in the nitrogen oxide emission rate, as compared to the baseline emissions rate of 0.70 lb/MMBtu. The permittee shall concurrently test the SCR inlet and SCR outlet in accordance with EPA Method 7E as adopted by reference in Rule 62-204.800, F.A.C. Data collected during the annual NOx RATA testing may be used to represent NOx emissions at the SCR outlet. Alternatively, the permittee may submit data collected from the NOx rate process monitors at the SCR inlet and SCR outlet, which are part of the ammonia injection system. The data shall be collected for at least three consecutive hours. Subsequent tests shall be conducted during each federal fiscal year (October 1st to September 30th) in order to demonstrate that the SCR system continues to operate at the designed level of operation (i.e., 85% reduction from the baseline rate). [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

3. To provide consistency and clarity, Specific Condition No. 3.B.2. of Permit No. 0330045-005-AC is changed as follows:

2. Plant-Wide NOx Limit: Emissions of nitrogen oxides (NOx) from the combined operation of Units 4, 5, 6, and 7 shall not exceed 0.2 lb/MMBtu heat input based on a 30-day rolling average except for periods when Unit 7 is shutdown. The plant-wide daily NOx emission rate shall be determined by the following equation:

FINAL PERMIT REVISION

$$\text{Plant-Wide Daily MMBtu-Weighted NOx Emission Rate} = \frac{\sum_{\text{Units 4, 5, 6, 7}} [(\text{Unit \# daily MMBtu}) \times (\text{Unit \# daily NOx CEMS Rate})]}{\sum_{\text{Units 4, 5, 6, 7}} (\text{Unit \# daily MMBtu})}$$

The “Unit # daily MMBtu” shall be determined by the daily as-burned fuel analysis and the fuel fired for each unit. The “Unit # daily NOx CEMS Rate” shall be determined by the daily average of NOx CEMS data for each unit and reported in terms of “lb/MMBtu heat input”. The plant-wide daily NOx emissions rate shall be determined each day regardless of the operating status for Unit 7. The plant-wide 30-day rolling NOx average shall be determined for each 30 sequential Unit 7 operating days, which need not be consecutive. A Unit 7 operating day means any calendar day that Unit 7 operates a minimum of 18 hours. The Unit 7 daily NOx CEMS rate may consist of less than 18 hours of data if this is due to: CEMS malfunction; or invalid CEMS data; or exempted data due to start up, shut down or SCR bypass, described below. When the catalyst temperature is below 600° F during a startup or shutdown, NOx emissions data collected during such periods may be excluded from the daily NOx average CEMS Rate. In accordance with Condition No. 9 of Subsection 3A, limited NOx emissions data collected during SCR bypass during ~~the non-ozone season~~ events may be excluded from the daily NOx average CEMS Rate. The plant-wide NOx emission standard shall be achieved by utilizing the SCR system for Unit 7 and implementing the selected NOx control strategy for Units 4, 5, and 6. The effective date for the plant-wide NOx emission standard is:

- a. The startup date of the selected additional NOx reduction project, (excluding an SCR project for Unit 6), but no later than May 1, 2006; or
- b. The startup date of the SCR project for Unit 6, but no later than December 31, 2007.

For purposes of this condition, “startup date” shall mean the date that the permittee demonstrates initial compliance with the terms of the required air construction permit (or other Department approval) that authorized implementation of the additional NOx reduction project. [Paragraphs 2, 3 and Exhibit B of the Agreement]

Friday, Barbara

From: Harvey, Mary
Sent: Tuesday, May 22, 2007 3:48 PM
To: 'Ms. Penny M. Manuel, Gulf Power Company'; 'Mr. G. Dwain Waters, Gulf Power Company'; 'Mr. Tom Davis, ECT'; Bradburn, Rick; 'Mr. Gregg Worley, EPA Region 4'
Cc: Holtom, Jonathan; Adams, Patty; Gibson, Victoria
Subject: Gulf Power Company - Facility ID No. 0330045-017-AC-FINAL
Attachments: 0330045.017.AC.F_pdf.zip

Dear Sir/Madam:

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

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

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

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

Thank you,

DEP, Bureau of Air Regulation

6/26/2007

Friday, Barbara

From: Harvey, Mary
Sent: Wednesday, May 23, 2007 9:00 AM
To: Adams, Patty
Subject: FW: Gulf Power Company - Facility ID No. 0330045-017-AC-FINAL

From: Tom Davis [mailto:tdavis@ectinc.com]
Sent: Tuesday, May 22, 2007 5:41 PM
To: Harvey, Mary
Subject: RE: Gulf Power Company - Facility ID No. 0330045-017-AC-FINAL

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Tuesday, May 22, 2007 3:48 PM
To: Ms. Penny M. Manuel, Gulf Power Company; Mr. G. Dwain Waters, Gulf Power Company; Mr. Tom Davis, ECT; Bradburn, Rick; Mr. Gregg Worley, EPA Region 4
Cc: Holtom, Jonathan; Adams, Patty; Gibson, Victoria
Subject: Gulf Power Company - Facility ID No. 0330045-017-AC-FINAL

Dear Sir/Madam:

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

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

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

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

Thank you,

DEP, Bureau of Air Regulation

6/26/2007

Friday, Barbara

From: Harvey, Mary
Sent: Wednesday, May 23, 2007 9:00 AM
To: Adams, Patty
Subject: FW: Gulf Power Company - Facility ID No. 0330045-017-AC-FINAL

From: Bradburn, Rick
Sent: Wednesday, May 23, 2007 8:07 AM
To: Harvey, Mary
Subject: Read: Gulf Power Company - Facility ID No. 0330045-017-AC-FINAL

Your message

To: 'Ms. Penny M. Manuel, Gulf Power Company'; 'Mr. G. Dwain Waters, Gulf Power Company'; 'Mr. Tom Davis, ECT'; Bradburn, Rick;
'Mr. Gregg Worley, EPA Region 4'
Cc: Holtom, Jonathan; Adams, Patty; Gibson, Victoria
Subject: Gulf Power Company - Facility ID No. 0330045-017-AC-FINAL
Sent: 5/22/2007 3:48 PM

was read on 5/23/2007 8:07 AM.

RECEIVED

MAY 07 2007

BUREAU OF AIR REGULATION

Certified Mail



April 30, 2007

Mr. Jonathan K. Holtom, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Holtom:

RE: CRIST ELECTRIC GENERATION FACILITY
DEP File No. 0330045-016-AV & 0330045-017-AC
Intent to Issue Crist Air Construction – Public Notice Affidavit
Intent to Issue Title V Permit Revision - Public Notice Affidavit

Attached, please find Gulf Power's proof of publication, i.e., newspaper affidavit regarding the Public Notice of Intent to Issue Draft Crist Air Construction Permit & Draft Title V Operation Permit Revision originally sent to Penny M. Manuel (Gulf Power) on April 23, 2007. An electronic (pdf) version of this affidavit was sent you earlier today.

Please let me know if you have any questions regarding this matter and if you receive any public comments regarding this permit.

Sincerely,

A handwritten signature in black ink that reads "Dwain Waters, Q.E.P." The signature is written in a cursive style.

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

Cc: Jim Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Rick Bradburn, FDEP, Northwest District

PENSACOLA News Journal

Informed. In Tune. In Touch.

RECEIVED

MAY 22 2007

BUREAU OF AIR REGULATION

Published Daily-Pensacola, Escambia County, FL

PROOF OF PUBLICATION

State of Florida

County of Escambia:

Before the undersigned authority personally appeared **LESLEY L. WHALEY** who on oath, says that she is a personal representative of the Pensacola News Journal, a daily newspaper published in Escambia County, Florida; that the attached copy of advertisement, being a Legal in the matter of:

PUBLIC NOTICE OF INTENT TO CONCURRENTLY ISSUE AN AIR CONSTRUCTION PERMIT & TITLE V AIR OPERATION PERMIT REVISION

Was published in said newspaper in the issue(s) of:

APRIL 26, 2007

Affiant further says that the said Pensacola News Journal is a newspaper published in said Escambia County, Florida, and that the said newspaper has heretofore been published in said Escambia County, Florida, and has been entered as second class matter at the Post Office in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this 26TH Day of APRIL, 2007, by **LESLEY L. WHALEY** who is personally known to me.

Lesley L. Whaley Affiant

Nikki E. Nichols Notary Public

NIKKI E. NICHOLS
Notary Public-State of FL
Comm. Exp. Aug. 01, 2009
Comm. No. DD 427341

PUBLIC NOTICE OF INTENT TO CONCURRENTLY ISSUE AN AIR CONSTRUCTION PERMIT & TITLE V AIR OPERATION PERMIT REVISION

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Construction Permit No. 0330045-017-AC
Draft Title V Operation Permit Revision No.: 0330045-016-AV

Gulf Power Company
Crist Electric Generating Station
Escambia County

Applicant: The applicant for this project is Gulf Power Company. The applicant's responsible official is: Ms. Penny Manuel, Vice President and SPO, One Energy Place, Pensacola, Florida 32520.

Facility Location: Gulf Power Company operates the existing Crist Electric Generating Station, which is located on Pate Road, off of 10 Mile Road on Governors Boulevard, Escambia County

Project: The applicant, Gulf Power Company, applied on October 30, 2006 to the Department for a Title V Air Operation Permit revision to incorporate the terms and conditions of Air Construction Permit Nos. 0330045-011-AC, 0330045-012-AC and 0330045-013-AC. These projects authorized the construction of a mercury injection search center, Selective Non-Catalytic Reduction (SNCR) on Unit 6, and SNCR Units 4 and 5, respectively. The applicant also requested a revision of Permit No. 0330045-005-AC to change the NOX testing requirements and PM testing frequency for Unit 7. As a result, Air Construction Permit No. 0330045-017-AC is being issued concurrently with, and incorporated into, the Title V Air Operation Permit revision. This revision process is also being used to replace the existing Appendix 1 4, Title V Conditions with Appendix TV-6, Title V Condition, as well as other minor administrative corrections noted in the Statement of Basis. These changes, as outlined in the Draft Title V Air Operation Permit Revision, are the only portions of the Title V permit that are open for review and subject to Public Comment.

Permitting Authority: Applications for Permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-213 and 62-214, Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Permit is required to operate the facility. The Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a Permit determination regarding this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32304. 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 for holidays) at the address indicated above for the Permitting Authority. The complete project file includes the DRAFT Permits, the Statement of Basis, 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 and phone number listed above, or may view the DRAFT Permit by visiting the following website: <http://www.dep.state.fl.us/air/e/products/ards/>. A copy of the complete project file is also available at:

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/921-9533

Affected District:
Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8096

Notice of Intent to Issue an Air Permit: The Permitting Authority gives notice of intent to concurrently issue an Air Construction permit and a Title V Air Operation Permit Revision to the applicant for the project described above. The applicant is provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a PROPOSED Title V Air Operation Permit and subsequent FINAL Air Construction and Title V Air Operation Permits in accordance with the conditions of the DRAFT Permits unless a response received in accordance with the following procedures results in a different decision or a significant change in terms or conditions.

Comments: The Permitting Authority will accept written comments concerning Draft Air Construction Permit for a period of fourteen (14) days from the date of publication of this Public Notice and will accept comments concerning the DRAFT Title V Air Operation Permit for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be post-marked, and all e-mail or facsimile comments must be received by the close of business (5 pm), on or before the end of the 14-day or 30-day periods by the Permitting Authority at the above address, e-mail or facsimile. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action if the Permitting Authority determines there is sufficient interest for a public meeting will publish notice of the time, date, and location in the Florida Administrative Website (<http://faw.dos.state.fl.us/>) and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or requests received at a public meeting result in a significant change to the DRAFT Permits, the Permitting Authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting 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 3 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (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 notification of agency action may file a petition within fourteen (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 fa

or 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. 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.

Objections: In addition to the above right to petition, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding objections, visit the EPA Region 4 web site at: www.epa.gov/region4/air/permits/florida.htm.

Harvey, Mary

11/8/07

From: Manuel, Penny Morris [PManuel@southerncc.com]
To: Harvey, Mary
Sent: Wednesday, November 14, 2007 12:16 PM
Subject: Read: FW: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

Your message

To: PManuel@southernco.com
Subject:

was read on 11/14/2007 12:16 PM.

Harvey, Mary

From: Bradburn, Rick
Sent: Wednesday, November 14, 2007 11:21 AM
To: Harvey, Mary
Subject: RE: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

Received...

Thanks, Rick Bradburn

From: Harvey, Mary
Sent: Wednesday, November 14, 2007 10:20 AM
To: 'Ms. Penny Manuel, Gulf Power Company'; 'Mr. Gregory N. Terry, Gulf Power Company'; Bradburn, Rick
Cc: Branum, Corrie
Subject: FW: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

On Thursday, November 9th this permit was emailed to you. If you have received this permit please email me back so that I can attached the read receipt to the file copy of this permit for completion.

Thanks again,
Mary Harvey

From: Harvey, Mary
Sent: Friday, November 09, 2007 3:12 PM
To: Harvey, Mary
Subject: FW: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

From: Harvey, Mary
Sent: Thursday, November 08, 2007 2:51 PM
To: 'Ms. Penny Manuel, Gulf Power Company'; 'Mr. Theodore J. McCullough, Gulf Power Company'; 'Mr. Glenn Waters, Gulf Power Company'; 'Mr. Gregory N. Terry, Gulf Power Company'; 'Ms. Kathleen Forney'; Bradburn, Rick
Cc: Branum, Corrie; Adams, Patty; Gibson, Victoria
Subject: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

Dear Sir/Madam:

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

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

11/14/2007

Harvey, Mary

From: Terry, Greg N. [GNTERRY@southernco.com]
To: Harvey, Mary
Sent: Wednesday, November 14, 2007 2:12 PM
Subject: Read: FW: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

Your message

To: GNTERRY@southernco.com
Subject:

was read on 11/14/2007 2:12 PM.

Florida Department of Environmental Protection

Memorandum

TO: Joseph Kahn, Division of Air Resource Management

THRU: Trina Vielhauer, Bureau of Air Regulation *TV*
Jeff Koerner, Air Permitting North Section *JK*

FROM: Corrie Branum, Air Permitting North Section *CB*

DATE: November 6, 2007

SUBJECT: Project No. 0330045-019-AC
Gulf Power Company
Crist Electric Generating Plant
Unit 7 Cooling Tower Revision

The Final Permit for this project is attached for your approval and signature. The project authorizes the revision of emission unit 014 circulating water pump permitted capacity from 180,000 gpm to 190,000 gpm. The existing plant is located in Escambia County at Pate Road (Off of 10 Mile Road) in Pensacola, Florida. The project results in a minor source air construction permit and is not subject to PSD preconstruction review. I recommend your approval of the attached Final Permit for this project.

Attachments

Harvey, Mary

From: Harvey, Mary
Sent: Wednesday, November 14, 2007 11:20 AM
To: 'Ms. Penny Manuel, Gulf Power Company'; 'Mr. Gregory N. Terry, Gulf Power Company'; Bradburn, Rick
Cc: Branum, Corrie
Subject: FW: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL
Attachments: 0330045-019-AC Final Appendix GC.PDF; 0330045-019-AC Final Determination.PDF; 0330045-019-AC Final Permit.PDF; 0330045-019-AC Notice of Final Permit.PDF; SIGNED DOCUMENTS - 0330045-019-AC-FINAL.pdf

Tracking:	Recipient	Delivery	Read
	'Ms. Penny Manuel, Gulf Power Company'		
	'Mr. Gregory N. Terry, Gulf Power Company'		
	Bradburn, Rick	Delivered: 11/14/2007 11:20 AM	Read: 11/14/2007 11:21 AM
	Branum, Corrie	Delivered: 11/14/2007 11:20 AM	Read: 11/14/2007 11:21 AM

On Thursday, November 9th this permit was emailed to you. If you have received this permit please email me back so that I can attached the read receipt to the file copy of this permit for completion.

Thanks again,
 Mary Harvey

From: Harvey, Mary
Sent: Friday, November 09, 2007 3:12 PM
To: Harvey, Mary
Subject: FW: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

From: Harvey, Mary
Sent: Thursday, November 08, 2007 2:51 PM
To: 'Ms. Penny Manuel, Gulf Power Company'; 'Mr. Theodore J. McCullough, Gulf Power Company'; 'Mr. Glenn Waters, Gulf Power Company'; 'Mr. Gregory N. Terry, Gulf Power Company'; 'Ms. Kathleen Forney'; Bradburn, Rick
Cc: Branum, Corrie; Adams, Patty; Gibson, Victoria
Subject: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

Dear Sir/Madam:

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

The document(s) may require immediate action within a specified time frame. Please open

11/14/2007

Harvey, Mary

From: Bradburn, Rick
To: Harvey, Mary
Sent: Wednesday, November 14, 2007 11:21 AM
Subject: Read: FW: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

Your message

To: 'Ms. Penny Manuel, Gulf Power Company'; 'Mr. Gregory N. Terry, Gulf Power Company'; Bradburn, Rick
Cc: Branum, Corrie
Subject: FW: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL
Sent: 11/14/2007 11:20 AM

was read on 11/14/2007 11:21 AM.

Harvey, Mary

From: Forney.Kathleen@epamail.epa.gov
Sent: Friday, November 09, 2007 1:13 PM
To: Harvey, Mary
Subject: Re: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

Got it, Thanks

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

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

"Harvey, Mary"
<Mary.Harvey@dep
.state.fl.us>

11/08/2007 02:51
PM

To
"Ms. Penny Manuel, Gulf Power
Company"
<pmmanuel@southernco.com>, "Mr.
Theodore J. McCullough, Gulf
Power Company"
<tjmuccull@southernco.com>, "Mr.
Glenn Waters, Gulf Power Company"
<gdwaters@southernco.com>, "Mr.
Gregory N. Terry, Gulf Power
Company"
<gnterry@southernco.com>,
Kathleen Forney/R4/USEPA/US@EPA,
"Bradburn, Rick"
<Rick.Bradburn@dep.state.fl.us>

cc
"Branum, Corrie"
<Corrie.Branum@dep.state.fl.us>,
"Adams, Patty"
<Patty.Adams@dep.state.fl.us>,
"Gibson, Victoria"
<Victoria.Gibson@dep.state.fl.us>
Subject

GULF POWER COMPANY -
PROJECT#0330045-019-AC-FINAL

Dear Sir/Madam:

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

Harvey, Mary

From: Branum, Corrie
Sent: Friday, November 09, 2007 8:59 AM
To: Harvey, Mary
Subject: FW: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

I got this email from Dwain.

Corrie Branum
Bureau of Air Regulation
850.921.8968
850.921.9533 (fax)

From: Waters, G. Dwain [mailto:GDWATERS@southernco.com]
Sent: Friday, November 09, 2007 8:54 AM
To: Branum, Corrie
Subject: FW: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

I routed the email to Ted McCullough regarding the receipt of the Crist Cooling Tower permit referenced above. Please let me know if you have any questions. Thanks, Dwain

From: Waters, G. Dwain
Sent: Thursday, November 08, 2007 2:22 PM
To: Harvey, Mary; Manuel, Penny Morris; Mr. Theodore J. McCullough, Gulf Power Company; Terry, Greg N.; Ms. Kathleen Forney; Bradburn, Rick
Cc: Branum, Corrie; Adams, Patty; Gibson, Victoria
Subject: RE: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

Yes, Gulf has received the electronic AC 0330045-019 Final . Thanks, Dwain

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) 444-6217
gdwaters@southernco.com

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Thursday, November 08, 2007 1:51 PM
To: Manuel, Penny Morris; Mr. Theodore J. McCullough, Gulf Power Company; Waters, G. Dwain; Terry, Greg N.; Ms. Kathleen Forney; Bradburn, Rick

11/14/2007

Harvey, Mary

From: Waters, G. Dwain [GDWATERS@southernco.com]
Sent: Thursday, November 08, 2007 3:22 PM
To: Harvey, Mary; Manuel, Penny Morris; Mr. Theodore J. McCullough, Gulf Power Company; Terry, Greg N.; Ms. Kathleen Forney; Bradburn, Rick
Cc: Branum, Corrie; Adams, Patty; Gibson, Victoria
Subject: RE: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

Yes, Gulf has received the electronic AC 0330045-019 Final . Thanks, Dwain

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) 444-6217

gdwaters@southernco.com

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Thursday, November 08, 2007 1:51 PM
To: Manuel, Penny Morris; Mr. Theodore J. McCullough, Gulf Power Company; Waters, G. Dwain; Terry, Greg N.; Ms. Kathleen Forney; Bradburn, Rick
Cc: Branum, Corrie; Adams, Patty; Gibson, Victoria
Subject: GULF POWER COMPANY - PROJECT#0330045-019-AC-FINAL

Dear Sir/Madam:

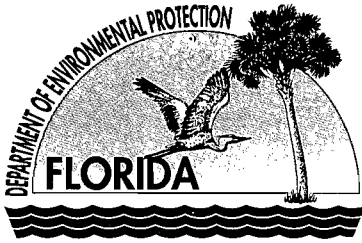
Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt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

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

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

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to

11/8/2007



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE:

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

Authorized Representative:

Penny Manuel
Vice President, Power Generation

ARMS Permit No. 0330045-019-AC

Facility ID No. 0330045

SIC No. 4911

Expires: December 31, 2007

PROJECT AND LOCATION

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

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

STATEMENT OF BASIS

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

APPENDICES

The following Appendix is attached as part of this permit.

Appendix GC Construction Permit General Conditions

Joseph Kahn, Director
Division of Air Resource Management

FINAL DETERMINATION

PERMITTEE

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

PERMITTING AUTHORITY

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

PROJECT

Project No. 0330045-019-AC
Crist Electric Generating Plant

Gulf Power Company operates an existing electrical generating power plant (SIC No. 4911) located in Escambia County at Pate Road (Off of 10 Mile Road) in Pensacola, Florida. The UTM coordinates are Zone 16, 478.27 km east and 3381.36 km north. This air construction permit revises emission unit 014 circulating water pump permitted capacity from 180,000 gpm to 190,000 gpm.

NOTICE AND PUBLICATION

The Department distributed an Intent to Issue Permit package on October 15, 2007. The applicant published the Public Notice of Intent to Issue in the Pensacola News Journal on October 17, 2007. The Department received the proof of publication on October 25, 2007.

COMMENTS

No comments on the Draft Permit were received from the public, the Department's Northwest District Office, the EPA Region 4 Office, the National Park Service, or the applicant.

CONCLUSION

The final action of the Department is to issue the permit.

SECTION I. GENERAL INFORMATION (FINAL)

FACILITY DESCRIPTION

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

PROJECT DESCRIPTION

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

REGULATORY CLASSIFICATION

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

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

SECTION II. ADMINISTRATIVE REQUIREMENTS (FINAL)

GENERAL AND ADMINISTRATIVE REQUIREMENTS

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

SECTION III - EMISSIONS UNITS SPECIFIC CONDITIONS (FINAL)

Cooling Tower (EU 014)

EMISSIONS UNITS

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

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

EQUIPMENT

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

EMISSIONS AND PERFORMANCE REQUIREMENTS

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

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

SECTION 4. APPENDIX GC
CONSTRUCTION PERMIT GENERAL CONDITIONS

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

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

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

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

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

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

SECTION 4. APPENDIX GC
CONSTRUCTION PERMIT GENERAL CONDITIONS

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

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

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF FINAL PERMIT

In the Matter of an Application for Permit by:

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

Project No. 0330045-019-AC
Crist Electric Generating Plant
Unit 7 Cooling Tower Revision
Escambia County

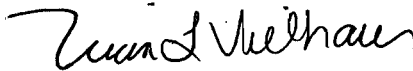
Authorized Representative:

Ms. Penny Manuel, Vice President, Power Generation

Enclosed is the final air construction permit, which revises emission unit 014 circulating water pump permitted capacity from 180,000 gpm to 190,000 gpm. The existing plant is located in Escambia County at Pate Road (Off of 10 Mile Road) in Pensacola, Florida. As noted in the attached Final Determination, only minor changes and clarifications were made to the permit as drafted. This permit is issued pursuant to Chapter 403, Florida Statutes.

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.



Trina Vielhauer, Chief
Bureau of Air Regulation

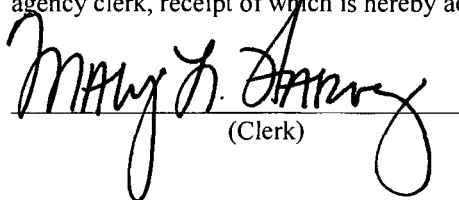
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Permit and Final Determination) was sent by electronic mail with received receipt requested to the persons listed below.

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

Clerk Stamp

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


(Clerk)

11/08/07
(Date)

One Energy Place
Pensacola, Florida 32520

850.505.5111

RECEIVED

OCT 29 2007

BUREAU OF AIR REGULATION



Certified Mail

October 25, 2007

Ms. Corrie Branum
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5505
Tallahassee, Florida 32399-2400

Dear Ms. Branum:

RE: CRIST ELECTRIC GENERATING PLANT
PROPOSED CRIST COOLING TOWER & TITLE V PERMIT REVISIONS
AIR PERMIT NO. 0330045-019-AC
AIR PERMIT NO. 0330045-020-AV

Please find enclosed Gulf Power's "Proof of Publication" for the above referenced permit revisions for the Crist Cooling Tower Project.

We appreciate your efforts to work with us regarding Gulf's scheduling of this project. Please call me regarding any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "G. Dwain Waters, Q.E.P.".

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

cc: w/att: Jim Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Greg Terry, Gulf Power Company
Gary Perko, Hopping, Green & Sams
Rick Bradburn, FDEP Northwest District Office, Pensacola, Florida

PENSACOLA News Journal Informed. In Tune. In Touch.

RECEIVED

OCT 29 2007

BUREAU OF AIR REGULATION

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection

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

Crist Electric Generating Plant Escambia County, Florida

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

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

Project: The purpose of this project is to revise air Permit No. 0330045-019-AC and concurrently revise air Permit No. 0330045-016-AV. Permit No. 0330045-016-AV authorized Gulf Power to install and operate a 14 cell cooling tower. The new cooling tower, which was completed and began service in July 2006, includes drift eliminators with a draft rate of 0.0005%. The existing pumps are sized and cannot reliably provide adequate recirculating flow rate for the tower. The applicant requests replacement of these pumps and an increase in draft rate from 180,000 gpm to 190,000 gpm. The change results in a minor construction permit revision.

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

Project File: A complete project file is available for public inspection during normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (excluding holidays), at address indicated above for the Permitting Authority. The project file includes the Draft Permits, the Statement of Basis, the Technical Report and Preliminary Determination, the application, and the additional information submitted by the applicant, exclusive of confidential records under Section 306, F.S. Interested persons may contact the Permitting Authority's project manager for additional information at the address and phone number listed above. Draft permit documents can be viewed at http://www.dep.state.fl.us/air/eproducts/apds/default.asp.

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

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

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

Petitions: A person whose substantial interests are affected by the permitting decisions may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk, Office of General Counsel of the Department of Environmental Protection, 1700 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-0001; phone: 850/245-2241; Fax: 850/245-2303. Petitions filed by the applicant or the parties listed below must be filed within 14 days of receipt of this Draft Air Permit. Petitions filed by any persons other than the applicant or the parties listed below must be filed within 14 days of receipt of the attached Public Notice or within fourteen (14) days of receipt of the Draft Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for 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 address indicated above, at the time of filing. The failure of a person to file a petition within the appropriate time period shall constitute 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 this proceeding and participation as a party to it shall be subject to the rules of procedure for such proceedings.

Published Daily-Pensacola, Escambia County, FL

PROOF OF PUBLICATION

State of Florida

County of Escambia:

Before the undersigned authority personally appeared Claudia Wysocki-Ables who on oath, says that she is a personal representative of the Pensacola News Journal, a daily newspaper published in Escambia County, Florida; that the attached copy of advertisement, being a Legal in the matter of:

Notice of Intent

Was published in said newspaper in the issue(s) of:

October 17, 2007

Affiant further says that the said Pensacola News Journal is a newspaper published in said Escambia County, Florida, and that the said newspaper has heretofore been published in said Escambia County, Florida, and has been entered as second class matter at the Post Office in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this 17th Day of October, 2007, by CLAUDIA C. WYSOCKI-ABLES who is personally known to me.

Claudia Wysocki-Ables Affiant

Debra E. Nichols Notary Public

NIKKI E. NICHOLS Notary Public-State of FL Comm. Exp. Aug. 01, 2009 Comm. No. DD 427341

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection

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

Crist Electric Generating Plant
 Escambia County, Florida

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

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

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

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

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

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

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

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

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

BEST AVAILABLE COPY

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

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

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

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

Mediation: Mediation is not available in this proceeding.

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

Friday, Barbara

10/15/07

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

got it... thanks

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

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

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

 10/15/2007 03:22
 PM

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

 cc
 "Branum, Corrie"
 <Corrie.Branum@dep.state.fl.us>,
 "Adams, Patty"
 <Patty.Adams@dep.state.fl.us>
 Subject
 DRAFT Air Construction Permit
 Revision/Title V Permit Revision
 No.:
 0330045-019-AC/0330045-020-AV -
 Gulf Power Company - Crist
 Electric Generating Plant

Dear Sir/Madam:

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

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

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

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

Thank you,
DEP, Bureau of Air Regulation

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

Friday, Barbara

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

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

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

The following recipient(s) could not be reached:

tjmuccull@southernco.com on 10/15/2007 3:23 PM
There was a SMTP communication problem with the recipient's email server. Please contact your system administrator.
<tlhexsprot2.floridadep.net #5.5.0 smtp;550 Mailbox unavailable or access denied - <tjmuccull@southernco.com>>

Friday, Barbara

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

Cc: Branum, Corrie; Adams, Patty

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

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

Dear Sir/Madam:

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Thank you,

DEP, Bureau of Air Regulation

10/15/2007

Friday, Barbara

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

Your message

To: Gracy Danois; Kathleen Forney; Walker, Elizabeth (AIR)
Cc: Branum, Corrie
Subject: New Posting #0330045
Sent: 10/15/2007 3:20 PM

was read on 10/15/2007 3:23 PM.

Friday, Barbara

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

Your message

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

was delivered to the following recipient(s):

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

Friday, Barbara

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

Your message

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

was delivered to the following recipient(s):

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

Friday, Barbara

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

Your message

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

was delivered to the following recipient(s):

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

Friday, Barbara

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

Your message

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

was read on 10/15/2007 3:23 PM.

Friday, Barbara

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

Attachments: Delivery report; Message Headers



Delivery report.txt
(489 B)



Message
Headers.txt (2 KB)

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

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

The mail system

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

Friday, Barbara

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

Your message

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

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

Friday, Barbara

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

Your message

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

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

Friday, Barbara

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

Your message

To: GDWATERS@southernco.com
Subject:

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

Friday, Barbara

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

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

Dwain Waters, QEP

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

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

Dear Sir/Madam:

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

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Thank you,

DEP, Bureau of Air Regulation

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey <<http://survey.dep.state.fl.us/?refemail=Barbara.Friday@dep.state.fl.us>> . Thank you in advance for completing the survey.

Friday, Barbara

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

Your message

To: GNTERRY@southernco.com
Subject:

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

Friday, Barbara

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

Your message

To: PManuel@southernco.com
Subject:

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

Memorandum

Florida Department of Environmental Protection

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

Attached for your review are the following items:

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

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

Attachments

TV/clb



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

October 12, 2007

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

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

Dear Ms. Manuel:

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

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

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

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an
Application for Air Permit by:

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

Authorized Representative:
Penny Manuel, Vice President, Power Generation

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

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

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

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

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

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

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

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

Gulf Power Company
Crist Electric Generating Plant

Draft Air Permit No. 0330045-019-AC
Draft Air Permit No. 0330045-020-AV

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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

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

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

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

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

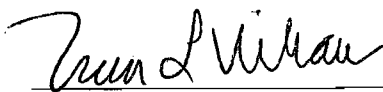
WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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

Mediation: Mediation is not available in this proceeding.

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

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

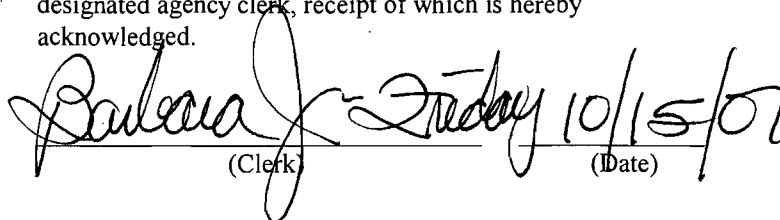
CERTIFICATE OF SERVICE

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

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

Clerk Stamp

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


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

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection

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

Crist Electric Generating Plant
Escambia County, Florida

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

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

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

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

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

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

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

Comments on the Draft Title V Air Operation Permit Revision: The Permitting Authority will accept written comments concerning the draft Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments received must be post-marked by the Permitting Authority at the above address by 5:00 p.m. on or before the end of the 30-day period. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on the Title V permitting action. If the Permitting Authority determines

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

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

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

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

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

Mediation: Mediation is not available in this proceeding.

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

(Public Notice to be Published in the Newspaper)

STATEMENT OF BASIS

FACILITY DESCRIPTION

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

PRIMARY REGULATORY REQUIREMENTS

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

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

PROJECT DESCRIPTION

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

CONCLUSION

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

DRAFT TITLE V PERMIT REVISION

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

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

E.U. ID No. Brief Description

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

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

EMISSIONS AND PERFORMANCE REQUIREMENTS

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

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

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

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



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

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

APPLICANT

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

COUNTY

Escambia County, Florida

PERMITTING AUTHORITY

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

October 10, 2007

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. GENERAL PROJECT INFORMATION

Facility Description and Location

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

Regulatory Categories

The facility is a major source of hazardous air pollutants.

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

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

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

Project Description

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

2. APPLICABLE REGULATIONS

State Regulations

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

Federal Regulations

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

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

3. PSD APPLICABILITY REVIEW

General PSD Applicability

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

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

PSD Applicability for the Project

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

4. DEPARTMENT'S PROJECT REVIEW

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

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

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

5. PRELIMINARY DETERMINATION

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

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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

DRAFT PERMIT

PERMITTEE:

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

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

Authorized Representative:

Penny Manuel
Vice President, Power Generation

PROJECT AND LOCATION

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

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

STATEMENT OF BASIS

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

APPENDICES

The following Appendix is attached as part of this permit.

Appendix GC Construction Permit General Conditions

(DRAFT)

Joseph Kahn, Director
Division of Air Resource Management

SECTION I. GENERAL INFORMATION (DRAFT)

FACILITY DESCRIPTION

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

PROJECT DESCRIPTION

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

REGULATORY CLASSIFICATION

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

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

SECTION II. ADMINISTRATIVE REQUIREMENTS (DRAFT)

GENERAL AND ADMINISTRATIVE REQUIREMENTS

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

SECTION III - EMISSIONS UNITS SPECIFIC CONDITIONS (DRAFT)

Cooling Tower (EU 014)

EMISSIONS UNITS

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

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

EQUIPMENT

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

EMISSIONS AND PERFORMANCE REQUIREMENTS

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

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

SECTION 4. APPENDIX GC
CONSTRUCTION PERMIT GENERAL CONDITIONS

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

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

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

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

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

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

SECTION 4. APPENDIX GC
CONSTRUCTION PERMIT GENERAL CONDITIONS

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

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

P.E. CERTIFICATION STATEMENT

PERMITTEE

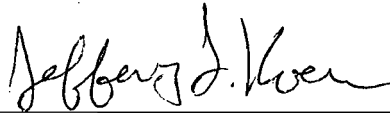
Gulf Power Company
Crist Electric Generating Plant
One Energy Place
Pensacola, Florida 32520

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

PROJECT DESCRIPTION

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

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



10-09-07

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

(Date)

One Energy Place
Pensacola, Florida 32520

850.505.5111

Certified Mail



September 21, 2007

Jeff Koerner, P.E.
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Koerner:

RE: CRIST ELECTRIC GENERATING PLANT
REVISED UNIT 7 COOLING TOWER REPLACEMENT PROJECT
PERMIT No: 0330045-014-AC

The purpose of this correspondence is to request a revision to the Crist Unit 7 Cooling Tower Air Construction Permit and its Title V incorporation. As you are aware, Gulf Power is in the process of designing a Wet Flue Gas Desulphurization (WFGD) scrubber system at Plant Crist to comply with future CAIR and CAMR regulation. The conceptual plot plan required Gulf to construct a new Unit 7 Cooling Tower to accommodate the installation of the new scrubber system. This system was constructed pursuant to the above referenced permit and began service in April, 2007. After startup, Gulf became aware that the circulating water pumps associated with the tower are undersized and are operating at a higher electrical load than the pump specifications allowed causing concern with unit failure. Thus, Gulf plans to upgrade the Crist Unit 7 circulating water pumps from the current permitted capacity of 180,000 to 190,000 gallons per minute in November, 2007. Analysis of this upgrade does not significantly impact the previous submitted emissions estimates.

Please find attached an original and three copies of concurrent air construction and Title V permit applications for the Crist Unit 7 Cooling Tower Relocation Project.

If you have any questions regarding the Crist Unit 7 Cooling Tower Relocation Project or the protocol development for the Crist scrubber project, please call me at (850) 444.6527.

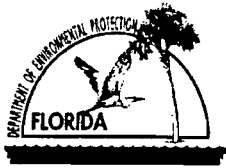
Sincerely,

A handwritten signature in black ink that reads "Dwain Waters, Q.E.P.".

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

Mr. Jeff Koerner, P.E.
Crist Unit 7 Cooling Tower Replacement Project
September 21, 2007
Page 2

cc: w/att: Jim Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Jay Weston, Gulf Power Company
David Hollinger, Southern Company
Angela Morrison, Hopping, Green & Sams
Rick Bradburn, FDEP Northwest District Office, Pensacola, Florida



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for any air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial/revise/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Gulf Power Company	
2. Site Name: Crist Electric Generating Plant	
3. Facility Identification Number: 0330045	
4. Facility Location... Street Address or Other Locator: Pate Road (Off of 10 Mile Road) City: Pensacola County: Escambia Zip Code: 32520	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: G. Dwain Waters	
2. Application Contact Mailing Address... Organization/Firm: Gulf Power Street Address: One Energy Place City: Pensacola State: FL Zip Code: 32520-0329	
3. Application Contact Telephone Numbers... Telephone: (850) 444 - 6527 ext. Fax: (850) 444 - 6217	
4. Application Contact Email Address: gdwaters@southernco.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 9/25/09	3. PSD Number (if applicable):
2. Project Number(s): 0330045-019-AC 0330045-020-AV	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Gulf Power is seeking to revise the air construction permit 0330045-014-AC to upgrade the cooling tower pumps from 180k to 190k gallons per minute pursuant to load conditions on the current pump motors operating higher than specification which may cause failure.

APPLICATION INFORMATION

The purpose of this application is to request a construction permit for the relocation of the Crist Unit 7 Cooling Tower. Gulf Power is in the process of designing a Wet Flue Gas Desulphurization (WFGD) scrubber system at Plant Crist to comply with future CAIR and CAMR regulation. The conceptual design plot plan reveals that the present Unit 7 Cooling Tower must be removed to accommodate the installation of the new scrubber system. A new more efficient Unit 7 Cooling Tower is being proposed as a replacement. The proposed replacement tower will be slightly larger (12 to 14 cells) and will include a drift elimination system to reduce particulate emissions. With the new tower design capability there will be a reduction of actual to potential PM and PM-10 emissions of approximately 8978 (revised from 8980) and 449 tons per year, respectively. Crist Unit 7 unit is projected to experience a heat rate improvement of less than 1% during the summer months due to the more efficient thermal system but this slight change in heat rate will not impact the plant dispatch or load capability of the unit. The basic design of the cooling system for Crist Unit 7 will remain the same as a closed loop system. The new tower is a standard forced draft design available in today's market. The original construction was completed in April, 2007 under 0330045-014-AC. However, due to electrical load concerns with the original installed pump motors, Gulf is requesting an upgrade from 180k to 190k gallons per minute. The upgrade is scheduled for November, 2007.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
012	Cooling Tower (3)		

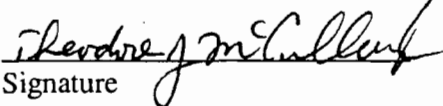
Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Theodore J. McCullough
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Gulf Power Company Street Address: One Energy Place City: Pensacola State: Florida Zip Code: 32520-0100
3. Owner/Authorized Representative Telephone Numbers... Telephone: (850) 444 - 6383 ext. Fax: (850) 444 - 6744
4. Owner/Authorized Representative Email Address: <u>TJMUCCULL@southernco.com</u>
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i>  Signature <u>9/20/07</u> Date

APPLICATION INFORMATION

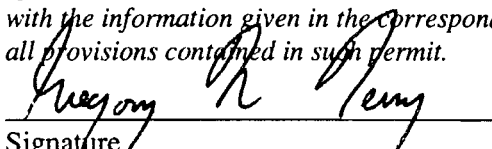
Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Theodore J. McCullough
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Gulf Power Company Street Address: One Energy Place City: Pensacola State: Florida Zip Code: 32520-0100
4. Application Responsible Official Telephone Numbers... Telephone: (850) 444 - 6383 ext. Fax: (850) 444 - 6744
5. Application Responsible Official Email Address: <u>TJMUCCULL@southernco.com</u>
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i> Signature <u>Theodore J. McCullough</u> Date <u>9/20/07</u>

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Registration Number: Gregory N. Terry
2. Professional Engineer Mailing Address... Organization/Firm: Gulf Power Company Street Address: One Energy Place City: Pensacola State: Florida Zip Code: 32520-0340
3. Professional Engineer Telephone Numbers... Telephone: (850) 429 - 2381 ext. Fax: (850) 429 - 2246
4. Professional Engineer Email Address: <u>GNTERRY@southernco.com</u>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> (1) <i>To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> (2) <i>To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> (3) <i>If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> (4) <i>If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> (5) <i>If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature _____ Date <u>9/18/2007</u> (seal)

* Attach any exception to certification statement.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 16 East (km) 478.27 North (km) 3381.36		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 30 33 58 Longitude (DD/MM/SS) 87 13 44	
3. Governmental Facility Code: O	4. Facility Status Code: A	5. Facility Major Group SIC Code: 49	6. Facility SIC(s): 4911
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: G. Dwain Waters
2. Facility Contact Mailing Address... Organization/Firm : Gulf Power Company Street Address: One Energy Place City: Pensacola State: Florida Zip Code: 32520-0329
3. Facility Contact Telephone Numbers: Telephone: (850) 444 - 6527 ext. Fax: (850) 444 - 6217
4. Facility Contact Email Address: gdwaters@southernco.com

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
4. Facility Primary Responsible Official Email Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
No change from Previous Title V application.		

FACILITY INFORMATION

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
NOx					Agreement

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

Plant Crist has a facility wide NOx Emissions Rate limit per the Gulf – FDEP Ozone Agreement in 2002. The NOx Emissions Cap does not affect this construction application.

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <u>Crist Plot Plan</u> <input type="checkbox"/> Previously Submitted, Date: _____
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>06/22/2004</u>
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>06/22/2004</u>

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input checked="" type="checkbox"/> Attached, Document ID: <u>Crist 7 Tower</u>
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: <u>Crist Rule</u>
4. List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [1] of [1]

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [1] of [1]

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section: Crist Unit 7 Cooling Tower is an unregulated emissions unit with possible particulate emissions.

3. Emissions Unit Identification Number: 012

4. Emissions Unit Status Code: C	5. Commence Construction Date: 11/01/2007	6. Initial Startup Date: 04/15/2007	7. Emissions Unit Major Group SIC Code: 49	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
-------------------------------------	--	--	---	--

9. Package Unit: NA
Manufacturer: _____ Model Number: _____

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment: Unit is an unregulated emissions unit. The above referenced item 5 is the revised commence construction date to upgrade the cooling tower pump capacity from 180 to 190k gallons per minute. The original construction date for the project was 07/01/2006.

EMISSIONS UNIT INFORMATION

Section [1] of [1]

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:
Drift Eliminators rated at .0005%

2. Control Device or Method Code(s) : 152: Mist Eliminator

EMISSIONS UNIT INFORMATION

Section [1] of [1]

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: 190000 Gallons Per Minute
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8760 hours/year
6. Operating Capacity/Schedule Comment: The capacity throughput rate in item 1. was upgraded from 180k to 190k gallons per minute. This is a design rated capacity at + and - 10%.

EMISSIONS UNIT INFORMATION

Section [1] of [1]

C. EMISSION POINT (STACK/VENT) INFORMATION
 (Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: Cooling Tower		2. Emission Point Type Code: 4: No True Emission Point	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: F: No Stack	6. Stack Height: Feet	7. Exit Diameter: Feet	
8. Exit Temperature: 115 °F	9. Actual Volumetric Flow Rate: Acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: Dscfm		12. Nonstack Emission Point Height: 68 Feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: Temperature in item #8 is estimated based on design and wet bulb calculations for mid-summer.			

EMISSIONS UNIT INFORMATION

Section [1] of [1]

D. SEGMENT (PROCESS/FUEL) INFORMATION**Segment Description and Rate:** Segment 1 of 1

1. Segment Description (Process/Fuel Type): Cooling Tower		
2. Source Classification Code (SCC): 3-90-900-04	3. SCC Units: Million Gallons Cooling Water Throughput	
4. Maximum Hourly Rate: 11.4	5. Maximum Annual Rate: 99864	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: Non-regulated emissions unit. Item 4. revised from 10.8 Item 5. revised from 94608		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

EMISSIONS UNIT INFORMATION

Section [1] of [1]

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM			NS
PM 10			NS

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 6.99 lb/hour 30.6 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 6.99 lbs/hr Reference: AP-42, Section 13.4		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $(190,000 \text{ gal/min}) * (.0005 \text{ gal/drift/100 gal flow}) * (14,700 \text{ lb PM/Million lb/water}) * (8.345 \text{ lb/gal water}) * 60 \text{ min/hr} = 6.99 \text{ lb/hr}$ $(6.99 \text{ lb/hr}) * (8760 \text{ Hr/Yr}) * (1 \text{ ton} / 2000 \text{ lb}) = 30.6 \text{ tons/yr} *$ * Total PM estimated using maximum daily TDS data. Item 3. revised from 6.62 to 6.99 lb/hr and 29 tons to 30.6 tons due to upgrade in flow capacity from 180k to 190k gallons per minute.			
11. Potential, Fugitive, and Actual Emissions Comment: Emissions are based on maximum TDS measured at plant intake water.			

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM 10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.33 lb/hour 1.45 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.33 lb/hr Reference: AP-42 and Greystone Environmental Consultants Abstract No. 216		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): 1.45 tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Total PM = (190,000 gall/min) * (.0005 gal/drift/100 gal flow) * (14,700 lb PM/Million lb/water) * (8.345 lb/gal water) * 60 min/hr = 6.99 lb/hr Based on Abstract "Calculating Realistic PM 10 Emissions from Cooling Tower" by Joel Reisman and Gordon Fribie the PM-10 fraction is less than 5% at TDS levels greater than 12000 ppm. Thus; PM10 = 6.99 lb/hr * .05 = 0.35 lb/hr PM 10 Annual = (0.35 lb/hr) * (8760 Hr/Yr) * (1ton /2000 lb) = 1.53 tons/yr			
11. Potential, Fugitive, and Actual Emissions Comment: Based on Abstract "Calculating Realistic PM 10 Emissions from Cooling Tower" by Joel Reisman and Gordon Fribie the PM-10 fraction is less than 5% at TDS levels greater than 12000 ppm. Item 10. revised from .33 lb/hr and 1.44 ton/yr to .35 lb/hr and 1.53 ton/yr, respectively due to upgrade from 180k to 190k gallons per minute capacity.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	

6. Allowable Emissions Comment (Description of Operating Method):
This unit is an unregulated emissions unit.

EMISSIONS UNIT INFORMATION

Section [1] of [1]

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation ___ of ___

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation ___ of ___

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment: This is an unregulated emissions unit.	

EMISSIONS UNIT INFORMATION
Section [1] of [1]

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: This is an unregulated emissions unit.	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>06/22/2004</u>
2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>06/22/2004</u>
3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>06/22/2004</u>
4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>06/22/2004</u> <input type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input checked="" type="checkbox"/> Attached, Document ID: <u>Cooling Tower Certification</u> Test Date(s)/Pollutant(s) Tested: <u>Permittee submitted certification of drift elimination by contractor on 04/30/07.</u> <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable <p>Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.</p>
7. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION
Section [1] of [1]

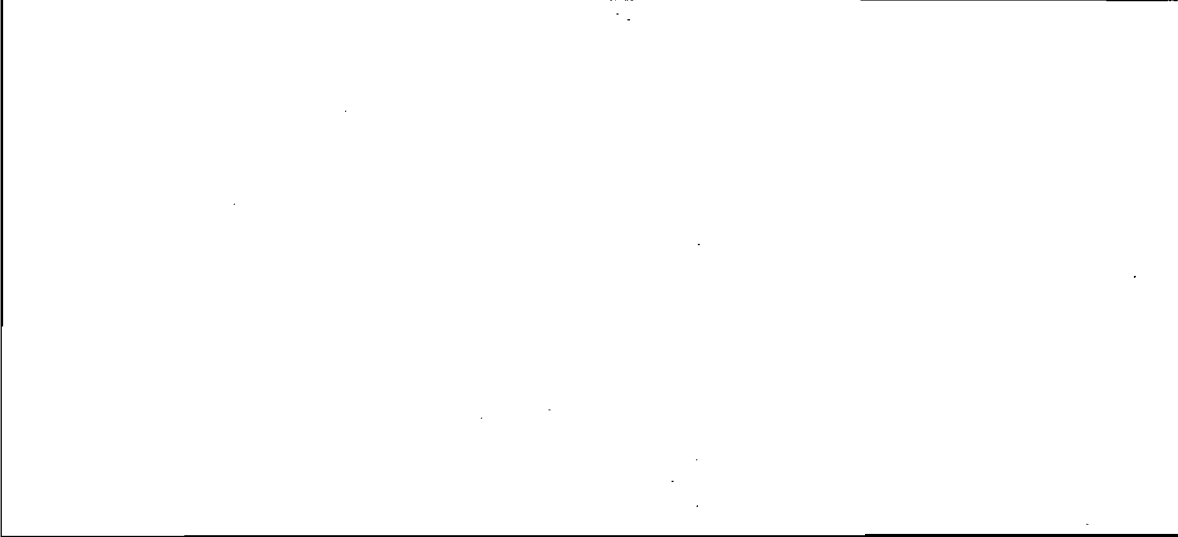
Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(4)(d), F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Not Applicable

Additional Requirements Comment



ATTACHMENT: CRIST RULE

FDEP Rule	GULF POWER - CRIST FACILITY FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
<p>"This list includes only those applicable requirements typically associated with an electric power plant. For example, NSPS Subpart O for sewage treatment plants has not been included. If rules other than those listed herein apply to your source, they should be included in your source's application even if they are not listed below. ^bPlease refer to HGSS's June 6, 1995 memorandum explaining how this list was developed and how applicable requirements should be addressed in an application.</p>						
Chapter 62-4 Permits						
62-4.030	General Prohibition.	0330045	✓		State Only	Facility
62-4.040(1)	Exemptions	0330045	✓		State Only	Facility
62-4.100	Suspension and Revocation.	0330045	✓		State Only	Facility
62-4.130	Plant Operation - Problems.	0330045	✓		State Only	Facility
Chapter 62-204 State Implementation Plan						
62-204.800 (11)	Adoption of 40 CFR 70, Federal Title V Rule	0330045	✓		State only.	Facility
62-204.800 (19)	Adoption of 40 CFR 82, Stratospheric Ozone	0330045	✓		State only.	Facility
Chapter 62-210 Stationary Sources - General Requirements						
62-210.300	Permits Required.					
	(2) Air Operation Permits. (Except (b))	0330045	✓			Facility
	(3)(a) Exemptions - #1-29.	0330045	✓			Facility
	(3)(b) Temporary Exemptions.	0330045	✓			Facility
62-210.300	(5) Notification of Startup. The owners or operator of any emissions unit or facility which has a valid air operation permit which has been shut down more than one year, shall notify the Department in writing of the intent to start up such emissions unit or facility, a minimum of 60 days prior to the intended startup date.	0330045	✓		May apply in the future.	Facility
	(a) The notification shall include information as to the startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.	0330045	✓		May apply in the future.	Facility
	(b) If, due to an emergency, a startup date is not known 60 days	0330045	✓		May apply in the future.	Facility

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FDEP Rule	GULF POWER - CRIST FACILITY FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
	prior thereto, the owner shall notify the Department as soon as possible after the date of such startup is ascertained.					
62-210.370	Reports.					
	(3) Annual Operating Report for Air Pollutant Emitting Facility.	0330045	✓			Facility
62-210.900	Forms and Instructions.	0330045	✓			Facility
	(5) Annual Operating Reports	0330045	✓			Facility
Chapter 62-213 Operation Permits for Major Sources of Air Pollution						
62-213.205	Annual Emissions Fee.	0330045	✓			Facility
62-213.400	Permits and Permit Revisions Required.	0330045	✓			Facility
62-213.410	Changes Without Permit Revision.	0330045	✓			Facility
62-213.415	Trading of Emissions Within a Source.	0330045	✓		May apply in the future.	Facility
62-213.460	Permit Shield.	0330045	✓			Facility
Chapter 62-252 Gasoline Vapor Control						
62-252.300	Gasoline Dispensing Facilities - Stage I Vapor Recovery.					
	(2) Prohibition.	0330045				Facility
	(3) Control Technology Requirements.	0330045				Facility
	(4) Compliance Schedule.	0330045			State Only	Facility
62-252.400	Gasoline Dispensing Facilities - Stage II Vapor Recovery.					
	(2) Prohibition.	0330045			State Only	Facility
	(3) Control Technology Requirements.	0330045			State Only	Facility
	(4) Compliance Schedules.	0330045			State Only	Facility
	(5) Testing.	0330045			State Only	Facility

FDEP Rule	GULF POWER - CRIST FACILITY FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
	(6) Recordkeeping.	0330045			State Only	Facility
	(7) System Maintenance.	0330045			State Only	Facility
62-252.400	(8) Training.	0330045			State Only	Facility
62-252.500	Gasoline Tanker Trucks.					
	(2) Prohibitions.	0330045			State Only	Facility
	(3) Leak Testing.	0330045			State Only	Facility
Chapter 62-256 Open Burning and Frost Protection Fires						
62-256.300	Prohibitions.	0330045	✓		State Only	Facility
62-256.450	Burning for Cold or Frost Protection.	0330045			State Only	Facility
62-256.500	Land Clearing.	0330045	✓		State Only	Facility
62-256.600	Industrial, Commercial, Municipal, and Research Open Burning.	0330045	✓		State Only	Facility
62-256.700	Open Burning Allowed.	0330045	✓		State Only	Facility
Chapter 62-257 Asbestos Removal						
62-257.301	Notification Procedure and Fee.	0330045	✓		State Only	Facility
62-257.400	Fee Schedule.	0330045	✓		State Only	Facility
62-257.900	Form.	0330045	✓		State Only	Facility
Chapter 62-281 Motor Vehicle Air Conditioning Refrigerant Recovery and Recycling.						
62-281.300	Applicability.	0330045			State Only	Facility
62-281.400	Compliance Requirements.	0330045			State Only	Facility
62-281.500	Establishment Certification.					
	(1) Initial Certification.	0330045			State Only	Facility
	(2) Renewal Certification.	0330045			State Only	Facility

FDEP Rule	GULF POWER - CRIST FACILITY FDEP APPLICABLE REQUIREMENTS LIST FDEP Title	Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
	(3) Fees.	0330045			State Only	Facility
	(4) Certificate of Compliance.	0330045			State Only	Facility
62-281.600	Training Requirements.	0330045			State Only	Facility
62-281.700	Equipment Certification.	0330045			State Only	Facility
62-281.900	Forms.	0330045			State Only	Facility
Chapter 62-296 Stationary Sources – Emission Standards						
62-296.320	General Pollutant Emission Limiting Standards.					
	(1) Volatile organic compounds emissions or organic solvents emissions.	0330045		-		Facility
	(2) Objectionable Odor Prohibited.	0330045	✓			Facility
	(3) Open Burning.	0330045	✓		State Only	Facility
	(4)(b) General Visible Emissions Standard.	0330045	✓			Facility
	(4)(c) Unconfined Emissions of Particulate Matter.	0330045	✓			Facility

EPA Rule	GULF POWER - CRIST FACILITY EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
<p>^aThis list includes only those applicable requirements typically associated with an electric power plant. For example, NSPS Subpart O for sewage treatment plants has not been included. If rules other than those listed herein apply to your source, they should be included in your source's application even if they are not listed below.</p> <p>^bPlease refer to HGSS's June 6, 1995 memorandum explaining how this list was developed and how applicable requirements should be addressed in an application.</p>						
Part 61 - EPA Regulations on National Emission Standards for Hazardous Air Pollutants						
Subpart A - General Provisions						
61.05	Prohibited Activities.	0330045	✓			Facility
61.09	Notification of Startup.	0330045				Facility
61.10	Source Reporting and Request for Waiver of Compliance.	0330045				Facility
61.11	Waiver of Compliance.	0330045				Facility
61.12 (b)	Compliance with Standards and Maintenance Requirements.	0330045	✓			Facility
61.13	Emission Tests and Waiver of Emission Tests.	0330045				Facility
61.14	Monitoring Requirements.	0330445				Facility
61.19	Circumvention.	0330045				Facility
Subpart M — National Emission Standards for Asbestos		0330045	✓			Facility
Appendix C to Part 61 — Quality Assurance Procedures		0330045	✓			Facility
EPA Part 82 - Protection Of Stratospheric Ozone						
Subpart B - Servicing of Motor Vehicle Air Conditioners						
82.34	Prohibitions.	0330045	✓			Facility
82.36	Approved refrigerant recycling equipment.	0330045	✓			Facility
82.38	Approved independent standards testing organizations.	0330045	✓			Facility
82.40	Technician training and certification.	0330045	✓			Facility
82.42	Certification, recordkeeping and public notification requirements.	0330045	✓			Facility

EPA Rule	GULF POWER - CRIST FACILITY EPA APPLICABLE REQUIREMENTS LIST EPA Title	(AIRS) Facility Emission Unit Identification Number(s)	Applicable Requirement		Comments/Discussion	Unit/Facility Potential Applicability
			Yes	No/NA		
Subpart F - Recycling and Emissions Reduction						
82.154	Prohibitions.	0330045	✓			Facility
82.156	Required practice.	0330045	✓			Facility
82.158	Standards for recycling and recovery equipment.	0330045	✓			Facility
82.160	Approved equipment testing organizations.	0330045	✓			Facility
82.161	Technician certification.	0330045	✓			Facility
82.162	Certification by owners of recovery and recycling equipment.	0330045	✓			Facility
82.164	Reclaimer certification.	0330045	✓			Facility
82.166 (k) (m)	Reporting and recordkeeping requirements for owners/operators.	0330045	✓			Facility
40 CFR 279.72	Used Oil Regulations	0330045	✓		Facility burns on-spec used oil.	Facility

Title V Core List

Effective: 03/01/02

[Note: The Title V Core List is meant to simplify the completion of the "List of Applicable Regulations" for DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced in its entirety, or with specific exceptions. The Department may periodically update the Title V Core List.]

Federal: (description)

40 CFR 61, Subpart M: NESHAP for Asbestos.

40 CFR 82: Protection of Stratospheric Ozone.

40 CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).

40 CFR 82, Subpart F: Recycling and Emissions Reduction.

State: (description)

CHAPTER 62-4, F.A.C.: PERMITS, effective 06-01-01

62-4.030, F.A.C.: General Prohibition.

62-4.040, F.A.C.: Exemptions.

62-4.050, F.A.C.: Procedure to Obtain Permits; Application.

62-4.060, F.A.C.: Consultation.

62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.

62-4.080, F.A.C.: Modification of Permit Conditions.

62-4.090, F.A.C.: Renewals.

62-4.100, F.A.C.: Suspension and Revocation.

62-4.110, F.A.C.: Financial Responsibility.

62-4.120, F.A.C.: Transfer of Permits.

62-4.130, F.A.C.: Plant Operation - Problems.

62-4.150, F.A.C.: Review.

62-4.160, F.A.C.: Permit Conditions.

62-4.210, F.A.C.: Construction Permits.

62-4.220, F.A.C.: Operation Permit for New Sources.

CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 06-21-01

62-210.300, F.A.C.: Permits Required.

62-210.300(1), F.A.C.: Air Construction Permits.

62-210.300(2), F.A.C.: Air Operation Permits.

62-210.300(3), F.A.C.: Exemptions.

62-210.300(5), F.A.C.: Notification of Startup.

62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.300(7), F.A.C.: Transfer of Air Permits.

Title V Core List

Effective: 03/01/02

- 62-210.350, F.A.C.: Public Notice and Comment.
- 62-210.350(1), F.A.C.: Public Notice of Proposed Agency Action.
- 62-210.350(2), F.A.C.: Additional Public Notice Requirements for Emissions Units Subject to Prevention of Significant Deterioration or Nonattainment-Area Preconstruction Review.
- 62-210.350(3), F.A.C.: Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources.

- 62-210.360, F.A.C.: Administrative Permit Corrections.
- 62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
- 62-210.400, F.A.C.: Emission Estimates.
- 62-210.650, F.A.C.: Circumvention.
- 62-210.700, F.A.C.: Excess Emissions.

- 62-210.900, F.A.C.: Forms and Instructions.
- 62-210.900(1), F.A.C.: Application for Air Permit – Title V Source, Form and Instructions.
- 62-210.900(5), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.
- 62-210.900(7), F.A.C.: Application for Transfer of Air Permit – Title V and Non-Title V Source.

CHAPTER 62-212, F.A.C.: STATIONARY SOURCES - PRECONSTRUCTION REVIEW, effective 08-17-00

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 04-16-01

- 62-213.205, F.A.C.: Annual Emissions Fee.
 - 62-213.400, F.A.C.: Permits and Permit Revisions Required.
 - 62-213.410, F.A.C.: Changes Without Permit Revision.
 - 62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.
 - 62-213.415, F.A.C.: Trading of Emissions Within a Source.
 - 62-213.420, F.A.C.: Permit Applications.
 - 62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.
 - 62-213.440, F.A.C.: Permit Content.
 - 62-213.450, F.A.C.: Permit Review by EPA and Affected States
 - 62-213.460, F.A.C.: Permit Shield.
-
- 62-213.900, F.A.C.: Forms and Instructions.
 - 62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form.
 - 62-213.900(7), F.A.C.: Statement of Compliance Form.

Title V Core List

Effective: 03/01/02

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS, effective 03-02-99

62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter.

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.

CHAPTER 62-297, F.A.C.: STATIONARY SOURCES - EMISSIONS MONITORING, effective 03-02-99

62-297.310, F.A.C.: General Test Requirements.

62-297.330, F.A.C.: Applicable Test Procedures.

62-297.340, F.A.C.: Frequency of Compliance Tests.

62-297.345, F.A.C.: Stack Sampling Facilities Provided by the Owner of an Emissions
Unit.

62-297.350, F.A.C.: Determination of Process Variables.

62-297.570, F.A.C.: Test Report.

62-297.620, F.A.C.: Exceptions and Approval of Alternate Procedures and Requirements.

Miscellaneous:

CHAPTER 28-106, F.A.C.: Decisions Determining Substantial Interests

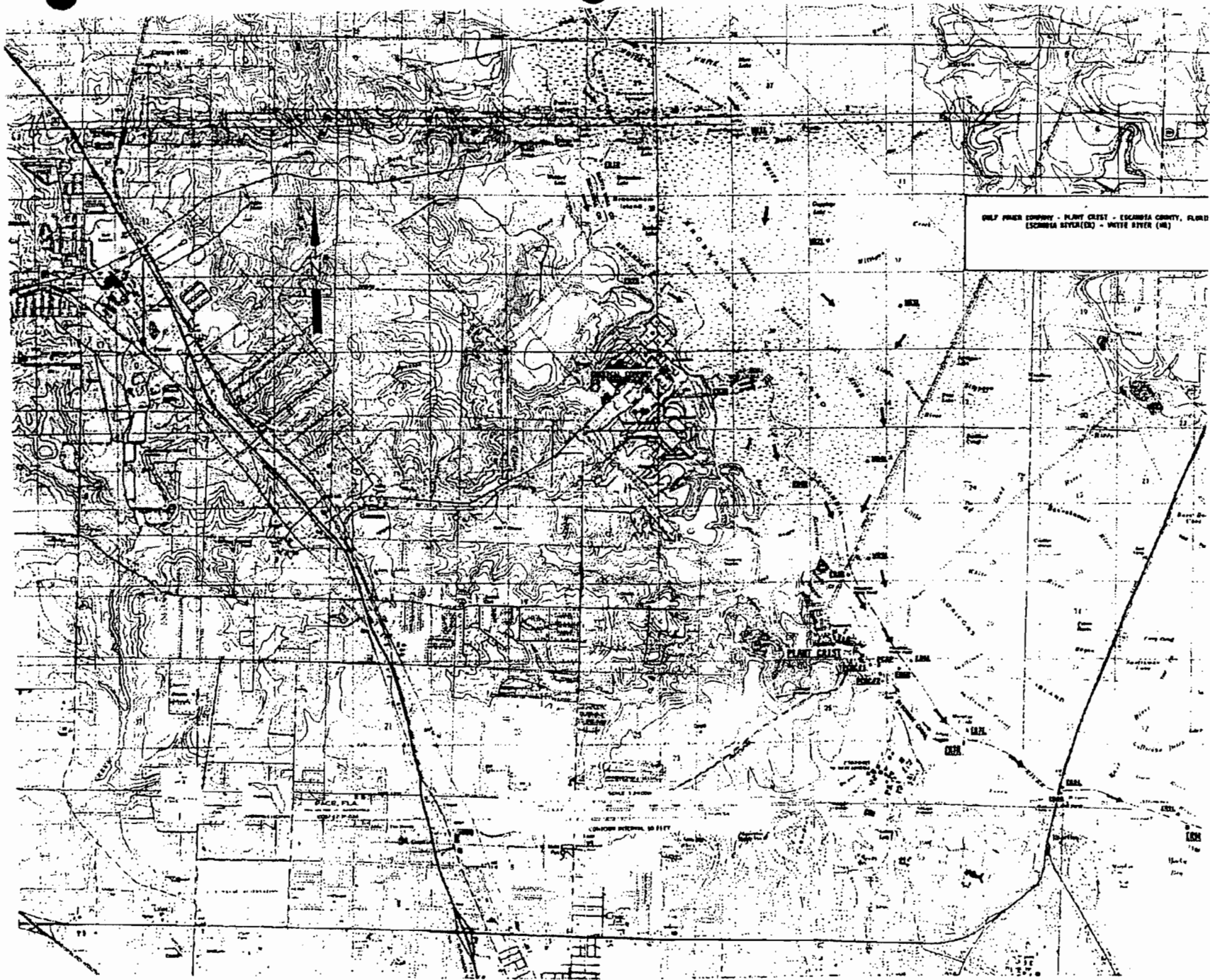
CHAPTER 62-110, F.A.C.: Exception to the Uniform Rules of Procedure, effective
07-01-98

CHAPTER 62-256, F.A.C.: Open Burning and Frost Protection Fires, effective 11-30-94

CHAPTER 62-257, F.A.C.: Asbestos Notification and Fee, effective 02-09-99

**CHAPTER 62-281, F.A.C.: Motor Vehicle Air Conditioning Refrigerant Recovery and
Recycling,** effective 09-10-96

ATTACHMENT: CRIST PLOT PLAN



WOLF PACKER COMPANY - PLANT CREST - ESCAMBIA COUNTY, FLORIDA
ESCAMBIA RIVER (OK) - WHITE RIVER (AK)

Contour
Interval
100'

Scale
1" = 100'

North
Arrow

Grid
Coordinates

Spot
Elevations

Water
Courses

Boundaries

Buildings

Vegetation

Other
Features

Legend

Index

Notes

Remarks

Drawn
by

Checked
by

Date

Sheet

of

Total

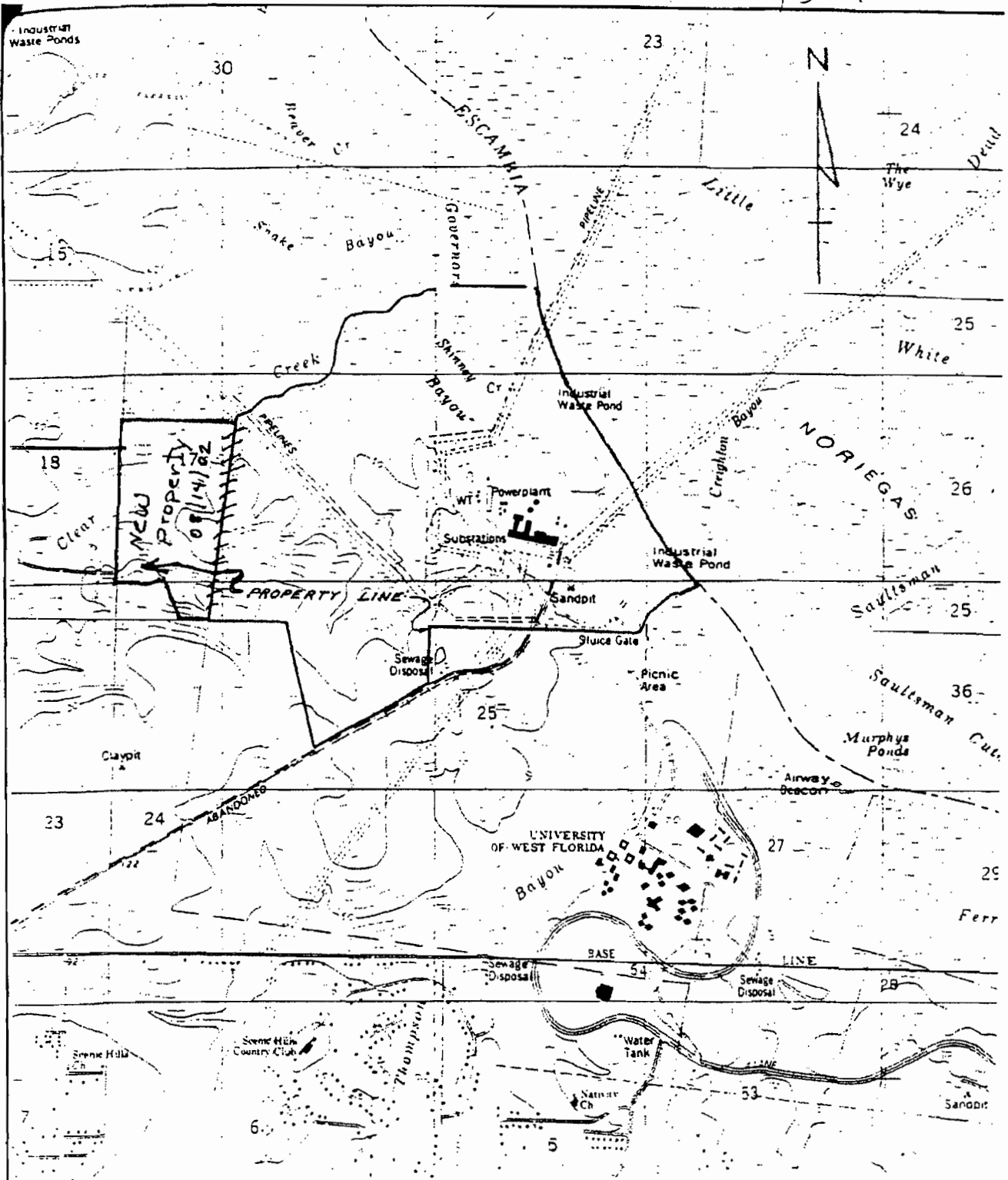
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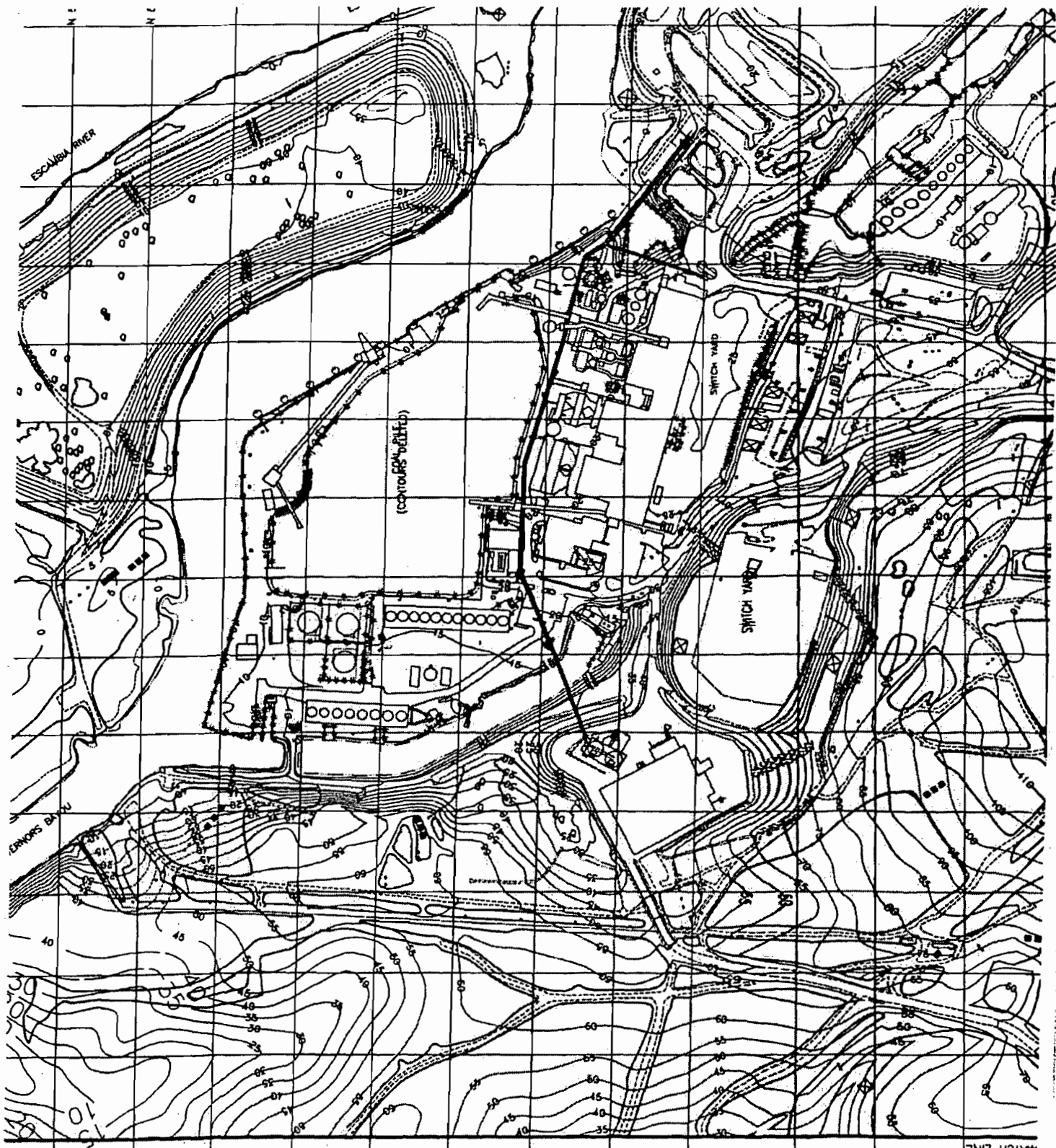
Project

GULF POWER COMPANY

15 1



DR. <i>Red</i>	SUBJECT CRIST ELECTRIC GENERATING PLANT	
TR.	DETAIL PROPERTY LINES	
DATE 11-13-80 updated 08/14/02	SCALE 1:24,000	SH. OF SHEETS A-4237



MATCH LINE

FOR CONTINUATION SEE DWG ERS-3016-140

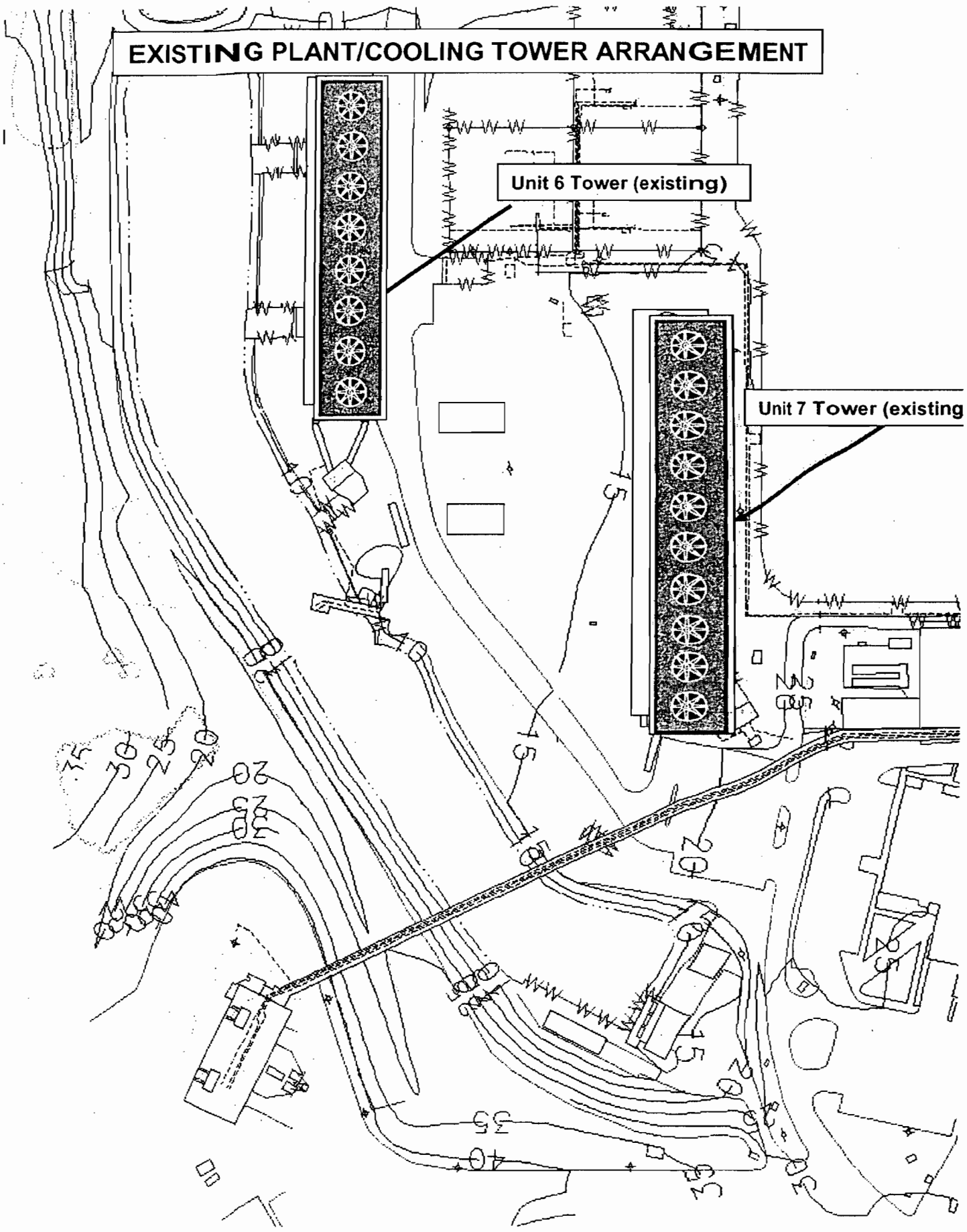
Plant Crest pre SCR, ESP
and Cooling Tower Relocation
2005

- N 581250
- N 581000
- N 580750
- N 580500
- N 580250
- N 580000
- N 579750

EXISTING PLANT/COOLING TOWER ARRANGEMENT

Unit 6 Tower (existing)

Unit 7 Tower (existing)



UNIT 7 COUNTERFLOW COOLING TOWER ARRANGEMENT

Unit 6 Tower (existing)

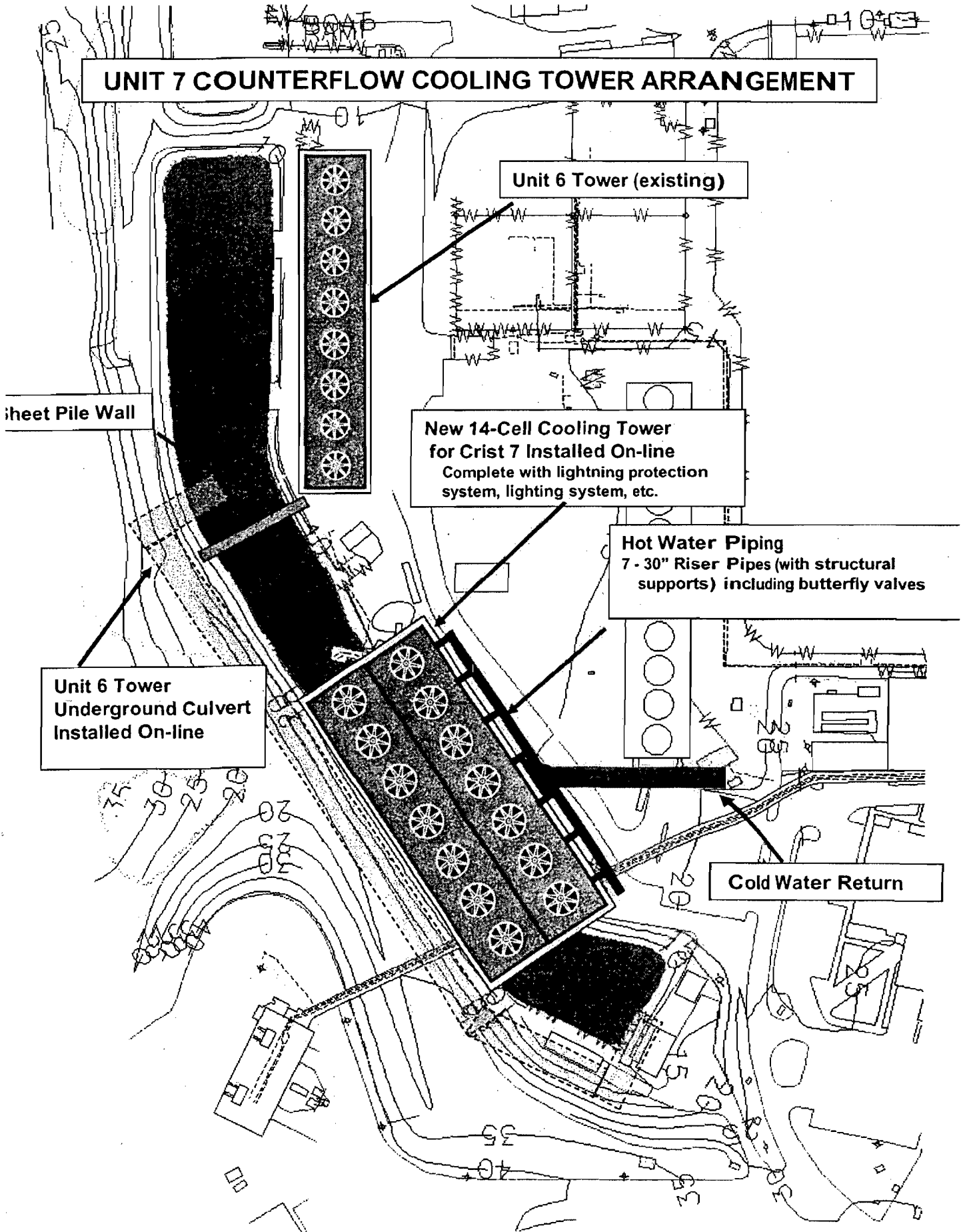
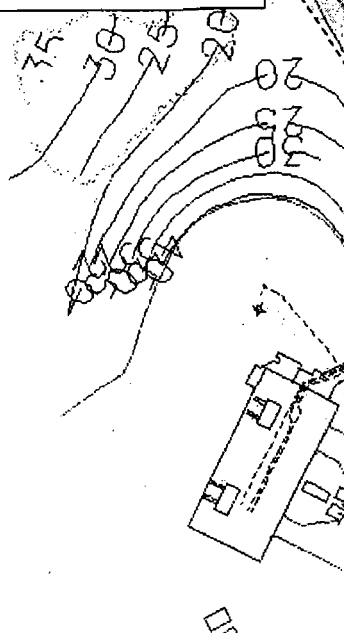
New 14-Cell Cooling Tower
for Crist 7 Installed On-line
Complete with lightning protection
system, lighting system, etc.

Hot Water Piping
7 - 30" Riser Pipes (with structural
supports) including butterfly valves

Unit 6 Tower
Underground Culvert
Installed On-line

Cold Water Return

Sheet Pile Wall



ATTACHMENT: CRIST 7 TOWER

REVISED PROJECT DESCRIPTION: Crist Unit 7 Cooling Tower Replacement (09/12/07)

Gulf Power is in the process of designing a Wet Flue Gas Desulphurization (WFGD) scrubber system at Plant Crist to comply with future CAIR and CAMR regulation. The conceptual design plot plan reveals that the present Unit 7 Cooling Tower must be removed to accommodate the installation of the new scrubber system. A new more efficient Unit 7 Cooling Tower is being proposed as a replacement. The proposed replacement tower will be slightly larger (12 to 14 cells) and will include a drift elimination system to reduce particulate emissions. With the new tower design capability there will be a reduction of actual to potential PM and PM-10 emissions of approximately 8978 and 449 tons per year, respectively. Crist Unit 7 unit is projected to experience a heat rate improvement of less than 1% during the summer months due to the more efficient thermal system but this slight change in heat rate will not impact the plant dispatch or load capability of the unit. The basic design of the cooling system for Crist Unit 7 will remain the same as a closed loop system. The new tower is a standard forced draft design available in today's market. Site preparation will begin in June, 2006. Construction is projected to begin in July, 2006 with startup earmarked for April 15, 2007. The original flow permitted in 2006 was designed at 180k gallons per minute. An upgrade of the pumps to supply 190k gallons per minute is planned for November, 2007. Below are the revised design specifications for the Crist Unit 7 Cooling Tower:

Design Conditions:	Flow	190,000 gal/min (+/- 10%)
	Hot Water	121 degrees F.
	Cold Water	88 degrees F.
	Wet Bulb	80 degrees F.
	Exit Gas Temperature	115 degrees F.
Tower Description:	Model	NA
	Number of Cells	14
	Pump Head	42.1 ft.
	Fan Diameter	32.8 ft.
	Motor Size	14@ 200 hp
	Brake Horsepower	14@ 200 hp
	Evaporation	not specified
	Drift Rate	.0005 %
Tower Dimension:	Tower Width	105.0 +/- 5% ft.
	Tower Length	367.5 +/- 5% ft.
	Tower Height	68.0 +/- 5% ft.
	Fan Deck Height	55.0 +/- 5% ft.
Basin Dimension:	Basin Width	125.0 +/- 5% ft.
	Basin Length	370.0 +/- 5% ft.

Crist 7 Cooling Tower Netting Analysis Revised (09/12/07)

Old Crist 7 Cooling Tower Baseline Calculation

Assumptions: 165k gallons flow/min; drift = 0.2%; Max TDS = 14,700 ppm @ 5% PM10 fraction ; Avg TDS = 1935 ppm @ 60% PM10 fraction

Maximum Past Actual Particulate

Max PM lb/hr = 165,000 gal/min * 0.2 gal drift/100 gall flow * 14,700 lb PM/ million lbs H2O * 8.345 lb/gal H2O * 60 min/hr = **2428.9**

Max PM10 lb/hr = PM hr * 5% fraction = **121.44 lb/hr**

Year	Hours of Operation	Max	Max
		PM annual Tons/Yr	PM10 annual Tons/Yr
2001	6621	8040.9	402.0
2002	6891	8368.8	418.4
2003	7945	9648.8	482.4
2004	6243	7581.8	379.1
2005	6013	7302.5	365.1
Avg	6742.6	8188.5	409.4
Highest 24 month Avg	7418	9008.8	450.4

Average Past Actual Particulate

Avg PM lb/hr = 165,000 gal/min * 0.2 gal drift/100 gall flow * 1935 lb PM/ million lbs H2O * 8.345 lb/gal H2O * 60 min/hr = **319.7**

Avg PM10 lb/hr = PM hr * 60% fraction = **191.83 lb/hr**

Year	Hours of Operation	Avg	Avg
		PM annual Tons/Yr	PM10 annual Tons/Yr
2001	6621	1058.4	635.1
2002	6891	1101.6	661.0
2003	7945	1270.1	762.1
2004	6243	998.0	598.8
2005	6013	961.2	576.7
Avg	6742.6	1077.9	646.7
Highest 24 month Avg	7418	1185.8	711.5

New Crist 7 Cooling Tower Emissions Calculation

Future Potential Particulate

Assumptions: 190k gallons flow/min; drift = 0.0005%; Max TDS = 14,700 ppm @ 5% PM10 fraction; Avg TDS = 1935 ppm @ 60% PM 10 fraction

Max PM lb/hr = 190,000 gal/min * 0.0005 gal drift/100 gall flow * 14,700 lb PM/ million lbs H2O * 8.345 lb/gal H2O * 60 min/hr = **6.99**

Max PM10 lb/hr = PM hr * 5% fraction = **0.35 lb/hr**

Avg PM lb/hr = 190,000 gal/min * 0.0005 gal drift/100 gall flow * 1935 lb PM/ million lbs H2O * 8.345 lb/gal H2O * 60 min/hr = **0.92**

Avg PM10 lb/hr = PM hr * 60% fraction = **0.55 lb/hr**

Future Year	Hours of Operation	Max	Max	Avg	Avg
		PM annual Tons/Yr	PM10 annual Tons/Yr	PM annual Tons/Yr	PM10 annual Tons/Yr
	8760	30.6	1.531	4.0	2.419

Net Analysis:

Hourly

Max PM Past Actual - Max Future Potential = **2428.9 - 6.99 = 2421.9 lbs/hr**

Max PM 10 Past Actual - Max Future Potential = **121.44 - 0.35 = 121.1 lbs/hr**

Annual

Max PM Past Actual - Future Max Potential = **9008.8 - 30.6 tons = 8978.1 tons/yr**

Max PM10 Past Actual - Future Max Potential = **450.4 - 1.53 tons = 448.9 tons/yr**

Avg PM Past Actual - Future Avg Potential = **1185.8 - 4.0 tons = 1181.8 tons/yr**

Avg PM10 Past Actual - Future Avg Potential = **711.5 - 2.42 tons = 709.1 tons/yr**

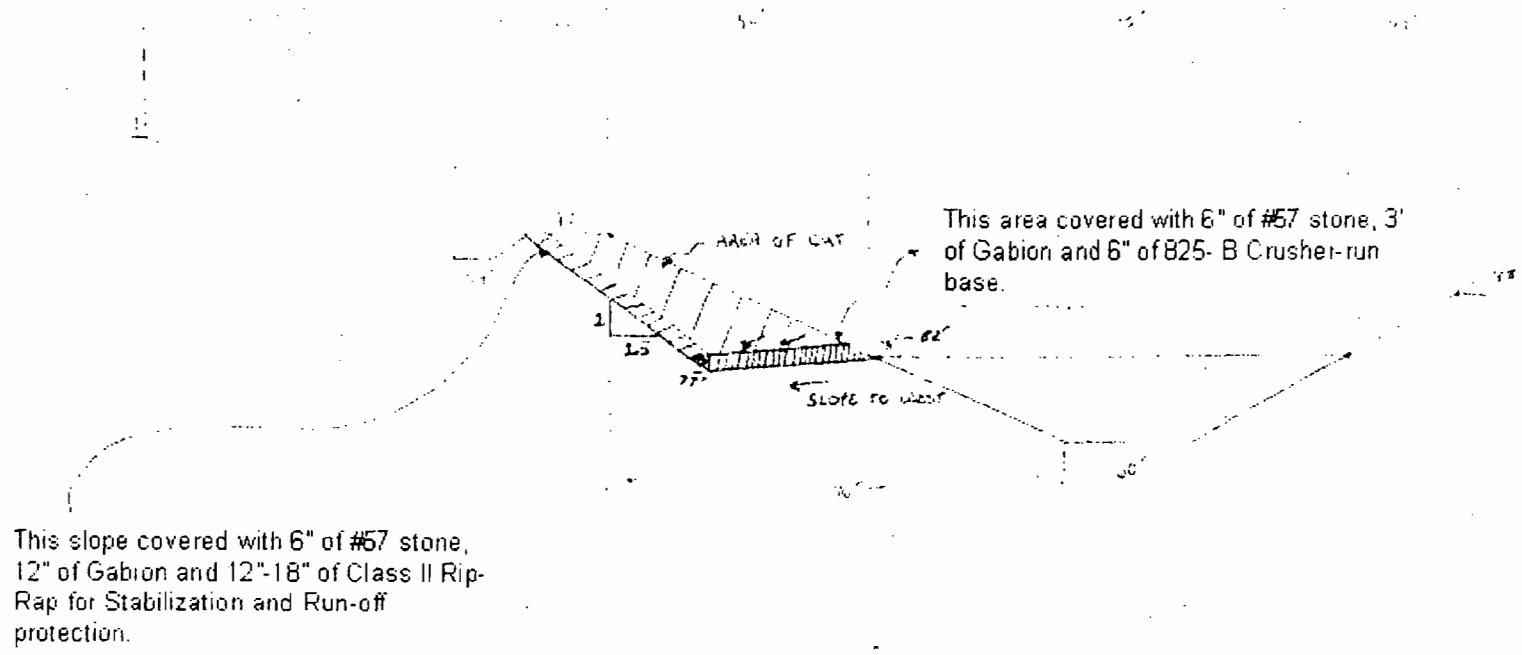
Gulf Power Plant Crist FGD Project

Site Preparation Work Scope

In preparation for relocating the Crist Unit 7 Cooling Tower, an area adjacent to the Unit 6 cooling water canal will be graded to (plant) elevation 77' and covered with stone up to elevation 82'. The new slope will be cut at 1.5 to 1 and covered with rip rap for erosion protection.

The area to be modified starts immediately south of the existing ash line pipe bridge and continues approximately 550' northward along the west bank of the Unit 6 cooling water canal. The existing concrete lined ditch at elevation 94' will be left undisturbed. The new work platform at elevation 82' will be sloped to the west (away from the canal) and to the north so that all storm water running off of the new slope and work platform is collected and directed northward to a point where it will be de-silted and deposited into the canal.

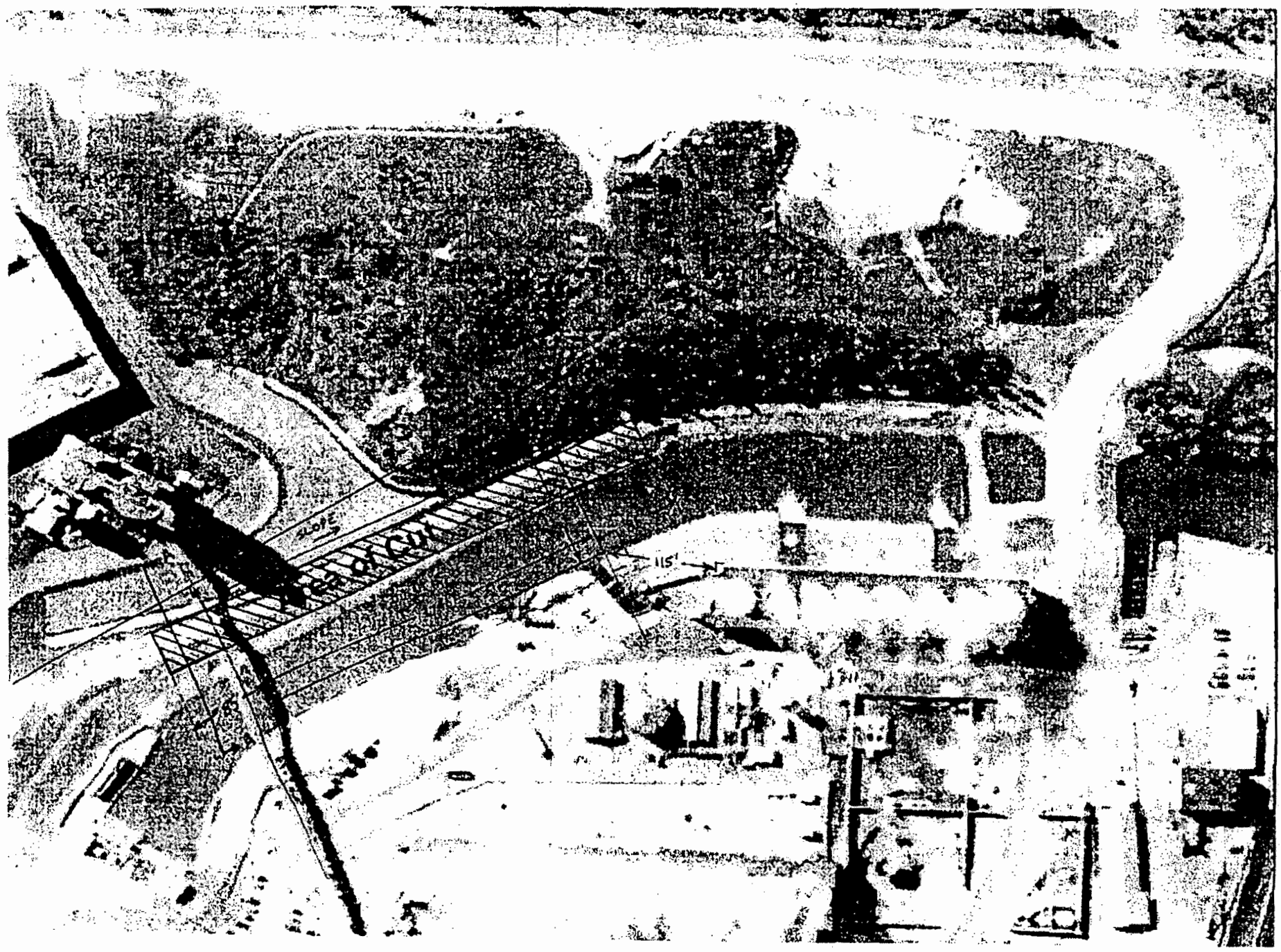
Looking North at Pipe Bridge



This slope covered with 6" of #57 stone, 12" of Gabion and 12"-18" of Class II Rip-Rap for Stabilization and Run-off protection.

This area covered with 6" of #57 stone, 3' of Gabion and 6" of 825- B Crusher-run base.

SECTION A-A



ATTACHMENT: COOLING TOWER CERTIFICATION

One Energy Place
Pensacola, Florida 32520



Certified Mail

April 30, 2007

Mr. Rick Bradburn
Florida Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, FL 32501-5794

Dear Mr. Bradburn:

RE: CRIST ELECTRIC GENERATING FACILITY
UNIT 7 COOLING TOWER CERTIFICATION
PERMIT No: 0330045-014-AC

Please find attached a statement of certification that the Crist Unit 7 Cooling Tower was constructed and installed so as to achieve the specified drift rate of no more than 0.0005 percent of the circulating water flow rate. The submission is required under Specific Condition #5 of the above referenced air construction permit within 60 days of commencement of operation. The Cooling Tower was placed into service on April 23, 2007.

Please let me know if you have any questions regarding the statement of certification or if you need further information regarding the Crist Unit 7 Cooling Tower Project.

Sincerely,

A handwritten signature in black ink that reads "Dwain Waters, QEP".

G. Dwain Waters, QEP
Special Projects and Environmental Assets Coordinator

cc: w/att: John Dominey, Gulf Power Company
Jim Vick, Gulf Power Company
Terry Wright, Gulf Power Company
Jay Weston, Gulf Power Company
David Hollinger, Southern Company Services



Hwy. 19 East • PO Box 1485 • Chickasha, OK 73023
405 224 4822 Fax 405 224 4825
www.midwesttowers.com

April 20, 2007

Attention: David Hollinger, Project Manager
Reference: SCS, Gulf Power – Plant Crist Unit 7 Drift Test
Subject: Counterflow Cooling Tower, Inquiry 27269
Midwest Towers, Inc. Proposal No. MT-N-26132

Gentlemen:

Midwest offers the following regarding drift rate;

The Gulf Power – Crist 7 cooling tower was installed with Brentwood Industries, Inc product model DE-080 cellular drift eliminators. The DE-080 drift elimination system is the latest technology that will provide a maximum drift rate of 0.0005%.

Please advise if you need additional information or if you have any questions.

Sincerely,
MIDWEST TOWERS, INC.

A handwritten signature in cursive script, reading 'Terry G. Ogburn', written in black ink.

Terry G. Ogburn
Vice President

TGO/se

Cc: James W. Cuchens – SCS
Doug Stinson – As-Tech

CTI



Project: SCS Gulf Power Plant Crist Unit 7
 Location: Pensacola, FL

Midwest Towers Proposal: MT-N-26132
 Rev. No: 1
 Date: July 31, 2006

COOLING TOWER DATA SHEET

Cooling Tower		Fans	
Type:	Induced draft	Number of Fans:	14
Air Flow:	Counterflow	Manufacturer:	Hudson Products Co.
Model No.:	CFT4854-3307-2x7	Type:	Axial Flow
Drawing No.:	A-110	Model No.:	APT-33H-10
No. Cells:	14	Diameter:	33 ft
Position:	2x7 Back-to-Back	Number of Blades:	10
Operating Conditions		Blade Material:	FRP
Water Flow (gpm):	180,000	Hub Material:	Galvanized Steel
Inlet Water Temp. (°F):	121.5	Rotation (rpm):	118
Exit Water Temp. (°F):	88.5	Fan Tip Speed:	12,163 (ft./min)
Wet Bulb Temp. (°F):	80	Motor Power Req'd.:	196
Relative Humidity (%):	50	Static Efficiency (%):	67.5
Heat Load (MMBtu/hr.):	2936	Air Flow (cfm):	1,325,662
Evaporation Loss (%):	2.93	Static Pressure (w.c.):	0.531"
Elevation (ft.):	0	Motors	
Dimensions		Number:	14
Each Cell (LxW):	48' x 54'	Manufacturer:	Siemens or equal
Overall Dims (LxW):	336' x 108'	Type:	TEFC, w/space htr
Fan Stack Height (ft.):	10'	Frame Size:	447T
Ht. BWall to Fandk (ft.):	44'-11"	Rated Horsepower:	200
Distribution System		Service Factor:	1.15
Type:	Low pressure	Rotation (rpm):	1800
Material:	FRP & PVC	Voltage (volts):	460
Inlet Water Flange:	30" FRP w 125# Drill	Frequency (Hz):	60
Inlet Water Height:	33'-11"	Phase:	3
Tower Pump Head:	37'-11"	Gear Reducers	
Fill		Number:	14
Type:	VF19 Plus Cellular	Manufacturer:	Amarillo Gear Co.
Material:	PVC	Type:	Right angle
Fill Volume:	254,016 (ft ³)	Model No.:	1712
Water Loading:	4.94 (gpm/ft ²)	Reduction Ratio:	15.0 : 1
Air Inlets on two sides:	23 feet high	Service Factor:	2.0
Drift Eliminators		Gear Type:	Spiral Bevel
Type:	BW DE-080 Cellular	Lubrication:	Oil / Solash
Material:	PVC	Couplings	
Drift Loss (%):	0.0005	Number:	14
Structure Materials		Manufacturer:	Amarillo
Casing:	FR FRP	Model No.:	CF73 950X
Fan Stack:	FR FRP	Service Factor:	2.0
Structure:	FR FRP	Sleeve Material:	Composite
Stairway, 2 each:	FR FRP	Flexible Material:	Carbonfiber/Epoxy
Access Ladder:	NONE	Accessories	
		Vibration Switch:	Matrix 5550
		Oil Fill / Drain Line:	Stainless Steel Piping