



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

April 10, 2001

CERTIFIED MAIL – Return Receipt Requested

Mr. Robert G. Moore
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Moore:

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)

The Department has reviewed the request that you provided on March 8, 2001. 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.

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,

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Mr. Robert G. Moore
Gulf Power Company
Crist Electric Generating Plant: Unit #7
Page Two

fuel flow, excess air and flue gas temperature, and other unit specific parameters that are needed for the computer model.

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 office and the Bureau of Air Regulation 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 April 14 to May 4, 2001. 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), 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. Robert G. Moore
Gulf Power Company
Crist Electric Generating Plant: Unit #7
Page Three

11. Attachment Section.

- a. Mr. G. Dwain Waters's letter received March 8, 2001.
- 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,



Howard L. Rhodes, Director
Division of Air Resources Management

HLR/rbm

Enclosures

cc: Clair Fancy, DEP - BAR
Scott Sheplak, DEP - BAR
Sandra Veazey, DEP - NWD
Andy Allen, DEP - NWD
Joe Kahn, DEP - BAMMS
G. Dwain Waters, Q.E.P., GPC

FINAL DETERMINATION

Gulf Power Company

Project No.: 0330045-002-AC

I. Public Notice and Comments.

The Public Notice of the permitting project was published in the Pensacola News Journal on March 20, 2001. There were no written comments received in the commenting period (14-days), which concluded at the close of business of April 2nd. However, on March 19th, Mr. Dwain Waters, with Gulf Power Company, phoned Mr. Bruce Mitchell and provided the following comments on the draft authorization letter:

1. On the 1st page, 2nd paragraph, 6th line, insert "and opacity" after "...particulate matter emissions" and make "standard" plural; and, it will read as:

.....particulate matter emissions and opacity standards.

2. On the 2nd page, condition No. 1 requires a notification of 15 days, which would conflict with the proposed date of April 16th. Therefore, "Unless waived," will be placed at the beginning of the condition as follows:

1. Unless waived, the permittee shall notify.....

3. On the 2nd page, condition No. 10, add a statement to the end on the condition to cover a situation where the testing ends after business hours. Therefore, the following sentence will be added to the end of the condition:

If after work hours, notification shall occur on the next work day.

II. Conclusion.

The changes requested were acceptable and did not significantly change the permitting action. Therefore, it is recommended to issue the authorization letter with the above changes made.



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

February 14, 2001

Mr. Dwayne Waters
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Waters:

RE: Guidance for Authorization to Conduct Potential Testing/Measurements for CAM

I have provided some excerpts of documents from some previous permitting activities where authorization to conduct some testing was pursued by Florida Crushed Stone Company. Included are the request, the Intent package, and the authorization letter. As for the request, it seems appropriate that you would provide a cover letter outlining your intent, referring to Section 403.061(18), Florida Statutes, as the suggested route that the Department might use to authorize some testing and/or measurements for CAM. Also, the request should contain the equipment [emissions unit(s)] involved, a finite timeframe (beginning and ending dates) needed to conduct any testing and/or measurements, the pollutants to be pursued, the parameters to be measured, and the specific test method(s) that you would like to perform and/or the equipment that will be used to make measurements. If we needed additional clarification or information, we would forward a request to you. Since you have already received your initial Title V Operation Permit, there would be no processing fee required.

Once we have received an acceptable request, an Intent package would be sent to you providing you with a Public Notice for publication in the newspaper of general circulation. Once through this activity satisfactorily, an authorization would be issued to you to allow you to conduct your testing and/or measurements. After conducting the testing and/or measurements, the data shall be made available to the Department.

I hope that the information provided will be helpful to you in preparing a request to us for authorization to conduct tests and/or measurements for CAM. If not, please give me a call at 850/921-9506.

Sincerely,

R. Bruce Mitchell
Environmental Administrator
Title V Section - Bureau of Air Regulation

RBM/m

Enclosures

cc: C. H. Fancy, BAR
Scott Sheplak, BAR
Sandra Veazey, NWD
Andy Allen, NWD

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Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

October 28, 2002

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

Dear Mr. Ussery:

RE: Additional Time 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 Electric Generating Plant's Unit No. 6's Electrostatic Precipitator (ESP)
0330045-003-AC

The Department has reviewed the request that you provided on June 5, 2002; and, the request for additional time authorization received October 24, 2002. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Crist Electric Generating Plant's Unit No. 6'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.

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 Electric Generating Plant's Unit No. 6'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 No. 6'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, 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.

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Mr. Gene L. Ussery
Gulf Power Company
Crist Electric Generating Plant: Unit No. 6
0330045-003-AC
Page Two

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

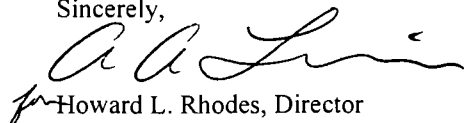
1. Unless waived, the permittee shall notify the Department's Northwest District Office and Bureau of Air Regulation Office at least 15 days prior to commencement of the performance tests and parameter measurements or monitoring. A written report shall be submitted to these offices within 45 days upon completion of the last test run and parameter measurements and monitoring.
2. The authorized testing and measurement and monitoring schedule is from October 28, 2002, through June 30, 2003. 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, 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.
4. Emissions testing shall be conducted concurrently 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 performance test plans are as follows:
 1. Conduct a performance test (three 1-hour runs) using EPA Method 17 at "normal" operations;
 2. Conduct a performance test (three 1-hour runs) using EPA Method 17 at a reduction in the ESP efficiency; and,
 - 3.a. If the test results show that the PM allowable limit was exceeded; then the ESP's efficiency will be increased and a third performance test using EPA Method 17 will be conducted (supposedly between "normal" and "at the reduced efficiency"); or,
 - b. If the test results show that the PM allowable limit was not exceeded; then the ESP's efficiency will be further decreased and a third performance test using EPA Method 17 will be conducted in an attempt to define the outer range of the ESP's efficiency at which the PM allowable limit will be exceeded; and,
 - c. If the outer range is not established by the 2nd and 3rd performance tests, then the performance testing is ended for that emissions unit; and, Gulf Power Company will use the data to help define their CAM Plan for that emissions unit tested.
6. The release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C., is not authorized for this activity.
7. 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.

Mr. Gene L. Ussery
Gulf Power Company
Crist Electric Generating Plant: Unit No. 6
0330045-003-AC
Page Three

8. The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida.
9. This Department action is just to authorize the performance testing and parameter measurements and monitoring for the Crist Unit No. 6's ESP for the purpose of developing a CAM protocol.
10. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
11. 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.
12. Attachment Section.
 - a. Mr. G. Dwain Waters's letter received June 5, 2002.
 - b. Final Determination.
 - c. Mr. G. Dwain Waters's letter received October 24, 2002.
 - d. Additional time authorization letter dated October 28, 2002.

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,


for Howard L. Rhodes, Director
Division of Air Resource Management

HLR/rbm

Enclosures

cc: Scott Sheplak, DEP - BAR
Sandra Veazey, DEP - NWD
Kevin White, DEP - NWD
Joe Kahn, DEP - BAMMS
G. Dwain Waters, Q.E.P., GPC
Gregory N. Terry, P.E., GPC

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. Received by (Please Print Clearly) <i>R. BEACH</i>	B. Date of Delivery <i>10-29-0</i>
1. Article Addressed to: Mr. Gene L. Ussery V.P. of Power Generation/Transmission Gulf Power Company One ENergy Place Pensacola, Florida 32520-0328	C. Signature <i>X R. Beach</i>	
2. Article Number (Copy from service label) 7000 0600 0021 6524 2779	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	

U.S. Postal Service CERTIFIED MAIL RECEIPT <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>											
Article Sent To: Mr. Gene L. Ussery											
<table border="1"> <tr> <td>Postage</td> <td>\$</td> </tr> <tr> <td>Certified Fee</td> <td></td> </tr> <tr> <td>Return Receipt Fee (Endorsement Required)</td> <td></td> </tr> <tr> <td>Restricted Delivery Fee (Endorsement Required)</td> <td></td> </tr> <tr> <td>Total Postage & Fees</td> <td>\$</td> </tr> </table>	Postage	\$	Certified Fee		Return Receipt Fee (Endorsement Required)		Restricted Delivery Fee (Endorsement Required)		Total Postage & Fees	\$	Postmark Here
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Name (Please Print Clearly) (to be completed by mailer) Mr. Gene L. Ussery Street, Apt. No.; or PO Box No. One Energy Place City, State, ZIP+4 Pensacola, Florida 32520-0328											
PS Form 3800, July 1999	See Reverse for Instructions										

7000 0600 0021 6524 2779

INTEROFFICE MEMORANDUM

TO: ~~Howard Rhodes~~ *by aaj*

THRU: A. A. Linero *aaj 10/28*

FROM: Bruce Mitchell *BM*

DATE: October 26, 2002

SUBJECT: Additional Time 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 Electric Generating Plant's Unit No. 6's and Lansing Smith's Units Nos. 1's and 2's Electrostatic Precipitators

A request for each referenced facility and emissions units was received on October 24, 2002, asking for additional time to conduct some pollutant testing and parameter measurements for CAM issues. The original authorization letters provided for an extension of time to conduct the proposed tests and monitoring so long some justification was provided (see Conditions No. 2). This was received and the proposed additional time authorization letters have been edited for signature. Also, a discussion with Pat Comer concluded that no additional Public Noticing would be required for these time extensions.

The original proposed project was Public Noticed in the Pensacola News Herald on July 11, 2002. No comments were received during the Public Notice period (14-days), which concluded on July 25, 2002.

In conclusion, it is recommended that the additional time authorization letters be signed.

HLR/rbm

Attachments

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

JUL 19 2002

BUREAU OF AIR REGULATION

Certified Mail



July 18, 2002

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

Dear Mr. Mitchell:

RE: CRIST ELECTRIC GENERATION FACILITY
DEP File No. 0330045-003-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 June 25, 2002.

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, Q.E.P.".

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
Kevin White, 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 Glenda Nall 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 to Issue an Air Construction Permit was published in said newspaper in the issues of July 11, 2002. Affiant 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 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 11th day of July A.D., 2002.

[Signature of Bereth Ferguson]

Bereth Ferguson

Notary Public

BERETH FERGUSON Notary Public-State of FL My Comm. Expires OCT. 10, 2005 Comm. No. DD048652

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL

Draft Air Construction Permit No.: 0 Gulf Power Compan Crist Electric Generating Escambia County

The Department of Environmental Protection (perm intent to issue an air construction permit to Gulf Pov Generating Plant located in Pensacola, Escambia Cou address are: Gene L. Ussery, V.P. of Power Generation/ ny, One Energy Place, Pensacola, Florida 32520-032

The permittee, Gulf Power Company, applied on J conduct pollutant testing and parameter measurem pliance Assurance Monitoring (CAM) protocol for t Units Nos. 4, 5 & 6's ESP (electrostatic precipitator), tric Generating Plant in Pensacola, Escambia County Power Company to vary the collection efficiency of th curve between opacity, particulate matter emissions an operational condition near or in excess of the Fic standard. The data gathered will allow the calibration search Institute) computer model to evaluate the per 4, 5 & 6's ESP. The pollutants and or parameters to l clude sulfur dioxide [CEM (continuous emission moni ticulate matter, carbon dioxide (CEM), ash content c unit operational parameters including load, fuel flow, and other unit specific parameters that are needed fo ticulate size distribution may be evaluated also. The c to run from September 1 through November 30, 2002

The permitting authority will issue the Air Construct Air Construction Permit, in accordance with the condi Permit unless a response received in accordance with in a different decision or significant change of terms c

The permitting authority will accept written commen Air Construction Permit issuance action for a period o of publication of this Notice. Written comment: Department's Bureau of Air Regulation, 2600 Blair l Tallahassee, Florida 32399-2400. Any written comma for public inspection. If written comments received re Draft Air Construction Permit, the permitting authori Construction Permit and require, if applicable, another

A person whose substantial interests are affect decision may petition for an administrative hearin 120.569 and 120.57, Florida Statutes (F.S.). The peti set forth below and must be filed (received) in O Department of Environmental Protection, 3900 Comr #35, Tallahassee, Florida 32399-3000 (Telephone: 85 Petitions filed by any persons other than those entitl 120.60(3), F.S., must be filed within fourteen days of p within fourteen days of receipt of the notice of inter Section 120.60(3), F.S., however, any person who a notice of agency action may file a petition within fourte regardless of the date of publication. A petitioner st the applicant at the address indicated above, at the tir son to file a petition within the applicable time perio person's right to request an administrative determi 120.569 and 120.57, F.S., or to intervene in this proce to it. Any subsequent intervention will be only at the upon the filing of a motion in compliance with Rule 2 Code (F.A.C.).

A petition that disputes the material facts on which t based must contain the following information:

- (a) The name and address of each agency affect identification number(s), if known; (b) The name, address and telephone number o and telephone number of the petitioner's represen address for service purposes during the cours explanation of how petitioner's substantial rights determination; (c) A statement of how and when the petitioner action or proposed action; (d) A statement of all disputed issues of materi petition must so state; (e) A concise statement of the ultimate facts all statutes which entitle petitioner to relief; and (f) A demand for relief.

A petition that does not dispute the material fa authority's action is based shall state that no s otherwise shall contain the same information as s Rule 28-106.301, F.A.C.

Because the administrative hearing process is de action, the filing of a petition means that the permit be different from the position taken by it in this n substantial interests will be affected by any such authority on the application have the right to peti proceeding, in accordance with the requirements se

Mediation is not available for this proceeding.

A complete project file is available for public insp hours, 8:00 a.m. to 5:00 p.m., Monday through Frida

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

Affec Depart Protec North Air Re 160 G Pens Teleph Fax: 6

The complete project file includes the Draft application/request, and the information submitted by of confidential records under Section 403.111, F.S. li Scott M. Shepiak, P.E., at the above address, or c information.

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Construction Permit No.: 0330045-003-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 to Gulf Power Company for its Crist Electric Generating Plant located in Pensacola, Escambia County. The applicant's name and address are: Gene L. Ussey, V.P. of Power Generation/Transmission, Gulf Power Company, One Energy Place, Pensacola, Florida 32520-0328.

The permittee, Gulf Power Company, applied on June 5, 2002, 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 Units Nos. 4, 5 & 6'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 standard. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Units Nos. 4, 5 & 6'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, 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 September 1 through November 30, 2002.

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 403.11, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532 for additional information.

235

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

OCT 24 2002

DIVISION OF AIR
RESOURCES MANAGEMENT



Certified Mail

October 21, 2002

R. Bruce Mitchell
Title V Section – 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 EXTEND CAM PROTOCOL TESTING
PERMIT No: 0330045-003-AC

Thanks again for meeting with Mike Markey and me last week regarding our continuing efforts to prepare protocols for Compliance Assurance Monitoring (CAM). As outlined in our meeting, Gulf Power is requesting the construction permit for conducting CAM testing at Plant Crist be extended until June 30, 2003. The main reason for the request is due to increased budgetary constraints facing Gulf Power in 2002. CAM test at Crist Units 4 & 5 were completed on schedule and their reports are being submitted to the Department later this month.

Attached is an authorization statement by Gene L. Ussery, Jr., the Responsible Official outlining his approval of this permit extension request.

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,

A handwritten signature in black ink, appearing to read "Dwain Waters". The signature is written over a horizontal line.

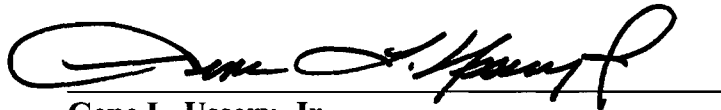
G. Dwain Waters, Q.E.P.
Air Quality Programs Supervisor

cc: w/att: Jim. Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Kevin Beaty, Gulf Power Company
Clark Mitchell, Southern Company Services
Gary Perko, HGSS
Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida

**CERTIFICATION BY RESPONSIBLE OFFICIAL
CRIST UNITS 4,5,6 COMPLIANCE ASSURANCE
MONITORING TEST PERMIT EXTENSION 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 extension 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**

10-17-02
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. Received by (Please Print Clearly) <i>R BEACH</i> B. Date of Delivery <i>10-29-0</i></p> <p>C. Signature <i>R Beach</i> <input checked="" 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>Mr. Gene L. Ussery V.P. of Power Generation & Transmission Gulf Power Company One Energy Place Pensacola, Florida 32520-0328</p>	<p>3. Service Type</p> <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> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Copy from service label) 7000 0600 0021 6524 2779</p>	

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

Article Sent To:
Mr. Gene L. Ussery

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

Name (Please Print Clearly) (to be completed by mailer)
Mr. Gene L. Ussery

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

City, State, ZIP+4
Pensacola, Florida 32520-0328

PS Form 3800, July 1999 See Reverse for Instructions

7000 0600 0021 6524 2779

Example

- The spot speeds of four vehicles were observed as 30, 40, 50, and 60 mph. Compute the space mean speed over a 300 ft length.

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 (Copy from service label)
 7000 0520 0020 9371 3124

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) J. Gardner B. Date of Delivery 06/27/02

C. Signature [Signature] 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)**

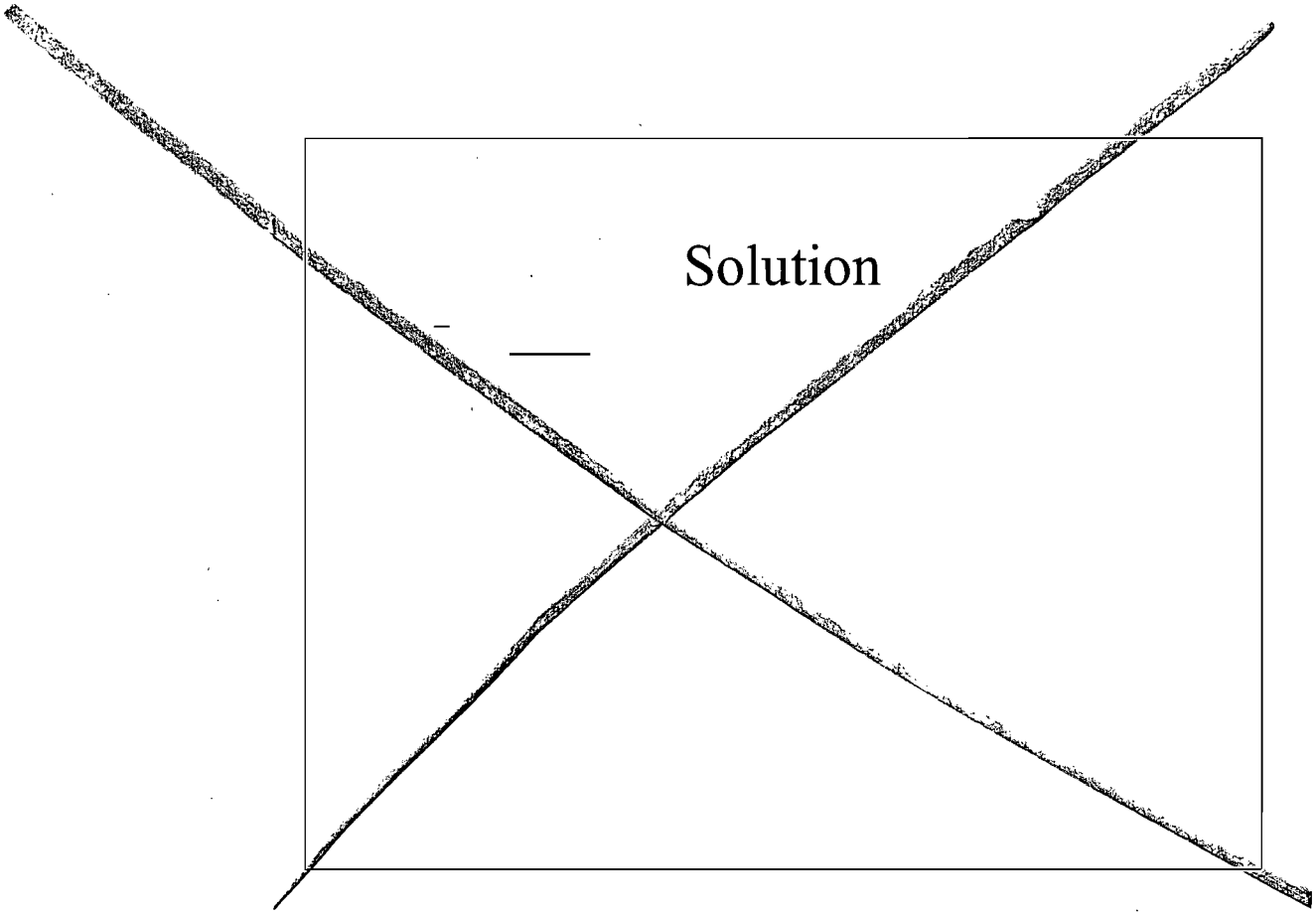
427E 727E 9371 0200 0250 0000

Mr. Gene L. Ussery

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

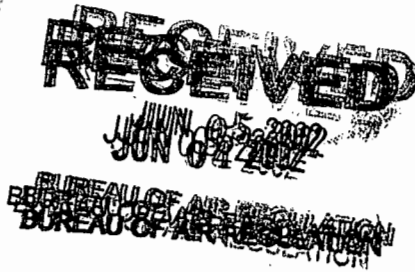
PS Form 3800, February 2000 See Reverse for Instructions



One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

BEST AVAILABLE COPY



RECEIVED

JUN 05 2002

BUREAU OF AIR REGULATION



Certified Mail

May 29, 2002

R. Bruce Mitchell
Title V Section – 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

0330045-003-AC

Thanks again for meeting with me last year and sending examples of similar permitting activities to help Gulf Power properly coordinate our proposed testing of Crist Units 4, 5, 6 for development of a Compliance Assurance Monitoring (CAM) protocol. 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 a EPRI (Electric Power Research Institute) computer model to evaluate the performance of the Crist electrostatic precipitators (ESPs). 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 the CAM protocol developmental testing on Crist Units 4,5,6 from September 1 through November 30, 2002 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."

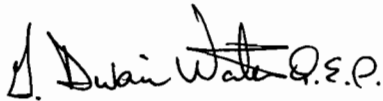
Mr. R. Bruce Mitchell
May 29, 2002
Page 2

The specific equipment to be tested is the 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 possible particulate size distribution.

Attached is an authorization statement by Robert G. Moore, 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 discussed this project with 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

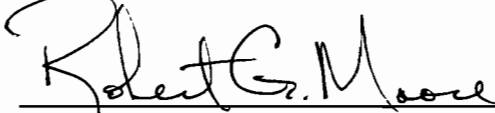
cc: w/att: Jim. Vick, Gulf Power Company
Joe Martin, Gulf Power Company
John Dominey, Gulf Power Company
Kevin Beaty, Gulf Power Company
Greg Terry, Gulf Power Company
Danny Herrin, Southern Company Services
Milan McGill, Southern Company Services
Clark Mitchell, Southern Company Services
Gary Perko, HGSS

Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida
Mr. Keith White, FDEP Northwest District Office, Pensacola, Florida

**CERTIFICATION BY RESPONSIBLE OFFICIAL
CRIST UNITS 4,5,6 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 data contained in this request are true, accurate and complete.”

Responsible Official Signature:



Robert G. Moore
Vice-President of Power Generation/Transmission

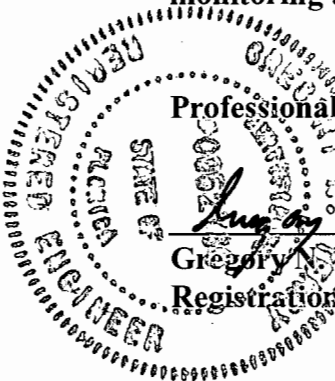
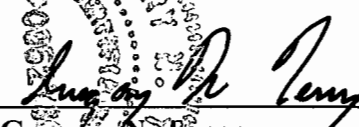
5/29/02

Date:

**CRIST UNITS 4,5,6 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:

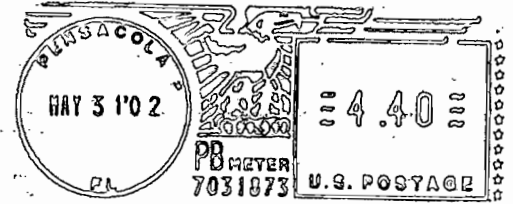
Gregory N. Perry
Registration Number: 52786

5.30.02

Date



One Energy Place
Pensacola FL 32520




R BRUCE MITCHELL
TITLE V SECTION BUREAU OF AIR REGULATION
FDEP MAIL STATION 5510
2600 BLAIR STONE RD
TALLAHASSEE FL 32399-2400

Florida Department of
Environmental Protection

Memorandum

TO: Clair Fancy

THRU: Scott Sheplak

FROM:  Bruce Mitchell

DATE: 6/14/02

SUBJ: Request to Conduct CAM Evaluations from Gulf Power Company
Crist, Schultz and Smith Plants

On June 5th, we received three (3) requests from Mr. Dwayne Waters (Gulf Power Company), requesting a construction permit for authorization to conduct evaluations (performance tests) on opacity, PM, and ash resistively for the CAM affected emissions units located at the above referenced Plants. All of the emissions units are coal fired boilers with ESPs on them for control of PM and opacity. The request indicates the potential of exceeding the PM allowable limit to determine the ESP's efficiency level at which the exceedence will occur, which will help in defining the CAM Plan approach for the emissions unit being tested.

I spoke with Mr. Waters on Wednesday morning and discussed some of the details on the project, mainly about the potential exceedence of the PM emissions limit(s) with any of the affected emissions units. He said that he was being provided only with enough funds to conduct three (3) performance tests per emissions unit. Therefore, the testing plans are as follows:

1. Conduct a performance test (three 1-hour runs) using EPA Method 17 at "normal" operations;
2. Conduct a performance test (three 1-hour runs) using EPA Method 17 at a reduction in the ESP efficiency; and,
- 3.a. If the test results show that the PM allowable limit was exceeded; then the ESP's efficiency will be increased and a third performance test using EPA Method 17 will be conducted (supposedly between "normal" and "at the reduced efficiency"); or,
- b. If the test results show that the PM allowable limit was not exceeded; then the ESP's efficiency will be further decreased and a third performance test using EPA Method 17 will be conducted in an attempt to define the outer range of the ESP's efficiency at which the PM allowable limit will be exceeded; and,
- c. If the outer range is not established by the 2nd and 3rd performance tests, then the performance testing is ended for that emissions unit; and, Gulf Power Company will use the data to help define their CAM Plan for that emissions unit tested.

Note: Concurrent VE performance testing evaluations will be required while conducting the PM performance tests. I believe that all of the emissions units have COMS in their stacks for continuous opacity readings, which, with the VE readings, should provide additional data to use in developing the CAM Plan for the affected emissions unit.

The Scholtz Plant is tentatively scheduled for July 15th. The AC protocol requires a 14-day Public Notice prior to issuance.