UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

4APT-ARB

DEC 1999

Mr. Robert G. Moore
Alternate Designated Representative
Gulf Power Company
1 Energy Place
Pensacola, Florida 32520

SUBJ: Phase I Acid Rain Permit Revision

Dear Mr. Moore:

Enclosed you will find the Phase I Acid Rain permit revisions issued for public comment as a direct final action by the U.S. Environmental Protection Agency (EPA). These revisions are for the affected compliance plans for Gulf Power Company. These revisions will be final 40 days after the publication of the Federal Register notice unless significant, adverse comments regarding these revisions are received during the 30 day public comment period. The notice of these permit actions was published in the Federal Register on November 29, 1999 (see 64 FR 66632, November 29, 1999).

Your cooperation has been appreciated. If you have any questions or comments, please contact Ms. Jenny Jachim at (404) 562-9126.

Sincerely,

Douglas Neeley

R. Douglas Neeley
Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

Enclosure

cc: W. Danny Herrin, Southern Company Services, Inc.
Tom Cascio, Florida DEP

Company	Facility ID No.	Facility Name	Emissions Unit ID. No(s).	Compliance Plan Submitted
Gainesville Regional Utilities	0010006	Deerhaven Station*	-005	12/22/97
Jacksonville Electric	0310001	St. John's River Power Park*	-001	12/24/97
			-004	12/24/97
City of Lakeland	1050004	C.D. McIntosh*	-006	12/9/97
Seminole Electric Coop.	1070025	Seminole Power Plant*	-001	11/24/97
			-002	11/24/97
Florida Power	0170004	Crystal River*	-001	12/24/97
			-002	12/24/97
			-004	12/24/97
			-005	12/24/97
Tampa Electric	0570039	Big Bend	-001	12/29/97
			-002	12/29/97
			-003	12/29/97
			-004	12/29/97
Tampa Electric	0570040	F.J. Gannon Station	-001	Claim exempt
			-002	Claim exempt
			-003	12/29/97
			-004	12/29/97
			-005	12/29/97
			-006	12/29/97
Orlando Utilities	0950137	Stanton Energy	-001	1/5/98
			-002	1/5/98
Gulf Power	0050014	Lansing Smith	-001	12/22/97
			-002	12/22/97
Gulf Power	0630014	Scholz	-001	12/22/97
			-002	12/22/97
Gulf Power	0330045	Crist	-004	12/22/97
			-005	12/22/97
			-006	12/22/97
			-007	12/22/97

*Phase I Early Election. Limits effective 1/1/97.

Effective 1/1/97

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REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

ORIGINAL: CLAIR
cc: HCR
11/4
COPY: Jim Smith

4EAD

NOV 03 1999

VIA FACSIMILE (202-296-7937) and
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL | # of pages ▸ 18

To Howard Rhodes	From Chris Beckett
Dept./Agency FL DEP	Phone # 404/562-9195
Fax # 850/922-6979	Fax #

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

Mr. Karl R. Moor
Vice President and
Associate General Council
Southern Company
1130 Connecticut Avenue, N.W., Suite 830
Washington, DC 20036

SUBJ: Notice of Violation

Dear Mr. Moor:

Enclosed is a Notice of Violation (NOV) issued to Southern Company Services, Inc., Georgia Power Company, Alabama Power Company, Mississippi Power Company, Gulf Power Company, and Savannah Electric & Power Company under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. §7413(a)(1). In the NOV, the Environmental Protection Agency notifies those companies of violations of pre-construction permitting requirements under federal regulations and under State Implementation Plans at the power plants identified in the NOV.

Please note the opportunity to confer outlined in the NOV. As indicated in the NOV, any request to confer should be directed to my attention.

RECEIVED
NOV 04 1999
BUREAU OF AIR REGULATION

Sincerely,

Charles V. Mikalian

Charles V. Mikalian
Associate Regional Counsel

Enclosure

faxed Kirby 922-1432 11/3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:	)	
	)	
Southern Company Services, Inc., Georgia Power Company, Alabama Power Company, Mississippi Power Company, Gulf Power Company, and Savannah Electric & Power Company	)	Notice of Violation
	)	EPA-CAA-2000-04-0006
Proceedings Pursuant to Section 113(a)(1) of the Clean Air Act, 42 U.S.C. §7413(a)(1)	)	

NOTICE OF VIOLATION

This Notice of Violation ("NOV") is issued to Southern Company Services, Inc. (Southern), Georgia Power Company, Alabama Power Company, Mississippi Power Company, Gulf Power Company, and Savannah Electric & Power Company (hereinafter referred to collectively as the "Southern Companies") for violations of the Clean Air Act ("the Act") at the coal-fired power plants identified below. The Southern Companies have embarked on a program of modifications intended to extend the useful life, regain lost generating capacity, and/or increase capacity at their coal-fired power plants.

Commencing at various times from 1977 to the present, the Southern Companies have modified and operated the coal-fired power plants identified below without obtaining New Source Review ("NSR") permits authorizing the construction and operation of physical modifications at their boiler units as required by the Act. In addition, for each physical modification at these power plants, the Southern Companies have operated these modifications without installing pollution control equipment required by the Act. These violations of the Act and the State Implementation Plans ("SIP") of Georgia, Alabama, Mississippi and Florida have resulted in the release of massive amounts of Sulfur Dioxide ("SO_2"), Nitrogen Oxides ("NO_x"), and Particulate Matter ("PM") into the environment. Until these violations are corrected, the Southern Companies will continue to release massive amounts of illegal SO_2, NOx, and PM into the environment.

This NOV is issued pursuant to Section 113(a)(1) of the Act, as amended, 42 U.S.C.A. Section 7401-7671q. Section 113(a) of the Act requires the Administrator of the United States Environmental Protection Agency ("EPA") to notify any person in violation of a state implementation plan or permit of the violations. The authority to issue this NOV has been delegated to the

Regional Administrator of EPA Region 4 and further redelegated to the Director, Air, Pesticides and Toxics Management Division, EPA, Region 4.

STATUTORY AND REGULATORY BACKGROUND

1. When the Act was passed in 1970, Congress exempted existing facilities, including the coal-fired power plants that are the subject of this Notice, from many of its requirements. However, Congress also made it quite clear that this exemption would not last forever. As the United States Court of Appeals for the D.C. Circuit explained in Alabama Power v. Costle, 636 F.2d 323 (D.C. Cir. 1979), "the statutory scheme intends to 'grandfather' existing industries; but...this is not to constitute a perpetual immunity from all standards under the PSD program." Rather, the Act requires grandfathered facilities to install modern pollution control devices whenever the unit is proposed to be modified in such a way that its emissions may increase.

2. The NSR provisions of Parts C and D of Title I of the Act require preconstruction review and permitting for modifications of stationary sources. Pursuant to applicable regulations, if a major stationary source is planning upon making a major modification, then that source must obtain either a PSD permit or a nonattainment NSR permit, depending on whether the source is located in an attainment or a nonattainment area for the pollutant being increased above the significance level. To obtain this permit, the source must agree to put on the best available control technology ("BACT") for an attainment pollutant or achieve the lowest achievable emission rate ("LAER") in a nonattainment area, or in the case of a modification that is not major, must meet the emission limit called for under the applicable minor NSR program.

3. Pursuant to the Act, the SIP of Georgia requires that no construction or operation of a modification of a major stationary source occur without first obtaining a NSR permit. See: for PSD permits in attainment areas, 40 C.F.R. § 52.21(i), and Section 7 of Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02, which is part of the Georgia SIP that was approved by EPA on September 18, 1979, as amended on February 10, 1982 (47 Fed. Reg. 6017), December 14, 1992 (57 Fed. Reg. 58989) and February 2, 1996 (61 Fed. Reg. 3817); for NSR permits in nonattainment areas, Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.03, which is part of the Georgia SIP that was approved by EPA on September 18, 1979 (44 Fed. Reg. 54047) and amended on March 8, 1995 (60 Fed. Reg. 12688); for minor modifications regardless of attainment status, Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.03, which is part of the Georgia SIP that was approved by EPA on August 20, 1976 (41 Fed. Reg. 35184), and amended on September 18, 1979 (44 Fed. Reg. 54047) and on March 8, 1995 (60 Fed. Reg. 12688).

4. Pursuant to the Act, the SIP of Alabama requires that no construction or operation of a modification of a major stationary source occur without first obtaining a permit. See: for PSD permits in attainment areas, 40 C.F.R. § 52.21(i), and Alabama Department of Environmental Management Code 335-3-14-.04(8), which is part of the Alabama SIP that was approved by EPA on March 9, 1983 (48 Fed. Reg. 9860); for NSR permits in nonattainment areas, Alabama Department of Environmental Management Code 335-3-14-.05, which is part of the Alabama SIP that was approved by EPA on November 10, 1981 (46 Fed. Reg. 55518), as amended on December 28, 1987 (52 Fed. Reg. 48812); and for minor modifications regardless of attainment status, Alabama Department of Environmental Management Code 335-3-14-.01, which is part of the Alabama SIP that was approved by EPA on November 10, 1981 (46 Fed. Reg. 55518), as amended on December 28, 1987 (52 Fed. Reg. 48812).

5. Pursuant to the Act, the SIP of Mississippi requires that no construction or operation of a modification of a major stationary source occur without first obtaining a permit. See: for PSD permits in attainment areas, 40 C.F.R. § 52.21(i), and Mississippi Commission on Natural Resources regulation APC-S-5, which is part of the Mississippi SIP that was approved by EPA on October 15, 1990 (55 Fed. Reg. 41692), and amended on June 14, 1992 (57 Fed. Reg. 34252), on May 5, 1995 (60 Fed. Reg. 22287), and July 15, 1997 (62 Fed. Reg. 37724); for NSR permits in nonattainment areas, Mississippi Commission on Natural Resources regulation APC-S-2, Section IV, which is part of the Mississippi SIP that was approved by EPA on February 4, 1972 (37 Fed. Reg. 10875), as amended on September 15, 1994 (59 Fed. Reg. 47258) and on May 2, 1995 (60 Fed. Reg. 21442); and for minor modifications regardless of attainment status, Mississippi Commission on Natural Resources regulation APC-S-2, Sections III and IV, which are part of the Mississippi SIP that was approved by EPA on February 4, 1972 (37 Fed. Reg. 10875), as amended on September 15, 1994 (59 Fed. Reg. 47258) and on May 2, 1995 (60 Fed. Reg. 21442).

6. Pursuant to the Act, the SIP of Florida requires that no construction or operation of a modification of a major stationary source without first obtaining a permit. See: for PSD permits in attainment areas, 40 C.F.R. § 52.21(i), and the current Florida SIP Rule 62-212.400, Florida Administrative Code (F.A.C.), which is part of the Florida SIP that was approved by EPA on November 22, 1983 (48 Fed. Reg. 52716), and amended on October 20, 1994 (59 Fed. Reg. 52916), and on January 11, 1995 (60 Fed. Reg. 2688); for NSR permits in nonattainment areas, 40 C.F.R. § 52.24(a), and Florida SIP Rule 62-212.500, F.A.C., which was approved by EPA on November 22, 1983 (48 Fed. Reg. 52716), and amended on October 20, 1994 (59 Fed. Reg. 52916); and for minor NSR permits regardless of attainment status, 62-212.300, F.A.C., which is part of the Florida SIP that was approved by EPA on October 20, 1994 (59 Fed. Reg. 52916). No SIP-approval for PSD has been given to the State of Florida for power plants which are also subject to the Florida Power Plant Siting Act

(PPSA). Rather, Florida has a fully delegated PSD program with respect to power plants subject to the PPSA. Florida implements this delegation under 40 C.F.R. Section 52.21, whose provisions are incorporated by reference into the Florida SIP pursuant to 40 C.F.R. Section 52.530.

7. The SIP provisions identified in paragraphs 3-7 above are all federally enforceable pursuant to Sections 110 and 113 of the Act.

FACTUAL BACKGROUND

8. The Southern Companies are owners and/or operators of the facilities that are the subject of this NOV.

9. Southern and Georgia Power Company operate the Scherer Plant, a fossil fuel-fired electric utility steam generating plant located at 10986 Highway 87, Monroe County, Juliette, Georgia, 31046. The plant consists of 4 boiler units with up to 269,810,000 mmBTU annual heat input, and began operations in 1982.

10. Southern and Georgia Power Company operate the Bowen Plant, a fossil fuel-fired electric utility steam generating plant located at 317 Covered Bridge Road, Bartow County, Cartersville, Georgia, 30120. The plant consists of 4 boiler units with 207,281,000 mmBTU annual heat input in 1998, and began operations in 1972.

11. Southern and Savannah Power Company operate the Kraft Plant, a fossil fuel-fired electric utility steam generating plant located at P.O. Box 4068, Chatham County, Port Wentworth, Georgia, 31407. The plant consists of 4 boiler units, with 7,630,000 mmBTU annual heat input in 1997, and began operations in 1972.

12. The Scherer, Bowen and Kraft Plants are located in areas that have the following attainment/nonattainment classifications from 1979 to the present:

    For NO_2, the areas have been classified attainment or unclassifiable;
    For SO_2, the areas have been classified attainment or unclassifiable;
    For PM, the areas have been classified attainment or unclassifiable;
    For Ozone, the areas have been classified attainment or unclassifiable.

13. Southern and Alabama Power Company operate the Gorgas Steam Plant, a fossil fuel-fired electric utility steam generating plant located at 460 Gorgas Road, Walker County, Parrish, Alabama, 35580. The plant consists

of 5 boiler units (Nos. 6-10) with 89,621,000 mmBTU annual heat input in 1997, and began operations in 1972.

14. Southern and Alabama Power Company operate the Greene County Plant, a fossil fuel-fired electric utility steam generating plant located at Highway 83 and County Road 18, Greene County, Forkland, Alabama, 36732. The plant consists of 2 boiler units with 34,249,000 mmBTU annual heat input in 1997, and began operations in 1966.

15. The Gorgas and Green County Plants are located in areas that have the following attainment/nonattainment classifications from 1980 to the present:

> For NO_2, the areas have been classified attainment or unclassifiable;
> For SO_2, the areas have been classified attainment or unclassifiable;
> For PM, the areas have been classified attainment or unclassifiable.
> For Ozone, the areas have been classified attainment or unclassifiable.

16. Southern and Alabama Power Company operate the Barry Steam Plant, a fossil fuel-fired electric utility steam generating plant located at P.O. Box 70, Mobile County, Bucks, Alabama, 36512. The plant consists of 5 boiler units with 119,483,000 mmBTU annual heat input in 1997, and began operations in 1971.

17. The Barry Steam Plant is located in an area that has the following attainment/nonattainment classifications from 1980 to the present:

> For SO_2 and NO_2, the area has been classified attainment or unclassifiable;
> For, Ozone, the area has been classified nonattainment until June 12, 1987 and attainment since that time; and
> For TSP, the area has been classified nonattainment until November 15, 1984, and attainment since that time.

18. Southern and Alabama Power Company operate the Gaston Steam Plant, a fossil fuel-fired electric utility steam generating plant located at P.O. Box 1127, Shelby County, Wilsonville, Alabama, 35186. The plant consists of 5 boiler units with 111,239,000 mmBTU annual heat input in 1997, and began operations in 1974.

19. The Gaston Steam Plant is located in an area that has the following attainment/nonattainment classifications from 1980 to the present:

> For NO_2, the area has been classified attainment or unclassifiable;

For SO_2, the area has been classified attainment or unclassifiable;
For PM, the area has been classified attainment or unclassifiable.
For Ozone, the area has been classified attainment

20. Southern and Alabama Power Company operate the Miller Plant, a fossil fuel-fired electric utility steam generating plant located at 42050 Porter Road, Jefferson County, Quinton, Alabama, 35130. The plant consists of 4 boiler units with 204,211,519 mmBTU annual heat input in 1998, and began operations in 1978.

21. The Miller Plant is located in an area that has the following attainment/nonattainment classifications from 1980 to the present:

For NO_2, the area has been classified attainment or unclassifiable;
For SO_2, the area has been classified attainment or unclassifiable;
For PM, the area has been classified attainment or unclassifiable.
For Ozone, the area has been classified attainment or unclassifiable.

22. Southern and Mississippi Power Company operate the Watson Electric Generating Plant, a fossil fuel-fired electric utility steam generating plant located at P.O. Box 4079, Harrison County, Gulfport, Mississippi, 39502. The plant consists of 2 boiler units (Nos. 4-5) with 46,831,000 mmBTU annual heat input in 1997, and began operations in 1973.

23. The Watson Plant is located in an area that has the following attainment/nonattainment classifications from 1980 to the present:

For NO_2, the area has been classified attainment or unclassifiable;
For SO_2, the area has been classified attainment or unclassifiable;
For PM, the area has been classified attainment or unclassifiable.
For Ozone, the area has been classified attainment.

24. Southern and Gulf Power Company operate the Crist Plant, a fossil fuel-fired electric utility steam generating plant located at One Energy Place, Escambia County, Pensacola, Florida, 32520. The plant consists of 4 boiler units (Nos. 4-7) with 44,407,000 mmBTU annual heat input in 1997, and began operations in 1973.

25. The Crist Plant is located in an area that has the following attainment/nonattainment classifications from 1980 to the present:

For NO_2, the area has been classified attainment or unclassifiable;

For SO_2, the area has been classified attainment or unclassifiable;
For PM, the area has been classified attainment or unclassifiable.
For ozone, the area has been classified attainment.

26. Each of the plants identified in paragraphs 9 through 25 above emits or has the potential to emit at least 100 tons per year of NOx, SO_2 and/or PM and is a major stationary source under the Act.

VIOLATIONS

Georgia Power Plants

A. Scherer Plant

27. In 1979, the Southern and Georgia Power Company "commenced construction" as that term is defined in the 1974 EPA PSD regulations, 40 C.F.R. § 51.21((b), and the Georgia SIP, Section 7 of Georgia Department of Natural Resources Air Quality Control Rule Chapter 391-3-1-.02, on the Scherer Plant in Juliette, Georgia. Construction on Units 3 and 4 was not completed until 1987 and 1989, respectively.

28. For each of these new source constructions that occurred at the Scherer Plant, neither Southern nor Georgia Power obtained a PSD permit pursuant to Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02(7) nor a minor NSR permit pursuant to Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.03.

29. None of this new source construction falls within the exemptions found at 40 C.F.R. § 52.21(i), because neither Southern nor Georgia Power ever obtained a PSD permit under the 1974 EPA PSD regulations, and the work was not completed in a reasonable time.

30. Each of these new source constructions resulted in a net significant increase in emissions, as that term is defined in 40 C.F.R. § 52.21(b), and Section 7 of Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02, for NOx, SO_2 and/or PM from Units 3 and 4 of the Scherer Plant.

31. Therefore, Southern and Georgia Power violated and continue to violate the Georgia SIP by constructing and operating the Scherer Plant without the necessary permit required by EPA and the Georgia SIP.

32. Each of these violations exists from the date of start of construction of Units 3 and 4, respectively, until the time that the Southern Company and Georgia Power obtain the appropriate NSR permit and operate the necessary pollution control equipment to satisfy the Georgia SIP.

B. Bowen Plant

33. On numerous occasions between 1979 and the date of this Notice, Southern and Georgia Power have made "modifications" to the Bowen Plant as defined by the Georgia SIP, Section 7 of Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02. These modifications include the replacement and redesign of the economizer for Unit 2 in 1992.

34. For each of the modifications that occurred at the Bowen Plant, neither Southern nor Georgia Power obtained a PSD permit pursuant to Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02(7), nor a minor NSR permit pursuant to Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.03. In addition, for modifications after 1992, no information was provided to the permitting agency of actual emissions after the modification as required by Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02(7).

35. None of these modifications fall within the "routine maintenance, repair and replacement" exemption found at 40 C.F.R. § 52.21(b)(2)(iii)(a), or Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02(7). Each of these changes was an expensive capital expenditure performed infrequently at the plant that constituted the replacement and/or redesign of a boiler component with a long useful life. In each instance, the change was performed to increase capacity, regain lost capacity, and/or extend the life of the unit. In many instances, the original component was replaced with a component that was substantially redesigned in a manner that increased emissions. That the "routine maintenance, repair and replacement" exemption does not apply where construction activity is at issue was known to the utility industry since at least 1988 when EPA issued a widely publicized applicability determination regarding utility modifications at a Wisconsin Electric Power Co. ("WEPCO") facility. EPA's interpretation of this exemption was upheld by the court of appeals in 1990. Wisconsin Electric Power Co. v. Reilly, 893 F.2d 901 (7th Cir. 1990).

36. None of these modifications fall within the "increase in hours of operation or in the production rate" exemption found at 40 C.F.R. § 52.21(b)(2)(iii)(f), or Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02(7). This exemption is limited to stand-alone increases in operating hours or production rates, not where such increases follow or are otherwise linked to construction activity. That the hours of operation/rates of production exemption does not apply where construction activity is at issue was known to the utility industry since at least 1988 when EPA issued a widely publicized applicability determination regarding utility modifications at a Wisconsin Electric Power Co. ("WEPCO") facility. EPA's interpretation of this exemption was upheld twice by the court of appeals, in 1989 and

in 1990. Puerto Rican Cement Co. v. EPA, 889 F.2D 292 (1st Cir. 1989); Wisconsin Electric Power Co. v. Reilly, 893 F.2d 901 (7th Cir. 1990).

37. None of these modifications fall within the "demand growth" exemption found at Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02(7), because for each modification a physical change was performed which resulted in the emissions increase.

38. Each of these modifications resulted in a net significant increase in emissions, as that term is defined at Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02(7) from the Bowen Plant for NOx, SO_2 and/or PM.

39. Therefore, Southern and Georgia Power violated and continue to violate the Georgia SIP by constructing and operating modifications at the Bowen Plant without the necessary permit required by the Georgia SIP.

40. Each of these violations exists from the date of start of construction of the modification until the time that Southern and Georgia Power obtain the appropriate NSR permit and operate the necessary pollution control equipment to satisfy the Georgia SIP.

Alabama Power Plants

C. Miller Plant

41. In 1979, Southern and Alabama Power "commenced construction" as that term is defined in the 1974 EPA PSD regulations, 40 C.F.R. § 51.21(b), and the Alabama SIP, ADEM Code 335-3-14-.04, on the Miller Plant in Quinton, Alabama. Construction on Units 3 and 4 was not completed until 1989 and 1991, respectively.

42. For each of the new source constructions that occurred at the Miller Plant, neither Southern nor Alabama Power obtained a PSD permit pursuant to ADEM Code 335-3-14-.04, a nonattainment NSR permit pursuant to ADEM Code 335-3-14-.05, nor a minor NSR permit pursuant to ADEM Code 335-3-14-.01.

43. None of this new source construction falls within the exemptions found at 40 C.F.R. § 52.21(i), because neither Southern nor Alabama Power ever obtained a PSD permit under the 1974 or 1978 EPA PSD regulations, and the work was not completed in a reasonable time.

44. Each of these new source constructions resulted in a net significant increase in emissions, as that term is defined in 40 C.F.R. § 52.21(b), and ADEM Code 335-3-14-.04(2), for NOx, SO_2 and/or PM from Units 3 and 4 of the Miller Plant.

45. Therefore, Southern and Alabama Power violated and continue to violate the Alabama SIP by constructing and operating the Miller Plant without the necessary permit required by EPA and the Alabama SIP.

46. Each of these violations exists from the date of start of construction of Units 3 and 4, respectively, until the time that Southern and Alabama Power obtain the appropriate NSR permit and operate the necessary pollution control equipment to satisfy the Alabama SIP.

D. Barry, Gorgas, Gaston and Greene County Plants

47. On numerous occasions between 1979 and the date of this Notice, Southern and Alabama Power have made "modifications" of the Barry Plant as defined by the Alabama SIP, Alabama Department of Environmental Management (ADEM) Code 335-3-14-.04(2)(b)(1). These modifications include the installation of a new economizer on Unit 5 in 1993.

48. For each of the modifications that occurred at the Barry Plant, neither Southern nor Alabama Power obtained a PSD permit pursuant to ADEM Code 335-3-14-.04, a nonattainment NSR permit pursuant to ADEM Code 335-3-14-.05, nor a minor NSR permit pursuant to ADEM Rule 335-3-14-.01. In addition, no information was provided to the permitting agency of actual emissions after a modification as required by ADEM Code 335-3-14-.03.

49. On numerous occasions between 1979 and the date of this Notice, Southern and Alabama Power have made "modifications" of the Gorgas Plant as defined by the Alabama SIP, ADEM Code 335-3-14-.04(2)(b)(1). These modifications included, but are not limited to, the balanced draft conversion of Unit 10 in 1985, the installation of a new economizer on Unit 10 in 1994, and installation of redesigned air heaters on Unit 10 in 1994.

50. For each of these modifications that occurred at the Gorgas Plant, neither Southern nor Alabama Power obtained a PSD permit pursuant to ADEM Code 335-3-14-.04, a nonattainment NSR permit pursuant to ADEM Code 335-3-14-.05, nor a minor NSR permit pursuant to ADEM Rule 335-3-14-.01. In addition, for modifications after 1992, no documentation was provided to the permitting agency of actual emissions after the modification as required by ADEM Code 335-3-14-.03.

51. On numerous occasions between 1979 and the date of this Notice, Southern and Alabama Power have made "modifications" of the Gaston Plant as defined by the Alabama SIP, ADEM Code 335-3-14-.04(2)(b)(1). These modifications include the replacement of the front reheater for Unit 5 in 1991.

52. For each of the modifications that occurred at the Gaston Plant, neither the Southern Company nor Alabama Power obtained a PSD permit pursuant to ADEM Code 335-3-14-.04, a nonattainment NSR permit pursuant to ADEM Code

335-3-14-.05, nor a minor NSR permit pursuant to ADEM Rule 335-3-14-.01. In addition, for modifications after 1992, no documentation was provided to the permitting agency of actual emission after the modification as required by ADEM Code 335-3-14-.03.

53. On numerous occasions between 1979 and the date of this Notice, Southern and Alabama Power have made "modifications" of the Greene County Plant as defined by the Alabama SIP, ADEM Code 335-3-14-.04(2)(b)(1). These modifications include the replacement of the primary reheater for Unit 2 in 1989.

54. For each of the modifications that occurred at the Greene Plant, neither Southern nor Alabama Power obtained a PSD permit pursuant to ADEM Code 335-3-14-.04, a nonattainment NSR permit pursuant to ADEM Code 335-3-14-.05, nor a minor NSR permit pursuant to ADEM Rule 335-3-14-.01. In addition, for modifications after 1992, no information was provided to the permitting agency of actual emissions after the modification as required by ADEM Code 335-3-14-.03.

55. The modifications at the Barry, Gorgas, Gaston, and Greene County plants do not fall within the "routine maintenance, repair and replacement" exemption found at 40 C.F.R. § 52.21(b)(2)(iii)(a), or ADEM Code 391-3-14-.04(8). Each of these changes was an expensive capital expenditure performed infrequently at the plant that constituted the replacement and/or redesign of a boiler component with a long useful life. In each instance, the change was performed to increase capacity, regain lost capacity, and/or extend the life of the unit. In many instances, the original component was replaced with a component that was substantially redesigned in a manner that increased emissions. That the "routine maintenance, repair and replacement" exemption does not apply where construction activity is at issue was known to the utility industry since at least 1988 when EPA issued a widely publicized applicability determination regarding utility modifications at a Wisconsin Electric Power Co. ("WEPCO") facility. EPA's interpretation of this exemption was upheld by the court of appeals in 1990. Wisconsin Electric Power Co. v. Reilly, 893 F.2d 901 (7th Cir. 1990).

56. None of these modifications fall within the "increase in hours of operation or in the production rate" exemption found at 40 C.F.R. § 52.21(b)(2)(iii)(f), or ADEM Code 391-3-14-.04(8). This exemption is limited to stand-alone increases in operating hours or production rates, not where such increases follow or are otherwise linked to construction activity. That the hours of operation/rates of production exemption does not apply where construction activity is at issue was known to the utility industry since at least 1988 when EPA issued a widely publicized applicability determination regarding utility modifications at a Wisconsin Electric Power Co. ("WEPCO") facility. EPA's interpretation of this exemption was upheld twice by the court of appeals, in 1989 and

in 1990. Puerto Rican Cement Co. v. EPA, 889 F.2D 292 (1st Cir. 1989); Wisconsin Electric Power Co. v. Reilly, 893 F.2d 901 (7th Cir. 1990).

57. Each of the modifications at the Barry, Gorgas, Gaston, and Greene County plants resulted in a net significant increase in emissions, as that term is defined in ADEM Code 335-3-14-.04(2)(w), for NOx, SO_2 and/or PM.

58. Therefore, Southern and Alabama Power violated and continue to violate the Alabama SIP by constructing and operating modifications at the Barry, Gorgas, Gaston, and Greene County Plants without the necessary permit required by EPA and by the Alabama SIP.

59. Each of these violations exists from the date of start of construction of the modification until the time that Southern and Alabama Power obtain the appropriate NSR permit and operate the necessary pollution control equipment to satisfy EPA and the Alabama SIP.

E. Watson Plant

60. On numerous occasions between 1979 and the date of this Notice, Southern and Mississippi Power Company have made "modifications" of the Watson Plant as defined by the Mississippi SIP, Mississippi Commission on Natural Resources regulation APC-S-2, Section I. These modifications include the replacement of the economizer at Unit 5 in 1992.

61. For each of the modifications that occurred at the Watson Plant, neither Southern nor Mississippi Power obtained a PSD permit pursuant to Mississippi Commission on Natural Resources regulation APC-S-2, Section IV, a nonattainment NSR permit pursuant to Mississippi Commission on Natural Resources regulation APC-S-2, Section IV, nor a minor permit pursuant to Mississippi Commission on Natural Resources regulation APC-S-2, Section III.

62. None of these modifications fall within the "routine maintenance, repair and replacement" exemption found at 40 C.F.R. § 52.21(b)(2)(iii)(a), or Mississippi Commission on Natural Resources regulation APC-S-2, Section I. Each of these changes was an expensive capital expenditure performed infrequently at the plant that constituted the replacement and/or redesign of a boiler component with a long useful life. In each instance, the change was performed to increase capacity, regain lost capacity, and/or extend the life of the unit. In many instances, the original component was replaced with a component that was substantially redesigned in a manner that increased emissions. That the "routine maintenance, repair and replacement" exemption does not apply where construction activity is at issue was known to the utility industry since at least 1988 when EPA issued a widely publicized applicability determination regarding utility modifications at a Wisconsin Electric Power Co. ("WEPCO") facility. EPA's interpretation of this exemption

was upheld by the court of appeals in 1990. Wisconsin Electric Power Co. v. Reilly, 893 F.2d 901 (7th Cir. 1990).

63. None of these modifications fall within the "increase in hours of operation or in the production rate" exemption found at 40 C.F.R. § 52.21(b)(2)(iii)(f), or Mississippi Commission on Natural Resources regulation APC-S-2, Section I. This exemption is limited to stand-alone increases in operating hours or production rates, not where such increases follow or are otherwise linked to construction activity. That the hours of operation/rates of production exemption does not apply where construction activity is at issue was known to the utility industry since at least 1988 when EPA issued a widely publicized applicability determination regarding utility modifications at a Wisconsin Electric Power Co. ("WEPCO") facility. EPA's interpretation of this exemption was upheld twice by the court of appeals, in 1989 and in 1990. Puerto Rican Cement Co. v. EPA, 889 F.2D 292 (1st Cir. 1989); Wisconsin Electric Power Co. v. Reilly, 893 F.2d 901 (7th Cir. 1990).

64. Each of these modifications resulted in a net significant increase in emissions, as that term is defined in Mississippi Commission on Natural Resources regulation APC-S-2, Section I, from the Watson Plant for NOx, SO_2 and/or PM.

65. Therefore, Southern and Mississippi Power violated and continue to violate the Mississippi SIP by constructing and operating modifications at the Watson Plant without the necessary permit required by EPA and the Mississippi SIP.

66. Each of these violations exists from the date of start of construction of the modification until the time that Southern and Mississippi Power obtain the appropriate NSR permit and operate the necessary pollution control equipment to satisfy EPA and the Mississippi SIP.

F. Crist Plant

67. On numerous occasions between 1979 and the date of this Notice, Southern and Gulf Power Company have made "modifications" at the Crist Plant as defined by both the EPA PSD Regulations, 40 C.F.R. Part 51, Section 52.21(b), and Florida SIP Rule 62-212.400, F.A.C. These modifications include the replacement of the economizer at Unit 7 in 1996.

68. For each of the modifications that occurred at the Crist Plant, neither Southern nor Gulf Power obtained a PSD permit pursuant to 40 C.F.R. § 52.21 and Florida regulation 62-212.400, F.A.C., a nonattainment NSR permit pursuant to 40 C.F.R. § 52.24 and Florida regulation 62-212.500, F.A.C., nor a minor source permit pursuant to the Florida SIP, regulation 62-212.300, F.A.C. In addition, for modifications after 1992, no information was provided to the permitting agency of actual

emissions after the modification as required by 40 C.F.R. § 52.21(b)(21)(v).

69. None of these modifications fall within the "routine maintenance, repair and replacement" exemption found at 40 C.F.R. § 51.21(b)(2)(iii(a), or Florida regulation 62-210.200(183)(a)1a, F.A.C. Each of these changes was an expensive capital expenditure performed infrequently at the plant that constituted the replacement and/or redesign of a boiler component with a long useful life. In each instance, the change was performed to increase capacity, regain lost capacity, and/or extend the life of the unit. In many instances, the original component was replaced with a component that was substantially redesigned in a manner that increased emissions. That the "routine maintenance, repair and replacement" exemption does not apply where construction activity is at issue was known to the utility industry since at least 1988 when EPA issued a widely publicized applicability determination regarding utility modifications at a Wisconsin Electric Power Co. ("WEPCO") facility. EPA's interpretation of this exemption was upheld by the court of appeals in 1990. Wisconsin Electric Power Co. v. Reilly, 893 F.2d 901 (7th Cir. 1990).

70. None of these modifications fall within the "increase in hours of operation or in the production rate" exemption found at 40 C.F.R. § 52.21(b)(2)(iii)(f), or Florida regulation 62-210.200(183)(a)1a, F.A.C. This exemption is limited to stand-alone increases in operating hours or production rates, not where such increases follow or are otherwise linked to construction activity. That the hours of operation/rates of production exemption does not apply where construction activity is at issue was known to the utility industry since at least 1988 when EPA issued a widely publicized applicability determination regarding utility modifications at a Wisconsin Electric Power Co. ("WEPCO") facility. EPA's interpretation of this exemption was upheld twice by the court of appeals, in 1989 and in 1990. Puerto Rican Cement Co. v. EPA, 889 F.2D 292 (1st Cir. 1989); Wisconsin Electric Power Co. v. Reilly, 893 F.2d 901 (7th Cir. 1990).

71. None of these modifications fall within the "demand growth" exemption found at 40 C.F.R. § 52.21(b), because for each modification a physical change was performed which resulted in the emissions increase.

72. Each of these modifications resulted in a net significant increase in emissions, as that term is defined in 40 C.F.R. § 51.21(b), from the Crist Plant for NOx, SO_2 and/or PM.

73. Therefore, Southern and Gulf Power violated and continue to violate the Florida SIP by constructing and operating modifications at the Crist Plant without the necessary permit required by the EPA PSD regulations and the Florida SIP.

74. Each of these violations exists from the date of start of construction of the modification until the time that Southern and Gulf Power obtain the appropriate NSR permit and operate the necessary pollution control equipment to satisfy the EPA PSD regulations and the Florida SIP.

M. Plant Kraft

75. On numerous occasions between 1979 and the date of this Notice, Southern and Savannah Power Company have made "modifications" at the Kraft Plant as defined by the Georgia SIP, Section 7 of Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02. These modifications include the balanced draft conversion of Unit 3 in 1985.

76. For each of the modifications that occurred at the Kraft Plant, neither Southern nor Savannah Power obtained a PSD permit pursuant to Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02(7), a nonattainment NSR permit pursuant to Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.03, nor a minor NSR permit pursuant to Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.03. In addition, for modifications after 1992, no information was provided to the permitting agency of actual emissions after the modification as required by Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02(7).

77. None of these modifications fall within the "routine maintenance, repair and replacement" exemption found at 40 C.F.R. § 52.21(b)(2)(iii)(a), or Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02(7). Each of these changes was an expensive capital expenditure performed infrequently at the plant that constituted the replacement and/or redesign of a boiler component with a long useful life. In each instance, the change was performed to increase capacity, regain lost capacity, and/or extend the life of the unit. In many instances, the original component was replaced with a component that was substantially redesigned in a manner that increased emissions. That the "routine maintenance, repair and replacement" exemption does not apply where construction activity is at issue was known to the utility industry since at least 1988 when EPA issued a widely publicized applicability determination regarding utility modifications at a Wisconsin Electric Power Co. ("WEPCO") facility. EPA's interpretation of this exemption was upheld by the court of appeals in 1990. Wisconsin Electric Power Co. v. Reilly, 893 F.2d 901 (7th Cir. 1990).

78. None of these modifications fall within the "increase in hours of operation or in the production rate" exemption found at 40 C.F.R. § 52.21(b)(2)(iii)(f), or Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02(7). This exemption is limited to stand-alone increases in operating hours or production rates, not where such increases follow or are otherwise linked to construction activity. That the hours of operation/rates of production exemption does not apply

where construction activity is at issue was known to the utility industry since at least 1988 when EPA issued a widely publicized applicability determination regarding utility modifications at a Wisconsin Electric Power Co. ("WEPCO") facility. EPA's interpretation of this exemption was upheld twice by the court of appeals, in 1989 and in 1990. Puerto Rican Cement Co. v. EPA, 889 F.2D 292 (1st Cir. 1989); Wisconsin Electric Power Co. v. Reilly, 893 F.2d 901 (7th Cir. 1990).

79. None of these modifications fall within the "demand growth" exemption found at Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02(7), because for each modification a physical change was performed which resulted in the emissions increase.

80. Each of these modifications resulted in a net significant increase in emissions, as that term is defined within Georgia Department of Natural Resources Air Quality Control Rule 391-3-1-.02(7), from the Kraft Plant for NOx, SO_2 and/or PM.

81. Therefore, Southern and Savannah Power violated and continue to violate the Georgia SIP by constructing and operating modifications at the Kraft Plant without the necessary permit required by the Georgia SIP.

82. Each of these violations exists from the date of start of construction of the modification until the time that Southern and Savannah Power obtain the appropriate NSR permit and operate the necessary pollution control equipment to satisfy the Georgia SIP.

ENFORCEMENT

Section 113(a)(1) of the Act provides that at any time after the expiration of 30 days following the date of the issuance of this NOV, the Regional Administrator may, without regard to the period of violation, issue an order requiring compliance with the requirements of the state implementation plan or permit, and/or bring a civil action pursuant to Section 113(b) for injunctive relief and/or civil penalties of not more than $25,000 per day for each violation on or before January 30, 1997, and no more than $27,500 per day for each violation after January 30, 1997.

OPPORTUNITY FOR CONFERENCE

Respondents may, upon request, confer with EPA. The conference will enable Respondents to present evidence bearing on the finding of violation, on the nature of violation, and on any efforts it may have taken or proposes to take to achieve compliance. Respondents have the right to be represented by counsel. A request for a conference must be made within 10 days of receipt of this NOV, and the request for a conference or other inquiries concerning the NOV should be make in writing to:

Charles V. Mikalian
Associate Regional Counsel
Environmental Accountability Division
U.S. EPA - Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
404-562-9575

By offering the opportunity for a conference or participating in one, EPA does not waive or limit its right to any remedy available under the Act.

Effective Date

This NOV shall become effective immediately upon issuance.

11/2/99
Date

for John H. Hankinson, Jr.
Regional Administrator
EPA, Region 4

GULF POWER COMPANY

ONE ENERGY PLACE
PENSACOLA, FLORIDA 32520-0328

To: Jonathan Holtom

Company: FDEP

Phone:

Fax: 850 922 6979

From: Dusain Walters

Company: Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Phone: 850 444-6527

Fax: 850.444.6217

Date: Nov 24, 1999

Pages including this cover page: 2

Comments: DR certification of NOx Acq. Plan.

Charles O. McCrary
Chief Production Officer
President -
Southern Company Generation

600 North 18th Street / 15N-8170
Post Office Box 2641
Birmingham, Alabama 35291

Tel 205.257.2245
Fax 205.257.5019

November 23, 1999

SOUTHERN COMPANY
Energy to Serve Your World™

Mr. Clair H. Fancy, P.E.
Chief, Bureau of Air Regulation
Air Resources Management Division
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399 – 2400

Dear Mr. Fancy:

This letter is provided in accordance with the requirements outlined in Section IV Acid Rain Part and Appendix CP.-1 of the Crist Electric Generating Plant, Scholz Electric Generating Plant, and the Lansing Smith Electric Generating Plant Title V permits. On December 8, 1997, Southern Company submitted a Phase II NOx Averaging Plan to the States of Alabama, Florida, Georgia, and Mississippi and to Jefferson County, Alabama, with copies to the U.S. Environmental Protection Agency at Region IV and the Acid Rain Division. The plan was updated on April 15, 1999, from 71 to 75 units operated by Southern Company across the four state region. Following several comments from EPA Region IV and a few administrative changes, the plan was signed and resubmitted on July 23, 1999.

The initial Southern Company NOx averaging plan has been approved by the Alabama Department of Environmental Management, Georgia Environmental Protection Division, Mississippi Department of Environmental Quality, and the Jefferson County, Alabama, Department of Health. In conjunction with final approval of the averaging plan, the agencies have or are in the process of updating permits for these units per the November 18, 1999, letter to you from Mr. R. Douglas Neeley, U.S. Environmental Protection Agency.

This certification is based on information and belief formed after reasonable inquiry. To the best of my knowledge, the statements and information in this document are true, accurate, and complete as required by 62-213.420 (4) F.A.C.

If you have questions about the plan or the status of approval, please contact Mr. Danny Herrin, Manager, Clean Air Compliance, Southern Company Generation, at (205) 257-6468.

Sincerely,

Charles O McCrary

cc: Ronald W. Gore, Alabama Department of Environmental Management
Ronald C. Methier, Georgia Environmental Protection Division
Dwight Wylie, Mississippi Department of Environmental Quality
James L. Carroll, Jefferson County Department of Health
R. Doug Neeley, U.S. Environmental Protection Agency
Robert Miller, U.S. Environmental Protection Agency

Copy: D. Waters - Gulf
J. Hunter - FPC
11/24 E. Middlemas - NWD
B. Thomas - SW dist
J. Campbell - HCEPC
P. Comer - DEP
H. Rhodes - DARM

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

NOV 17 1999

4APT-ARB

Mr. Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Air Resources Management Division
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

This letter is to follow up on our recent conversation regarding the approval process for the multi-state Phase II Acid Rain NOx Averaging Plan submitted by participating Southern Company plants to their respective State permitting authorities. Our conversation focused on the status of the proposed averaging plan, should the process of approval through the issuance of permits incorporating the plan not be completed by all the relevant permitting authorities by the Phase II effective date of January 1, 2000.

It is our understanding that the Florida Department of Environmental Protection (FDEP) has set a goal to complete the title V permitting process (i.e., finalize the title V permits) for the Gulf Power plants participating in the Southern Company Phase II NOx Averaging Plan by the end of this year. There remains the possibility, however, due to title V permitting delays that the FDEP may not approve Southern Company's plan and incorporate the plan into final title V permits by the end of this year.

The Acid Rain Division of the Environmental Protection Agency (EPA) considers a compliance plan submitted with an Acid Rain permit application to be part of the Acid Rain permit application (see 40 CFR 72.31(c)). This would include a Phase II NO_x Averaging Plan; however, it would not include a petition for an alternative emission limitation period, a final alternative emission limitation or a renewal of a final alternative emission limitation. Therefore, the permit application shield provided in the Acid Rain regulations extends to a Phase II NOx Averaging Plan that is timely and complete (see 40 CFR 72.32(b)). Further, a complete Phase II NOx Averaging Plan is binding on the owners and operators until issuance or denial of the Acid Rain permit (see 40 CFR 72.32(c)). Under these rule provisions the units included in the Southern Company Phase II NOx Averaging Plan are required to operate in accordance with the terms of the averaging plan until the final approval of the plan (i.e., when all permitting authorities with jurisdiction over the units in the plan have approved the plan) (see 40 CFR 72.40(b)(2)).

If you have any questions or concerns regarding this matter, please contact Jenny Jachim of the EPA Region 4 staff at (404) 562-9126.

Sincerely,

R. Douglas Neeley
Chief
Air & Radiation Technology Branch
Air, Pesticides and Toxics
Management Branch

cc: W. Danny Herrin, Southern Company Services, Inc.
Ronald W. Gore, Alabama Department of Environmental Management
Ronald C. Methier, Environmental Protection Division
James L. Carroll, Jefferson County Department of Health
Dwight Alpern, Acid Rain Division
Robert Miller, Acid Rain Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

Great work Jonathan!

OCT 15 1999

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL # of pages ▸ 2

To Scott Sheplak	From Eliz. Bartlett
Dept./Agency FDEP	Phone # (404) 562-9122
Fax # (850) 922-6979	Fax # (404) 562-9095

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

4APT-ARB

Howard L. Rhodes, Director
Department of Environmental Protection
Division of Air Resources Management Division
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: EPA's Objection to Proposed Title V Permit for
Gulf Power - Crist Plant, Permit Number 0330045-001-AV

Dear Mr. Rhodes:

The purpose of this letter is to acknowledge the receipt of the State of Florida's proposed changes to the Gulf Power - Crist Plant proposed title V permit, dated September 15, 1999, which was the subject of a U.S. Environmental Protection Agency (EPA) title V objection on July 22, 1999. EPA has completed its review of the proposed changes to the permit and believes that the State has adequately addressed each of the issues enumerated in the objection. As agreed through phone conversations between Elizabeth Bartlett of the Operating Source Section, and Jonathan Holtom of the Bureau of Air Regulation, additional permit language will be added to address Objection Items 4 and 5. Therefore, EPA considers the objection to be resolved. Once the state's proposed changes and the changes below are incorporated into the permit, the State may proceed with permit issuance.

To resolve Objection Item 4, new condition B.38 will be revised to include the underlined language as follows: "The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions *and, where practicable, shall be performed while operating at conditions representative of those showing greater than 20% opacity*." New condition C.39 will also be revised to include the underlined language as follows: "The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions *and, where practicable, shall be performed while operating at conditions representative of those showing greater than 30% opacity*."

To resolve Objection Item 5, the Statement of Basis will be revised to include language which explains that compliance with the 1,475 ton per year particulate matter limit for Unit 6 will be assured based on historical particulate matter emission test results, even though "potential to emit" calculations based on the most recent heat input rates correspond to an emisison rate of 1623 tons per year.

We commend the efforts of your staff for facilitating the resolution of the permit issues. If you have any questions about this letter, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141.

Sincerely,

Winston A. Smith
Director
Air, Pesticides & Toxics
Management Division

cc: Mr. James O. Vick, Gulf Power
Mr. G. Dwain Waters, Gulf Power

FAX TRANSMITTAL

TO: Elizabeth Bartlett

FAX NUMBER: 404-562-9095

FROM: Jonathan Holtom

DATE: October 13, 1999

RE: Peridic Monitoing Condition

This is my original language for this condition. Let me know what you think.

Periodic Monitoring Requirements. Periodic monitoring for particulate matter shall be COMs. For any calendar quarter in which more than five percent of the COMs readings show 20% or greater opacity (excluding start-up, shut-down and periods of COMs outages), a steady state particulate matter stack test shall be performed and submitted within the following calendar quarter. The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions and, where possible, shall be performed while operating at conditions representative to those showing greater than 20% opacity. Units are not required to be brought on-line solely for the purpose of performing this special compliance test. If the unit does not operate in the following quarter, the special compliance test may be postponed until the unit is brought back on-line. Once back on-line, the special test shall be performed within 20 days. [Rule 62-213.440(4), F.A.C.]

If you have any questions, please do not hesitate to call me at (850) 921-9531.

909-562-9095

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 11-Oct-1999 09:04am
From: Waters, Glenn D.
GDWATERS@southernco.com
Dept:
Tel No:

To: 'Jonathan Holtom TAL 850/921-9531 G (Jonathan.Holtom@dep.state.fl.us)
CC: Clair H. Fancy (E-mail) (fancy_c@dep.state.fl.us)

Subject: Scholz/Crist Objection Response

Yes, it is correct that I have talked with David McNeal but I wouldn't agree that I have accepted that testing should be conducted at levels higher than 20% opacity. I was just silent because I was caught by total surprise.

Gulf Power believes these conditions are not normal operating conditions that state particulate limits are required to be met. In order to test at 20% opacity or greater for a 3 hour test would mean that the unit would have to be artificially manipulated through processes like reducing the number and/or the effectiveness of ESP fields to operate. These conditions are not anywhere near "normal operating conditions". Under the agreement as written, Gulf Power would have to meet the state particulate standard of .1 lb/mbtu once a quarter if opacity > 20% (30 for Crist 7) other than startup/shutdown is greater than 5% time on line for the quarter. The state/EPA should not try to make a source test under abnormal operating conditions to provide compliance to a standard. This is periodic monitoring not compliance assurance monitoring (CAM). This condition goes to far. Gulf Power can not accept such a condition. Please discuss this with Clair. We need to settle this before we work further on the Scholz language.

> -----Original Message-----
> From: Jonathan Holtom TAL 850/921-9531 GIC: 286
> [SMTP:Jonathan.Holtom@dep.state.fl.us]
> Sent: Friday, October 08, 1999 3:12 PM
> To: Waters, Glenn D.
> Subject: Re: Scholz Objection Response
> Sensitivity: Confidential
>
> Thanks for the correction on the SOB. I copied it from Crist, obviously.
> I spoke with EPA this afternoon. They say that the periodic monitoring
> condition needs the language put back in that says the indicated quarterly
> tests must be performed at levels of operation representative of the
> conditions
> that showed >20% V.E. I was told that David McNeel already spoke to you
> about
> this issue and that you are accepting the change. It appears that this is
> the
> only real issue holding up the Crist resolution. I'll be talking with
> them
> again on Tuesday morning and I'll let you now where we stand. Have a good
> weekend!
>
> I'll look forward to your submission
> Your draft looks good. I did find a couple of typos. (See Statement of

> Basis - Should be unit 1 & 2 instead of 4,5,6 7) Let me correct these and
> I'll route it back to you as an official response from Gulf on Monday. I
> need to OK this with my boss later today or Monday. Thanks for working
> this
> up.

RFC-822-headers:
Received: from epic5.dep.state.fl.us ([199.73.143.30])
 by mail.epic1.dep.state.fl.us (PMDF V5.2-32 #37976)
 with ESMTP id <01JH03TK5H080019XE@mail.epic1.dep.state.fl.us>; Mon,
 11 Oct 1999 08:59:26 EDT
Received: from alxapex03.southernco.com ([146.126.51.51])
 by mail.epic5.dep.state.fl.us (PMDF V5.2-32 #31508)
 with ESMTP id <01JH03X0BK5A000NK8@mail.epic5.dep.state.fl.us>; Mon,
 11 Oct 1999 09:02:14 -0400 (EDT)
Received: by alxapex03.southernco.com with Internet Mail Service (5.5.2448.0)
	id <42P1VFS7>; Mon, 11 Oct 1999 08:01:29 -0500
X-Mailer: Internet Mail Service (5.5.2448.0)

INTEROFFICE MEMORANDUM

Date: 15-Sep-1999 01:53pm
From: Waters, Glenn D.
GDWATERS@southernco.com
Dept:
Tel No:

To: Scott M. Sheplak (E-mail) (sheplak_s@dep.state.fl.us)

Subject: FW: Crist Objection Letter Comments

> -----Original Message-----
> From: Waters, Glenn D.
> Sent: Wednesday, September 15, 1999 8:46 AM
> To: Clair H. Fancy (E-mail); Jonathan Holtom (E-mail)
> Subject: Crist Objection Letter Comments
>
> Per our conversation this morning, below are several comments and
> suggestions on FDEP's letter to EPA regarding the Crist Objection Letter.
>
> 1. Cover Page : Check spelling of David McNeal.
>
> 2. Add a permit note under conditions B.17 and C.17 to reflect the same
> language as your comment under EPA Comment #2, i.e."We have agreed to
> accept the test done during the annual RATA as satisfaction of this
> requirement, provided all other testing requirements specified in the
> permit are met."
>
> 3. Under EPA Comment #4. B.38 language and C.39 language: Delete "and
> where possible, shall be performed while operating at conditions
> representative to those showing greater than 20%(30% for Crist 7)
> opacity."
>
>

Gulf Power Company – Crist Electric Generating Plant

Department Responses to EPA Objections
Initial Title V Permit

Southern changes made in letter to USEPA.

The following responses address the EPA comments that Gulf Power has indicated as needing Department clarification.

EPA Comment Number 2.

Compliance Testing: The permit is not clear about the frequency of testing that the facility needs to follow for particulate matter (PM) and visible emissions (VE). Condition A.15 states that the source must conduct annual testing for PM and VE. However, conditions A.21, A.27, A.28, and A.29 establish that the facility will conduct testing once a year if fuel oil is burned for more than 400 hours, and no testing is required otherwise. The permit needs to be clear about which one of these conditions the facility must follow to demonstrate compliance with the PM and VE limits. The same comment applies to conditions B.17 and B.26, and C.17 and C.26. Additionally, the permit needs to include the regulatory basis for conditions A.15, B.17 and C.17.

Furthermore, EPA is concerned with the interaction of these conditions. The statement of basis indicates that the source will conduct annual testing for particulate matter for units 4-7. Therefore, we do not understand why the testing waivers are included for these units since they seem not to apply.

In response to this comment, condition A.15. is changed:

From:
A.15. Annual Tests Required. Units -001, -002 and -003 must conduct annual testing for particulate matter and visible emissions in accordance with the requirements listed below.

To:
A.15. Annual Tests Required. Except as provided in Specific Conditions **A.27. – 29.**, units -001, -002 and -003 shall conduct annual testing for particulate matter and visible emissions in accordance with the requirements listed below.
[Rule 62-297.310(7)(a)4., F.A.C.]

In addition, the following rule citation will be added to conditions B.17. and C.17.: [Rule 62-297.310(7)(a)4., F.A.C.]. ~~Furthermore, the Department does not agree with Gulf Power's opinion that the requirement to perform an SO_2 test should be deleted from conditions B.17. and C.17.~~ (The annual test is required by Rule 62-297.310(7), F.A.C. ~~However, we have agreed to accept the test~~ done during the annual RATA as satisfaction of this requirement, provided all other testing requirements specified in the permit are met.

EPA Comment Number 3.

Appropriate Averaging Times: In order for the emissions standard for particulate matter contained in conditions A.7, B.7, and C.7 to be practicably enforceable, the appropriate averaging time must be specified in the permit. An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance.

As a result of this comment, the following permitting note has been added following specific conditions A.7., B.7. & C.7.:
{Permitting Note: The averaging time shall correspond to the cumulative sample time, as specified in the reference test method (see specific condition **A.18., B.21., C.21. (as appropriate)**).}

EPA Comment Number 4.

Periodic Monitoring: Conditions B.17 and C.17 of the permit require the source to conduct annual testing for particulate matter. The statement of basis for the permit states that this testing frequency "is justified by the low emission rate documented in previous emissions tests while firing coal" and that the "Department has determined that sources with emissions less than half of the effective standard shall test annually."

While EPA has in the past accepted this approach as adequate periodic monitoring for particulate matter, it has done so only for uncontrolled natural gas and fuel oil fired units. The units addressed in conditions B.17 and C.17 use add-on control equipment to comply with the applicable particulate matter standard. In order to provide reasonable assurance of compliance, the results of an annual stack testing will have to be supplemented with additional monitoring. Furthermore, the results of an annual test alone would not constitute an adequate basis for the annual certification of compliance that the facility will have to submit for these units.

The most common approach to addressing periodic monitoring for particulate emission limits on units with add-on controls is to establish either an opacity or a control device parameter indicator range that would provide evidence of proper control device operation. The primary goal of such monitoring is to provide reasonable assurance of compliance, and one way of achieving this goal is to use opacity data or control device operating parameter data from previous successful compliance tests to identify a range of values that has corresponded to compliance in the past. Operating within the range of values identified in this manner would provide assurance that the control device is operating properly and would serve as the basis for an annual compliance certification. Depending upon the margin of compliance during the tests used to establish the opacity or control device indicator range, going outside the range could represent either a period of time when an exceedance of the applicable standard is likely or it could represent a trigger for initiating corrective action to prevent an exceedance of the standard. In order to avoid any confusion regarding the consequences of going outside the indicator range, the permit must clearly state if doing so is evidence that a standard has been exceeded and must specify whether corrective action must be taken when a source operates outside the established indicator range.

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[Rule 62-213.440(4), F.A.C.]

C.39. Periodic Monitoring Requirements. Periodic monitoring for particulate matter shall be COMs. For any calendar quarter in which more than five percent of the COMs readings show 20% or greater opacity for unit 6 and 30% or greater opacity for unit 7 (excluding start-up, shut-down and periods of COMs outages), a steady state particulate matter stack test shall be performed and submitted within the following calendar quarter. The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions~~, and, where possible, shall be performed while operating at conditions representative to those showing greater than 20% opacity (30% for unit 7)~~. Units are not required to be brought on-line solely for the purpose of performing this special compliance test. If the unit does not operate in the following quarter, the special compliance test may be postponed until the unit is brought back on-line. Once back on-line, the special test shall be performed within 20 days.
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DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1. Scott.
2. _____
3. _____
4. _____
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:

Located at
O:\BAR\Title IV\Jonathan\
Permits\GPCRiSK\
Revised Proposed\...
- objresp.
- Revised Prop. SOB.

I already Emailed a copy to Dwain. If you are happy with it, have Clair Sign and send it to ~~DEP~~ EPA. EMail to Elizabeth Bentlett. *
I'll try to check in in the morning. Be back in office on Friday. Clair is reviewing Smith. Hopefully it is ready to mail.

FROM: Jonathan DATE: 9/14 PHONE: _____

DEP 15-026 (12/93)

* Be Sure to include hard copy of Gulf Power's response, Thanks.

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

September 15, 1999

Mr. R. Douglas Neeley, Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics Management Division
United States Environmental Protection Agency
Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8909

Re: Proposed Changes to the Proposed Title V Permit for the Gulf Power – Crist Plant, to Address EPA Objections

Dear Mr. Neeley:

This letter is to document changes that Gulf Power Company and the Department propose to satisfy EPA Region 4 objections to Florida's Proposed Title V permit for the Gulf Power -- Crist Plant. These objections were detailed in a letter from EPA Region 4 dated July 22, 1999. Enclosed, please find a hard copy of the response from Gulf Power that was faxed to you on Tuesday, September 7, the Department's responses to your comments that Gulf Power identified as needing Department clarification, and a new Statement of Basis.

Based on the outcome of our teleconference on Friday, September 10, with David McNiel and Elizabeth Bartlett, of your staff, we believe that the following responses will satisfy your concerns. Resolution of this objection is crucial in order for Gulf Power to receive a Final Title V permit, including the Southern Company's multi-state NO_X averaging plan, by December 31, 1999. Upon your concurrence with the responses listed below, the Department will issue a Final Title V permit that contains the changes as indicated.

Should you have any questions regarding this submission, please contact Mr. Jonathan Holtom, P.E., at (850) 921-9531.

Sincerely,

C.H. Fancy, P.E.
Chief
Bureau of Air Regulation

Enclosures.

cc: Mr. James Vick, Gulf Power Company
Mr. G. Dwain Waters, Gulf Power Company (E-mail)
Ms. Elizabeth Bartlett, USEPA Region 4 (E-mail)

CHF/jh

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The most common approach to addressing periodic monitoring for particulate emission limits on units with add-on controls is to establish either an opacity or a control device parameter indicator range that would provide evidence of proper control device operation. The primary goal of such monitoring is to provide reasonable assurance of compliance, and one way of achieving this goal is to use opacity data or control device operating parameter data from previous successful compliance tests to identify a range of values that has corresponded to compliance in the past. Operating within the range of values identified in this manner would provide assurance that the control device is operating properly and would serve as the basis for an annual compliance certification. Depending upon the margin of compliance during the tests used to establish the opacity or control device indicator range, going outside the range could represent either a period of time when an exceedance of the applicable standard is likely or it could represent a trigger for initiating corrective action to prevent an exceedance of the standard. In order to avoid any confusion regarding the consequences of going outside the indicator range, the permit must clearly state if doing so is evidence that a standard has been exceeded and must specify whether corrective action must be taken when a source operates outside the established indicator range.

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Jonathan

Department of Environmental Protection

Jeb Bush
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Twin Towers Office Building
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September 15, 1999

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Enclosures

cc: Mr. James Vick, Gulf Power Company
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Ms. Elizabeth Bartlett, USEPA Region 4 (E-mail)

CHF/jh

Gulf Power Company – Crist Electric Generating Plant

Department Responses to EPA Objections
Initial Title V Permit

The following responses address the EPA comments that Gulf Power has indicated as needing Department clarification.

EPA Comment Number 2.

Compliance Testing: The permit is not clear about the frequency of testing that the facility needs to follow for particulate matter (PM) and visible emissions (VE). Condition A.15 states that the source must conduct annual testing for PM and VE. However, conditions A.21, A.27, A.28, and A.29 establish that the facility will conduct testing once a year if fuel oil is burned for more than 400 hours, and no testing is required otherwise. The permit needs to be clear about which one of these conditions the facility must follow to demonstrate compliance with the PM and VE limits. The same comment applies to conditions B.17 and B.26, and C.17 and C.26. Additionally, the permit needs to include the regulatory basis for conditions A.15, B.17 and C.17.

Furthermore, EPA is concerned with the interaction of these conditions. The statement of basis indicates that the source will conduct annual testing for particulate matter for units 4-7. Therefore, we do not understand why the testing waivers are included for these units since they seem not to apply.

In response to this comment, condition A.15. is changed:

From:
A.15. Annual Tests Required. Units -001, -002 and -003 must conduct annual testing for particulate matter and visible emissions in accordance with the requirements listed below.

To:
A.15. Annual Tests Required. Except as provided in Specific Conditions **A.27. – 29.**, units -001, -002 and -003 shall conduct annual testing for particulate matter and visible emissions in accordance with the requirements listed below.
[Rule 62-297.310(7)(a)4., F.A.C.]

In addition, the following rule citation will be added to conditions B.17. and C.17.: [Rule 62-297.310(7)(a)4., F.A.C.]. The following permitting note will be added to conditions B.17. and C.17.: {Permitting Note: The annual SO_2 test that is required by Rule 62-297.310(7), F.A.C., can be done during the annual RATA as satisfaction of this requirement, provided all other testing requirements specified in the permit are met.}

EPA Comment Number 3.

Appropriate Averaging Times: In order for the emissions standard for particulate matter contained in conditions A.7, B.7, and C.7 to be practicably enforceable, the appropriate averaging time must be specified in the permit. An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance.

As a result of this comment, the following permitting note has been added following specific conditions A.7., B.7. & C.7.:
{Permitting Note: The averaging time shall correspond to the cumulative sample time, as specified in the reference test method (see specific condition **A.18., B.21., C.21. (as appropriate)**).}

EPA Comment Number 4.

Periodic Monitoring: Conditions B.17 and C.17 of the permit require the source to conduct annual testing for particulate matter. The statement of basis for the permit states that this testing frequency "is justified by the low emission rate documented in previous emissions tests while firing coal" and that the "Department has determined that sources with emissions less than half of the effective standard shall test annually."

While EPA has in the past accepted this approach as adequate periodic monitoring for particulate matter, it has done so only for uncontrolled natural gas and fuel oil fired units. The units addressed in conditions B.17 and C.17 use add-on control equipment to comply with the applicable particulate matter standard. In order to provide reasonable assurance of compliance, the results of an annual stack testing will have to be supplemented with additional monitoring. Furthermore, the results of an annual test alone would not constitute an adequate basis for the annual certification of compliance that the facility will have to submit for these units.

The most common approach to addressing periodic monitoring for particulate emission limits on units with add-on controls is to establish either an opacity or a control device parameter indicator range that would provide evidence of proper control device operation. The primary goal of such monitoring is to provide reasonable assurance of compliance, and one way of achieving this goal is to use opacity data or control device operating parameter data from previous successful compliance tests to identify a range of values that has corresponded to compliance in the past. Operating within the range of values identified in this manner would provide assurance that the control device is operating properly and would serve as the basis for an annual compliance certification. Depending upon the margin of compliance during the tests used to establish the opacity or control device indicator range, going outside the range could represent either a period of time when an exceedance of the applicable standard is likely or it could represent a trigger for initiating corrective action to prevent an exceedance of the standard. In order to avoid any confusion regarding the consequences of going outside the indicator range, the permit must clearly state if doing so is evidence that a standard has been exceeded and must specify whether corrective action must be taken when a source operates outside the established indicator range.

The Department does not agree with Gulf Power's response. Instead, we propose that the following two new conditions be added to the permit:

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[Rule 62-213.440(4), F.A.C.]

C.39. Periodic Monitoring Requirements. Periodic monitoring for particulate matter shall be COMs. For any calendar quarter in which more than five percent of the COMs readings show 20% or greater opacity for unit 6 and 30% or greater opacity for unit 7 (excluding start-up, shut-down and periods of COMs outages), a steady state particulate matter stack test shall be performed and submitted within the following calendar quarter. The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions. Units are not required to be brought on-line solely for the purpose of performing this special compliance test. If the unit does not operate in the following quarter, the special compliance test may be postponed until the unit is brought back on-line. Once back on-line, the special test shall be performed within 20 days.
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For units 4, 5 and 6, 20% opacity is an acceptable trigger for the need to perform a special compliance test. However, using 30% opacity as the benchmark for additional testing at unit 7 is justified based on a linear extrapolation of historical particulate matter test vs. opacity data that indicates compliance with the particulate matter limit at 30% opacity. It has been requested by Gulf Power due to the inherent tendencies of this unit to routinely operate at levels above 20% opacity.

EPA Comment Number 8.

Acid Rain: Please note that the Phase II Averaging Plan submitted by the source is an enforceable part of this permit. The Averaging Plan, Phase II NO_x Compliance and Phase II Acid Rain Permit Application should be referenced and attached as enforceable parts of the Title V permit. We note that Phase II permit applications, Phase II NO_x Compliance Plans and the Phase II Averaging Plans submitted by this source are referenced in Section IV, Condition A.1. of the proposed permit and on page 1 of the permit in a section entitled, "Referenced attachments made part of this permit". However, the forms and the referenced dates of these two parts of the permit do not coincide and do not appear to reflect the complete signed forms as submitted by the source. It is

important that the specific forms and applications (signed and dated by the designated representative) be attached to the permit as enforceable parts of the permit and that they are completely and accurately referenced.

In response to this comment, the referenced attachment dates have been updated to reflect the correct submission dates. The Acid Rain forms that will be included in the Title V permit are as follows:

Phase II Acid Rain Permit Application/Compliance Plan Received December 18, 1995
Phase II Acid Rain NO_X Compliance Plan Received December 22, 1997
Revised Phase II Acid Rain NO_X Averaging Plan Received August 24, 1999

EPA Comment Number 9.

Acid Rain: The language contained in section 70.6(a)(1)(ii), regarding Acid Rain Program requirements in title V is not addressed in the Acid Rain Part of the permit and does not appear to be included in elsewhere in the body of the proposed permit. This condition needs to be added to the proposed title V permit for this source.

As a result of this comment, two new conditions have been added to the Acid Rain section. Th e remainder of the existing conditions have been renumbered accordingly.

A.5. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400, F.A.C.
[40 CFR 70.6(a)(4)(i); and, Rule 62-213.440(1)(c)1., F.A.C.]

A.6. Where an applicable requirement of the Act is more stringent than applicable regulations promulgated under Title IV of the Act, both provisions shall be incorporated into the permit and shall be enforceable by the Administrator.
[40 CFR 70.6(a)(1)(ii); and, Rule 62-210.200, F.A.C., Definitions – Applicable Requirements.]

EPA General Comment Number 1.

Section II, condition 1: Please make sure that Appendix TV-2 reflects the updated version of condition 51, as it is contained in Appendix TV-3.

As a result of this comment, Appendix TV-2 has been replaced with Appendix TV-3 and all references have been updated.

EPA General Comment Number 2.

Section II, condition 12: Please correct the address, telephone and fax number for the Air Enforcement Section. All required reports should be sent to the Air Enforcement Section (AES), not the Operating Source Section. The correct telephone and fax numbers for AES are 404/562-9055 and 404/562-9163, respectively. Additionally, please delete the information concerning the submission of Acid Rain information. Region 4 does not have an Acid Rain Section.

As a result of this comment, the requested changes have been made.

EPA General Comment Number 3.

See new Statement of Basis, attached.

EPA General Comment Number 4.

Section IV, Acid Rain Part: Please note that the allowances allocated to the Crist Plant units 4,5,6,7, as indicated under Section IV, Condition A.2 of the proposed permit have been changed. This revision was published in the Federal Register on September 28, 1998 (Vol. 63 No. 187, pp 51706-51765). We recommend that the allowances that are indicated for these units be adjusted to reflect the revised allocation.

As a result of this comment, the Acid Rain section has been updated to reflect the revised allowances as follows:

Unit Number	Phase II Allowances

1	35
2	3
3	4
4	2467
5	2430
6	8396
7	12522

EPA General Comment Number 5.

Appendix CP-1, Alternate Phase II NO_X Compliance Plan, was only intended to address the initial issuance of the Title V/Acid Rain permit. It does not address any future revisions to the averaging plan. Future revisions will be subject to a different compliance plan.

STATEMENT OF BASIS

Gulf Power Company
Crist Electric Generating Plant
Facility ID No.: 0330045
Escambia County

Initial Title V Air Operation Permit
PROPOSED Permit No.: 0330045-001-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named 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 permitting authority, in accordance with the terms and conditions of this permit.

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. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

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. The Department feels that additional periodic monitoring for particulate matter emissions is not needed for these units. For each of the past ten years, these units have burned fuel oil for less than 400 hours. Under the approval granted by an alternate sampling procedure (ASP 97-B-01) accepted by EPA, as long as these units do not burn liquid or solid fuel for greater than 400 hours per year, annual particulate matter tests are not required.

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. Particulate matter emissions from unit -006 are controlled by a cold side electrostatic precipitator (Wheelabrator Model # HaRDE). Particulate matter 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.

Periodic monitoring for particulate matter will be through the use of COMs. For any calendar quarter in which more than five percent of the COMs readings on units 4, 5 and 6 show 20% or greater opacity (30% for unit 7), a steady-state particulate matter stack test will be required to be performed and submitted within the following calendar quarter. If the unit does not operate in the following quarter, it shall be tested within 20 days of coming back on-line. These units are subject to a steady-state PM emission limit of 0.1 lb/MMBtu, and 0.3 lb/MMBtu for soot blowing. They are also subject to an opacity standard of 40%. The applicant has presented historical PM test results which show that the steady-state and soot blowing average results are significantly less than the applicable standards. A five year average of results of particulate matter emission testing, in lb/MMBtu, for this facility is given below:

Unit #	Steady-state	Soot-blowing
4	0.011	0.016
5	0.039	0.035
6	0.007	0.010
7	0.041	0.062

The Department and EPA have previously determined that sources without controls, whose emissions are less than half of the applicable standard, shall test annually. Given the historically low documented PM emissions combined with the company's agreement to conduct a PM stack test following any quarter in which their COMs data shows that greater than 5% of the readings are greater 20% (30% for unit 7), the Department believes that periodic monitoring for particulate matter is more than reasonably addressed. Using 30% opacity as the benchmark for additional testing at unit 7 is justified based on a linear extrapolation of historical particulate test vs. opacity data that indicates compliance with the particulate limit at 30% opacity. It has been requested by Gulf Power due to the inherent tendencies of this unit to routinely operate at levels above 20% opacity.

Units 4, 5, 6 and 7 are utilizing CEMS for compliance purposes for NO_X, SO_2 and opacity.

Emissions unit number 8 consists of two Fly Ash Storage Silos. Fly ash collection systems from precipitators on boilers numbers 4, 5, 6 & 7 to three transfer tanks are totally enclosed with no emission points. Three blowers pneumatically convey dry fly ash to 2 silos at a maximum solids rate of 150 tons per hour to either silo or to both. The majority of the solids (99.4%) settles by gravity upon entering the silo, the residual particulates are controlled by a baghouse on each silo. Each baghouse is a Pulse Jet Fabric Filter - model #100 - WMWC - 420 (IIG) manufactured by Flex-Kleen. Dry fly ash will be transported in closed tanker trucks away from the site

(approximately 20% sold annually) or conditioned (12-15% water added) fly ash will be transported to an approved landfill area on the site. This emissions unit is regulated under Rule 62-210.300, F.A.C., Permits Required and Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards. There is one baghouse on each silo. Historical test data presented by Gulf Power shows less than 2.2% opacity from these units for the past 5 years. Based on these results, the Department does not feel that additional periodic monitoring is necessary.

The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emissions limits and to aid in determining future rule applicability. A note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required to demonstrate at what percentage of the rated capacity that the emissions unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of process variables for emissions tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

One Energy Place
Pensacola, Florida 32520

850.444.6111

GULF POWER
A SOUTHERN COMPANY

September 2, 1999

HAND DELIVERED

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

Dear Mr. Sheplak:

RE: EPA Objection to Proposed Title V Permit
Plant Crist: 0330045-001-AV

Attached, please find Gulf Power's response to the Department's letter dated 7/28/99 (received July 30, 1999) regarding EPA's formal objection of the Crist Title V Permit No. 033045-001-AV. As outlined in the above referenced correspondence, Gulf Power would like to make a written reply to EPA within the 45 day window allowed for an applicant to include supportive materials in the record relevant to the issues raised by the objection.

As you may recall from our meeting on August 6, 1999, many of the issues identified by EPA address specific issues regarding format and errors that FDEP needs to directly address. Please incorporate your comments on these relative issues with ours and send a response to EPA before September 13, 1999. If possible, Gulf Power would like to review your final draft before it is routed to EPA.

Additionally, Gulf Power believes a face to face meeting with EPA maybe needed to address any unresolved issues. Therefore, Gulf Power requests FDEP schedule a meeting with EPA Region IV as soon as possible to address our responses and to continue any discussions regarding the de-coupling of the Title IV and V programs in Florida should it still be needed.

If you have any questions or need further information, please call me (850) 444-6527.

Sincerely,

G. Dwain Waters Q.E.P.

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

cc/watt: Danny Herrin, Southern Company Services
Robert G. Moore, Gulf Power Company
James O Vick, Gulf Power Company
Joe Martin, Gulf Power Company
John Dominey, Gulf Power Company
Kim Flowers Gulf Power Company
Ken Peacock, Gulf Power Company
Tracy Reeder, Gulf Power Company
Angela Morrison, Hopping, Green, Sams & Smith

Gulf Power's Response to EPA's Region IV Letter of Objection dated July 22, 1999 regarding the Crist Title V Permit

(Permit No. 0335045-001-AV)
9/2/99

Background: On July 30, 1999, Gulf Power received notification from FDEP that EPA issued a formal objection to the Crist Title V permit. In accordance with Florida law, the FDEP can not issue a final Title V Crist permit until the objection is resolved or withdrawn. Gulf Power may file a written reply to the objection within 45 days from the day FDEP serves notice to the applicant (i.e. September 13). Within 90 days (i.e. October 27), FDEP will have to resolve the objection by issuing a permit that satisfies EPA or EPA will assume authority for the permit. At this point, FDEP's role is one of a mediator between Gulf Power and EPA. All correspondence with EPA must flow through FDEP. Outlined below are Gulf Power comments regarding the issues raised by EPA which directly effect operations at Plant Crist. FDEP has agreed to provide additional comments other general process issues identified by EPA's letter of objection. Gulf Power's comments with those by FDEP will be forwarded by FDEP to EPA Region IV before September 13, 1999.

U.S. EPA Region 4 Objection

Proposed Part 70 Operating Permit
Gulf Power Company
Crist Electric Generating Plant
Permit no. 033045-001-AV

1. EPA Objection Issues

1. Periodic Monitoring: The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter limit for units 1-3. Condition A.15 of the permit only requires an annual test, which, according to conditions A.21, A.27, A.28, and A.29, may not even be required since this unit's primary fuel is natural gas (see Objection Issue 2). In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the particulate matter. The permit must require the source to conduct more frequent monitoring or a technical demonstration must be included in the statement of basis explaining why the State has chosen not to require any additional PM testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a test performed once a year.

Response: EPA accepted identical periodic monitoring permit language for Title V permits negotiated with FP&L. Florida has an approved alternative sampling procedure (ASP Number 97-B-01) dated July 2, 1997 which authorizes owners of natural gas fossil fuel steam generators to forgo particulate matter compliance testing on an annual basis and prior to renewal of an operation permit. Additionally, the order states that the Department (FDEP) shall not require submission of particulate matter emission compliance test results for any fossil fuel steam generator emissions unit that burned liquid and/or solid fuel for a total of no more than 400 hours during the year prior to renewal. The units identified in the issue are Crist Units 1-2-3. These units have not burned liquid fuel for more than 400 hours for generation per year in the past 10 years. Opacity and sulfur dioxide monitors were operated voluntarily on each unit (Crist 1-2-3) from approximately 1975 to 1994. During this time there were no excess emissions reported for any quarter above those allowed under Chapter 62-210.700 F.A.C. For this reason and due to the exemption of opacity monitoring allowed under the Clean Air Act Amendments of 1990 for gas units, Gulf Power upon agreement from FDEP removed the opacity and sulfur dioxide monitors from service on Crist Units 1-2-3 in 1994. Gulf Power believes the above information is sufficient as a technical demonstration for periodic monitoring to ensure compliance with the applicable particulate matter limit for Crist Units 1-2-3. (See Attachment A for ASP Number 97-B-01)

2. Compliance Testing: The permit is not clear about the frequency of testing that the facility needs to follow for particulate matter (PM) and visible emissions (VE). Condition A.15 states that the source must conduct annual testing for PM and VE. However, conditions A.21, A.27, A.28, and A.29 establish that the facility will conduct testing once a year if fuel oil is burned for more than 400 hours, and no testing is required otherwise. The permit needs to be clear about which one of these conditions the facility must follow to demonstrate compliance with the PM and VE limits. The same comment applies to conditions B.17 and B.26, and C.17 and C.26. Additionally, the permit needs to include the regulatory basis for conditions A.15, B.17 and C.17.

   Furthermore, EPA is concerned with the interaction of these conditions. The statement of basis indicates that the source will conduct annual testing for particulate matter for units 4-7. Therefore, we do not understand why the testing waivers are included for these units since they seem not to apply.

Response: Gulf Power somewhat agrees with EPA's item #2 objection in that the permit language is difficult to determine exactly what is required of the applicant. Gulf Power believes this issue can be corrected through better permit language or by the use of permit notes to direct the reader to the bottom line testing requirement of the permit (See item #1 above for Crist 1-2-3). It should be noted that this issue should not apply to Crist 4 & 5(EPA's reference to Condition B 17) and Crist 6 & 7 (Reference to Condition C.17) because they are coal fired generating units and conduct annual tests. Conditions B.17 and C.17 could be corrected by deleting any reference to "SO2" testing since CEMS are being used for compliance. Gulf Power suggests the following language for Condition A.15. Similar language is suggested for Conditions B.17 (Units 4 & 5) and C.17 (Units 6 & 7):

A. 15 Annual Tests Required. Units 001, 002, and 003 must conduct annual testing for particulate matter and visible emissions, except as provided under Condition A.21, A.27, and A.29 ~~in accordance with the requirements~~ listed below.

3. Appropriate Averaging Times: In order for the emissions standard for particulate matter contained in conditions A.7, B.7, and C.7 to be practicably enforceable, the appropriate averaging time must be specified in the permit. An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance.

Response: Conditions A.7, B.7 and C.7 make reference to averaging time by measurement by the applicable compliance method. Gulf Power believes the averaging times have been specified in the permit for opacity by the use of CEMs for compliance using a block 6 minute average under Condition B19 (Permit Note) and C19 (Permit Note). Additionally, compliance to sulfur dioxide standards are outlined by CEMs using a 24 hour average under Condition B23 and C23. Particulate Matter compliance is outlined under Condition B21 and C21 as the minimum time for a sample collection of a volume of 30 dry standard cubic feet.

4. Periodic Monitoring: Conditions B.17 and C.17 of the permit require the source to conduct annual testing for particulate matter. The statement of basis for the permit states that this testing frequency "is justified by the low emission rate documented in previous emissions tests while firing coal" and that the "Department has determined that sources with emissions less than half of the effective standard shall test annually."

   While EPA has in the past accepted this approach as adequate periodic monitoring for particulate matter, it has done so only for uncontrolled natural gas and fuel oil fired units. The units addressed in conditions B.17 and C.17 use add-on control equipment to comply with the applicable particulate matter standard. In order to provide reasonable assurance

of compliance, the results of an annual stack testing will have to be supplemented with additional monitoring. Furthermore, the results of an annual test alone would not constitute an adequate basis for the annual certification of compliance that the facility will have to submit for these units.

The most common approach to addressing periodic monitoring for particulate emission limits on units with add-on controls is to establish either an opacity or a control device parameter indicator range that would provide evidence of proper control device operation. The primary goal of such monitoring is to provide reasonable assurance of compliance, and one way of achieving this goal is to use opacity data or control device operating parameter data from previous successful compliance tests to identify a range of values that has corresponded to compliance in the past. Operating within the range of values identified in this manner would provide assurance that the control device is operating properly and would serve as the basis for an annual compliance certification. Depending upon the margin of compliance during the tests used to establish the opacity or control device indicator range, going outside the range could represent either a period of time when an exceedance of the applicable standard is likely or it could represent a trigger for initiating corrective action to prevent an exceedance of the standard. In order to avoid any confusion regarding the consequences of going outside the indicator range, the permit must clearly state if doing so is evidence that a standard has been exceeded and must specify whether corrective action must be taken when a source operates outside the established indicator range.

Response: Gulf Power disagrees with the above approach to address periodic monitoring for particulate emission limits. Gulf Power is concerned that the EPA suggested procedure is an attempt to implement Compliance Assurance Monitoring (CAM) before its legal requirement. Nevertheless, Gulf Power is willing to suggest alternative language to better address periodic monitoring for particulate matter for Plant Crist. Gulf Power proposes the following language for Plant Crist:

Periodic Monitoring for particulate matter is an annual particulate compliance test (PCT) for units with add on emission control systems that demonstrate a history (5 year average) of compliance of 40% or less of the applicable Florida particulate standard. Units not meeting this evaluation upon initial Title V permit issuance shall conduct a PCT semi-annually. Additionally, each base load electric generating unit having a continuous opacity monitor (COM) will meet on a quarterly basis EPA's Continuous Emission Monitoring Enforcement Plan (CEP) for the applicable opacity standard at 5% or less of Time on Line. Peaking units shall be evaluated similarly with the exception that start up and shut down operations shall be excluded. Should a unit exceed the 5% time on line evaluation in any quarter, a particulate compliance test (PCT) shall be conducted within the following operating quarter as defined by EPA under the Acid Rain Part 75 rules. (See Attachment B for the Plant Crist unit by unit evaluation.)

5. Periodic Monitoring: Condition C.7 specifies that particulate matter emissions from unit 6 shall not exceed 1,475 tons per year. Based upon the short term limit for this unit [0.1 pound/million British thermal units (BTUs)], heat input capacity (3,704.8 BTU/hour), and 8,760 hours of operation per year, unit 6 could emit 1,622.7 ton/year of particulate matter even if it is continuously meeting the applicable short-term particulate limit. Since this value exceeds the annual emission limit of 1,475 ton/year, the permit must be revised to include conditions specifying the procedures that Gulf Power will use to demonstrate compliance with the annual particulate emission limit for unit 6.

Response: Condition C7 was included in the Title V permit because it was include in an old Crist Unit 6 ESP Construction Permit for informational purposes only. FDEP granted Gulf Power an option of removing the condition upon publication of a public notice of change of the Crist Unit 6 Construction Permit. For the sake of timeliness and need for expediency to acquire a final Title V

permit, Gulf Power has elected to forgo further delay to the process by accepting the annual condition. Gulf Power, however does seek the right to delete this condition in the future upon a more positive timely response scenario. Gulf Power proposes that compliance to the condition shall be determined by submission of an annual certification by the responsible official based on data calculated and submitted in the required Annual Operating Report (AOR).

6. Periodic Monitoring: Condition C.9 specifies that, when burning solid fuel, sulfur dioxide emissions from unit 6 shall not exceed 87,035 tons per year. Although Condition C.16 indicates that monitoring to assure compliance with this limit will be conducted with the SO_2 continuous emission monitor installed on unit 6, data from the flue gas flow rate monitor installed on this unit is needed in order to convert the data from the SO_2 monitor into an hourly mass emission rate that can be totaled in order to verify compliance with the annual SO_2 emission limit. Therefore, Condition C.16 must be revised to require that both the SO_2 and flue gas flow rate monitors be used to determine SO_2 emission rates on unit 6.

Response: Condition C7 was included in the Title V permit because it was include in an old Crist Unit 6 ESP Construction Permit for informational purposes only. FDEP granted Gulf Power an option of removing the condition upon publication of a public notice of change of the Crist Unit 6 Construction Permit. For the sake of timeliness and need for expediency to acquire a final Title V permit, Gulf Power has elected to forgo further delay to the process by accepting the annual condition. Gulf Power, however does seek the right to delete this condition in the future upon a more positive timely response scenario. Gulf Power proposes that compliance to the condition shall be determined by submission of an annual certification by the responsible official based on data calculated and submitted in the required Annual Operating Report (AOR). Gulf Power does not agree with EPA that compliance must be determined by the use of flue gas flow monitors.

7. Periodic Monitoring: Conditions D.7 and D.8 of the permit require that an annual Method 9 test be conducted for these units. In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the visible emissions standard. The permit must require the source to conduct visible emissions observations on a daily basis (Method 22), and that a Method 9 test be conducted within 24 hours of any abnormal qualitative survey. As an alternative to this approach, a technical demonstration can be included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a short-term test performed once a year.

Response: Gulf Power does not agree that daily Method 22 visible emissions tests are needed to constitute adequate periodic monitoring for equipment (Fly Ash Silo) referenced in Condition D.7 and D.8. A technical demonstration using annual opacity test results is available to demonstrate that the source is < 50% of the standard. A historical evaluation (five year average) of annual opacity compliance tests for the Crist Fly Ash Silo reveal compliance at an average of less than 1% opacity. Gulf Power believes this is an adequate technical demonstration for periodic monitoring for visible emissions for the Crist Fly Ash Silo. (See Attachment B)

8. Acid Rain: Please note that the Phase II Averaging Plan submitted by the source is an enforceable part of this permit. The Averaging Plan, Phase II NO_x Compliance and Phase II Acid Rain Permit Application should be referenced and attached as enforceable parts of the Title V permit. We note that Phase II permit applications, Phase II NO_x Compliance Plans and the Phase II Averaging Plans submitted by this source are referenced in Section IV, Condition A.1.of the proposed permit and on page 1 of the permit in a section entitled, "Referenced attachments made part of this permit".

However, the forms and the referenced dates of these two parts of the permit do not coincide and do not appear to reflect the complete signed forms as submitted by the source. It is important that the specific forms and applications (signed and dated by the designated representative) be attached to the permit as enforceable parts of the permit and that they are completely and accurately referenced.

Response: FDEP to correct permit language to better reflect this requirement.

9. Acid Rain: The language contained in section 70.6(a)(1)(ii), regarding Acid Rain Program requirements in title V is not addressed in the Acid Rain Part of the permit and does not appear to be included in elsewhere in the body of the proposed permit. This condition needs to be added to the proposed title V permit for this source.

Response: FDEP to correct permit language to better reflect this requirement.

II. General Comments

1. Section II, condition 1: Please make sure that Appendix TV-2 reflects the updated version of condition 51, as it is contained in Appendix TV-3.

Response: FDEP to correct permit language to better reflect this requirement.

2. Section II. condition 12: Please correct the address, telephone and fax number for the Air Enforcement Section. All required reports should be sent to the Air Enforcement Section (AES), not the Operating Source Section. The correct telephone and fax numbers for AES are 404/562-9055 and 404/562-9163, respectively. Additionally, please delete the information concerning the submission of Acid Rain information. Region 4 does not have an Acid Rain Section.

Response: FDEP to correct permit language to better reflect this requirement.

3. Statement of Basis: The statement of basis indicates that each emission unit is subject to a particulate matter emissions limit of 0.1 lb/MMBtu, and this limit is effectively equivalent to 0.149 lb/MMBtu due to rounding. This is also stated for conditions of soot blowing, where the particulate matter emission limit of 0.3 lb/MMBtu would be equivalent to 0.349 lb/MMBtu. However, these statements are incorrect. A measured emission rate of 0.149 lb/MMBtu actually rounds to 0.15 lb/MMBtu rather than 0.1 lb/MMBtu, which is in excess of the emission limit, and therefore not allowable.

   According to the June 6, 1990 memorandum "Performance Test Calculation Guidelines", issued by William G. Laxton, Director of the Technical Support Division, OAQPS, and John S. Seitz, Director of the Stationary Source Compliance Division, OAQPS, when calculating and reporting emission rates and concentrations in determining compliance with the new source performance standards (NSPS) and national emission standards for hazardous pollutants (NESHAP), as well as state implementation plans (SIP's), all emission standards should be considered to have at least two significant figures (SF's), but no more than three. Therefore, since the 0.1 lb/MMBtu emission limit for particulate matter comes from the Florida state SIP, it should be considered to have two SF's. In this case, the emission limit effectively becomes 0.10 lb/MMBtu. In order to comply with the emission limit of 0.1 lb/MMBtu, the highest allowable measured emission rate (measured to four SF's) is 0.1049 lb/MMBtu. Please correct the statement of basis to reflect the above discussion.

Response: Gulf Power does not agree with the EPA objection regarding Florida's particulate emissions standard. Gulf Power recommends that FDEP remove direct reference to the numerical standard in the standard of basis. FDEP should reference the FP&L agreement regarding this issue in finalizing a response.

4. Section IV, Acid Rain Part: Please note that the allowances allocated to the Crist Plant units 4,5,6,7, as indicated under Section IV, Condition A.2 of the proposed permit have been changed. This revision was published in the Federal Register on September 28, 1998 (Vol. 63 No. 187, pp 51706-51765). We recommend that the allowances that are indicated for these units be adjusted to reflect the revised allocation.

Response: FDEP to correct permit language to better reflect this requirement.

5. Appendix CP-1: Appendix CP-1, "Alternate Phase II NO_x Compliance Plan" of the proposed permit for the Gulf Power Company - Crist Plant requires that the designated representative of the Crist Plant provide certification that the NO_x averaging plan has been approved by all the other involved permitting authorities prior to Florida's approval of the plan. The procedure, as indicated in the "Appendix CP-1" of this proposed permit, does not appear to consider future revisions to a previously approved Phase II NO_x Averaging Plan. Each year of a plan, the permittee has the option of submitting a revision to an approved averaging plan by January 1 of the calendar year for which the averaging plan is to become effective. Condition 2 of "Appendix CP-1" specifically addresses the approval of the current Phase II Averaging Plan and does not discuss Florida's approval procedures for revisions to an Phase II NO_x Averaging Plan. Condition 3 of "Appendix CP-1" indicates that should the designated representative fail to submit the required certification under this Appendix then the source would be required to comply to the applicable Phase II NO_x emission limits specified in 40 CFR § 76.5. Please note that 40 CFR § 76.11(b)(3) indicates that when an averaging plan or a revision to an approved averaging plan is not approved, the owner or operator of each unit in the plan shall operate the unit in compliance with the emission limitation that would apply in the absence of an averaging plan or revision to a plan. Therefore, in the case where the permittee has an approved averaging plan but wishes to revise the plan, the approval of the revision is not final until all permitting authorities have approved the revision. Should the revision not be approved, then the permittee is required to comply with the originally approved (assuming it has been approved for multiple years) plan in absence of the revision. Appendix CP-1 should be revised to specify that the conditions contained in the appendix only apply to the particular averaging plan attached to this permit and does not prescribe procedures that should be followed for future revisions to the plan.

   Region 4's concern regarding the Rule 62-214.330(3)(b) requiring the designated representatives of a source in a multi-agency Phase II Averaging Plan to certify that every other affected permitting authority has approved the plan prior to the State of Florida's approval was indicated in a letter sent to Mr. Howard Rhodes from Mr. Douglas Neeley on December 9, 1997. It was Region 4's understanding, at that time, that Florida's Rule 62-214.330 was scheduled to be revised to avoid conflicts (such as has been described above) with 40 CFR Part 76. Appendix CP-1 was prepared so that the approval process would not be delayed in the interim. Please provide Region 4 with a schedule indicating when the revision is to occur.

Response: FDEP to address this issue.

ATTACHMENT B

Opacity Excess Emissions Summary for Crist (1992-1998)

Year		94				95				96				97				98				5 Year Avg
Quarter		1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	
Crist 4.	% Excess emissions	0.2	0.1	0.3	0.2	0.6	0.1	0.0	0.6	0.1	0.3	0.3	0.3	0.0	0.1	0.2	0.3	0.1	0.0	0.1	0.1	0.2
	% CMS Downtime	0.0	0.5	0.0	0.0	1.0	0.1	0.1	0.1	0.5	0.1	0.3	0.1	0.1	0.1	0.1	0.2	0.4	0.6	0.1	0.5	0.2
	Total Percent	0.2	0.6	0.3	0.2	1.6	0.2	0.1	0.7	0.6	0.4	0.6	0.4	0.1	0.2	0.3	0.5	0.5	0.6	0.2	0.6	0.4
Crist 5	% Excess emissions	0.2	0.3	0.2	0.2	2.0	1.0	1.0	0.8	0.1	0.1	0.4	0.3	0.1	0.4	0.2	0.8	0.1	0.2	0.4	0.0	0.4
	% CMS Downtime	0.0	0.0	0.0	0.0	1.0	0.1	0.2	0.1	0.0	0.1	0.1	0.0	0.1	0.0	0.2	0.1	0.1	0.1	0.1	0.2	0.1
	Total Percent	0.2	0.3	0.2	0.2	3.0	1.1	1.2	0.9	0.1	0.2	0.5	0.3	0.2	0.4	0.4	0.9	0.2	0.3	0.5	0.2	0.6
Crist 6	% Excess emissions	0.9	1.2	0.2	0.2	0.1	0.1	0.2	0.1	0.0	0.1	0.0	0.1	0.1	0.1	0.2	0.1	0.1	0.1	0.0	0.1	0.2
	% CMS Downtime	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.1	0.0	0.0	0.0	0.1	0.0	0.4	0.0	0.1	0.1	0.0	0.1
	Total Percent	0.9	1.2	0.2	0.2	0.1	0.1	0.2	0.3	0.0	0.2	0.0	0.1	0.1	0.2	0.2	0.5	0.1	0.2	0.1	0.1	0.3
Crist 7	% Excess emissions	0.4	0.4	0.2	0.5	0.4	0.5	0.3	0.3	0.4	0.2	0.3	0.3	1.0	2.1	0.3	0.5	2.2	0.2	0.8	0.2	0.6
	% CMS Downtime	0.0	0.2	0.5	0.3	0.0	0.1	0.0	0.1	0.1	0.7	0.4	0.0	0.0	0.4	0.0	0.1	0.1	0.0	0.0	0.1	0.2
	Total Percent	0.4	0.6	0.7	0.8	0.4	0.6	0.3	0.4	0.5	0.9	0.7	0.3	1.0	2.5	0.3	0.6	2.3	0.2	0.8	0.3	0.7

Gulf Power Steady State Particulate Emission Tests Summary (1992-1998)

Unit	1994	1995	1996	1997	1998	5 Year Avg
Limit	0.1	0.1	0.1	0.1	0.1	0.1
Crist 4	0.015	0.012	0.012	0.010	0.008	0.011
Crist 5	0.061	0.069	0.029	0.027	0.011	0.039
Crist 6	0.006	0.003	0.003	0.010	0.012	0.007
Crist 7	0.037	0.016	0.037	0.041	0.072	0.041
Smith 1	0.017	0.021	0.017	0.019	0.029	0.021
Smith 2	0.021	0.015	0.028	0.025	0.049	0.028
Scholz 1	0.018	0.023	0.035	0.024	0.016	0.023
Scholz 2	0.020	0.013	0.016	0.013	0.010	0.014

PLANT CRIST FLYASH SILO
OPACITY EVALUATION

	OPACITY	
YEAR	"A" SILO	"B" SILO
1998	0%	0%
1997	0%	0%
1996	0%	0%
1995	0.8%	0.2%
1994	2.2%	2.1%
AVERAGE	0.6%	0.46%

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

September 15, 1999

Mr. R. Douglas Neeley, Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics Management Division
United States Environmental Protection Agency
Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8909

Re: Proposed Changes to the Proposed Title V Permit for the Gulf Power -- Crist Plant, to Address EPA Objections

Dear Mr. Neeley:

This letter is to document changes that Gulf Power Company and the Department propose to satisfy EPA Region 4 objections to Florida's Proposed Title V permit for the Gulf Power – Crist Plant. These objections were detailed in a letter from EPA Region 4 dated July 22, 1999. Enclosed, please find a hard copy of the response from Gulf Power that was faxed to you on Tuesday, September 7, the Department's responses to your comments that Gulf Power identified as needing Department clarification, and a new Statement of Basis.

Based on the outcome of our teleconference on Friday, September 10, with David McNiel and Elizabeth Bartlett, of your staff, we believe that the following responses will satisfy your concerns. Resolution of this objection is crucial in order for Gulf Power to receive a Final Title V permit, including the Southern Company's multi-state NO_X averaging plan, by December 31, 1999. Upon your concurrence with the responses listed below, the Department will issue a Final Title V permit that contains the changes as indicated.

Should you have any questions regarding this submission, please contact Mr. Jonathan Holtom, P.E., at (850) 921-9531.

Sincerely,

C.H. Fancy, P.E.
Chief
Bureau of Air Regulation

Enclosures.

cc: Mr. James Vick, Gulf Power Company
Mr. G. Dwain Waters, Gulf Power Company (E-mail)
Ms. Elizabeth Bartlett, USEPA Region 4 (E-mail)

CHF/jh

Gulf Power Company – Crist Electric Generating Plant

Department Responses to EPA Objections
Initial Title V Permit

The following responses address the EPA comments that Gulf Power has indicated as needing Department clarification.

EPA Comment Number 2.

Compliance Testing: The permit is not clear about the frequency of testing that the facility needs to follow for particulate matter (PM) and visible emissions (VE). Condition A.15 states that the source must conduct annual testing for PM and VE. However, conditions A.21, A.27, A.28, and A.29 establish that the facility will conduct testing once a year if fuel oil is burned for more than 400 hours, and no testing is required otherwise. The permit needs to be clear about which one of these conditions the facility must follow to demonstrate compliance with the PM and VE limits. The same comment applies to conditions B.17 and B.26, and C.17 and C.26. Additionally, the permit needs to include the regulatory basis for conditions A.15, B.17 and C.17.

Furthermore, EPA is concerned with the interaction of these conditions. The statement of basis indicates that the source will conduct annual testing for particulate matter for units 4-7. Therefore, we do not understand why the testing waivers are included for these units since they seem not to apply.

In response to this comment, condition A.15. is changed:

From:
A.15. Annual Tests Required. Units -001, -002 and -003 must conduct annual testing for particulate matter and visible emissions in accordance with the requirements listed below.

To:
A.15. Annual Tests Required. Except as provided in Specific Conditions **A.27. – 29.**, units -001, -002 and -003 shall conduct annual testing for particulate matter and visible emissions in accordance with the requirements listed below.
[Rule 62-297.310(7)(a)4., F.A.C.]

In addition, the following rule citation will be added to conditions B.17. and C.17.: [Rule 62-297.310(7)(a)4., F.A.C.]. Furthermore, the Department does not agree with Gulf Power's opinion that the requirement to perform an SO_2 test should be deleted from conditions B.17. and C.17. The annual test is required by Rule 62-297.310(7), F.A.C. However, we have agreed to accept the test done during the annual RATA as satisfaction of this requirement, provided all other testing requirements specified in the permit are met.

EPA Comment Number 3.

Appropriate Averaging Times: In order for the emissions standard for particulate matter contained in conditions A.7, B.7, and C.7 to be practicably enforceable, the appropriate averaging time must be specified in the permit. An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance.

As a result of this comment, the following permitting note has been added following specific conditions A.7., B.7. & C.7.:
{Permitting Note: The averaging time shall correspond to the cumulative sample time, as specified in the reference test method (see specific condition **A.18., B.21., C.21. (as appropriate)**).}

EPA Comment Number 4.

Periodic Monitoring: Conditions B.17 and C.17 of the permit require the source to conduct annual testing for particulate matter. The statement of basis for the permit states that this testing frequency "is justified by the low emission rate documented in previous emissions tests while firing coal" and that the "Department has determined that sources with emissions less than half of the effective standard shall test annually."

While EPA has in the past accepted this approach as adequate periodic monitoring for particulate matter, it has done so only for uncontrolled natural gas and fuel oil fired units. The units addressed in conditions B.17 and C.17 use add-on control equipment to comply with the applicable particulate matter standard. In order to provide reasonable assurance of compliance, the results of an annual stack testing will have to be supplemented with additional monitoring. Furthermore, the results of an annual test alone would not constitute an adequate basis for the annual certification of compliance that the facility will have to submit for these units.

The most common approach to addressing periodic monitoring for particulate emission limits on units with add-on controls is to establish either an opacity or a control device parameter indicator range that would provide evidence of proper control device operation. The primary goal of such monitoring is to provide reasonable assurance of compliance, and one way of achieving this goal is to use opacity data or control device operating parameter data from previous successful compliance tests to identify a range of values that has corresponded to compliance in the past. Operating within the range of values identified in this manner would provide assurance that the control device is operating properly and would serve as the basis for an annual compliance certification. Depending upon the margin of compliance during the tests used to establish the opacity or control device indicator range, going outside the range could represent either a period of time when an exceedance of the applicable standard is likely or it could represent a trigger for initiating corrective action to prevent an exceedance of the standard. In order to avoid any confusion regarding the consequences of going outside the indicator range, the permit must clearly state if doing so is evidence that a standard has been exceeded and must specify whether corrective action must be taken when a source operates outside the established indicator range.

The Department does not agree with Gulf Power's response. Instead, we propose that the following two new conditions be added to the permit:

B.38. Periodic Monitoring Requirements. Periodic monitoring for particulate matter shall be COMs. For any calendar quarter in which more than five percent of the COMs readings show 20% or greater opacity (excluding start-up, shut-down and periods of COMs outages), a steady state particulate matter stack test shall be performed and submitted within the following calendar quarter. The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions and, where possible, shall be performed while operating at conditions representative to those showing greater than 20% opacity. Units are not required to be brought on-line solely for the purpose of performing this special compliance test. If the unit does not operate in the following quarter, the special compliance test may be postponed until the unit is brought back on-line. Once back on-line, the special test shall be performed within 20 days.
[Rule 62-213.440(4), F.A.C.]

C.39. Periodic Monitoring Requirements. Periodic monitoring for particulate matter shall be COMs. For any calendar quarter in which more than five percent of the COMs readings show 20% or greater opacity for unit 6 and 30% or greater opacity for unit 7 (excluding start-up, shut-down and periods of COMs outages), a steady state particulate matter stack test shall be performed and submitted within the following calendar quarter. The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions and, where possible, shall be performed while operating at conditions representative to those showing greater than 20% opacity (30% for unit 7). Units are not required to be brought on-line solely for the purpose of performing this special compliance test. If the unit does not operate in the following quarter, the special compliance test may be postponed until the unit is brought back on-line. Once back on-line, the special test shall be performed within 20 days.
[Rule 62-213.440(4), F.A.C.]

For units 4, 5 and 6, 20% opacity is an acceptable trigger for the need to perform a special compliance test. However, using 30% opacity as the benchmark for additional testing at unit 7 is justified based on a linear extrapolation of historical particulate test vs. opacity data that indicates compliance with the particulate limit at 30% opacity. It has been requested by Gulf Power due to the inherent tendencies of this unit to routinely operate at levels above 20% opacity.

EPA Comment Number 8.

Acid Rain: Please note that the Phase II Averaging Plan submitted by the source is an enforceable part of this permit. The Averaging Plan, Phase II NO_x Compliance and Phase II Acid Rain Permit Application should be referenced and attached as enforceable parts of the Title V permit. We note that Phase II permit applications, Phase II NO_x Compliance Plans and the Phase II Averaging Plans submitted by this source are referenced in Section IV, Condition A.1.of the proposed permit and on page 1 of the permit in a section entitled, "Referenced

attachments made part of this permit". However, the forms and the referenced dates of these two parts of the permit do not coincide and do not appear to reflect the complete signed forms as submitted by the source. It is important that the specific forms and applications (signed and dated by the designated representative) be attached to the permit as enforceable parts of the permit and that they are completely and accurately referenced.

In response to this comment, the referenced attachment dates have been updated to reflect the correct submission dates. The Acid Rain forms that will be included in the Title V permit are as follows:

Phase II Acid Rain Permit Application/Compliance Plan Received December 18, 1995
Phase II Acid Rain NO_X Compliance Plan Received December 22, 1997
Revised Phase II Acid Rain NO_X Averaging Plan Received August 24, 1999

EPA Comment Number 9.

Acid Rain: The language contained in section 70.6(a)(1)(ii), regarding Acid Rain Program requirements in title V is not addressed in the Acid Rain Part of the permit and does not appear to be included in elsewhere in the body of the proposed permit. This condition needs to be added to the proposed title V permit for this source.

As a result of this comment, two new conditions have been added to the Acid Rain section. Th e remainder of the existing conditions have been renumbered accordingly.

A.5. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400, F.A.C.
[40 CFR 70.6(a)(4)(i); and, Rule 62-213.440(1)(c)1., F.A.C.]

A.6. Where an applicable requirement of the Act is more stringent than applicable regulations promulgated under Title IV of the Act, both provisions shall be incorporated into the permit and shall be enforceable by the Administrator.
[40 CFR 70.6(a)(1)(ii); and, Rule 62-210.200, F.A.C., Definitions – Applicable Requirements.]

EPA General Comment Number 1.

Section II, condition 1: Please make sure that Appendix TV-2 reflects the updated version of condition 51, as it is contained in Appendix TV-3.

As a result of this comment, Appendix TV-2 has been replaced with Appendix TV-3 and all references have been updated.

EPA General Comment Number 2.

Section II, condition 12: Please correct the address, telephone and fax number for the Air Enforcement Section. All required reports should be sent to the Air Enforcement Section (AES), not the Operating Source Section. The correct telephone and fax numbers for AES are 404/562-9055 and 404/562-9163, respectively. Additionally, please delete the information concerning the submission of Acid Rain information. Region 4 does not have an Acid Rain Section.

As a result of this comment, the requested changes have been made.

EPA General Comment Number 3.

See new Statement of Basis, attached.

EPA General Comment Number 4.

Section IV, Acid Rain Part: Please note that the allowances allocated to the Crist Plant units 4,5,6,7, as indicated under Section IV, Condition A.2 of the proposed permit have been changed. This revision was published in the Federal Register on September 28, 1998 (Vol. 63 No. 187, pp 51706-51765). We recommend that the allowances that are indicated for these units be adjusted to reflect the revised allocation.

As a result of this comment, the Acid Rain section has been updated to reflect the revised allowances as follows:

Unit Number	Phase II Allowances
1	35
2	3
3	4
4	2467
5	2430
6	8396
7	12522

EPA General Comment Number 5.

Appendix CP-1, Alternate Phase II NO_X Compliance Plan, was only intended to address the initial issuance of the Title V/Acid Rain permit. It does not address any future revisions to the averaging plan. Future revisions will be subject to a different compliance plan.

STATEMENT OF BASIS

Gulf Power Company
Crist Electric Generating Plant
Facility ID No.: 0330045
Escambia County

Initial Title V Air Operation Permit
PROPOSED Permit No.: 0330045-001-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named 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 permitting authority, in accordance with the terms and conditions of this permit.

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. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

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. The Department feels that additional periodic monitoring for particulate matter emissions is not needed for these units. For each of the past ten years, these units have burned fuel oil for less than 400 hours. Under the approval granted by an alternate sampling procedure (ASP 97-B-01) accepted by EPA, as long as these units do not burn liquid or solid fuel for greater than 400 hours per year, annual particulate matter tests are not required.

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. Particulate matter emissions from unit -006 are controlled by a cold side electrostatic precipitator (Wheelabrator Model # HaRDE). Particulate matter 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.

Periodic monitoring for particulate matter will be through the use of COMs. For any calendar quarter in which more than five percent of the COMs readings on units 4, 5 and 6 show 20% or greater opacity (30% for unit 7), a steady-state particulate matter stack test will be required to be performed and submitted within the following calendar quarter. If the unit does not operate in the following quarter, it shall be tested within 20 days of coming back on-line. These units are subject to a steady-state PM emission limit of 0.1 lb/MMBtu, and 0.3 lb/MMBtu for soot blowing. They are also subject to an opacity standard of 40%. The applicant has presented historical PM test results which show that the steady-state and soot blowing average results are significantly less than the applicable standards. A five year average of results of particulate matter emission testing, in lb/MMBtu, for this facility is given below:

Unit #	Steady-state	Soot-blowing
4	0.011	0.016
5	0.039	0.035
6	0.007	0.010
7	0.041	0.062

The Department and EPA have previously determined that sources without controls, whose emissions are less than half of the applicable standard, shall test annually. Given the historically low documented PM emissions combined with the company's agreement to conduct a PM stack test following any quarter in which their COMs data shows that greater than 5% of the readings are greater 20% (30% for unit 7), the Department believes that periodic monitoring for particulate matter is more than reasonably addressed. Using 30% opacity as the benchmark for additional testing at unit 7 is justified based on a linear extrapolation of historical particulate test vs. opacity data that indicates compliance with the particulate limit at 30% opacity. It has been requested by Gulf Power due to the inherent tendencies of this unit to routinely operate at levels above 20% opacity.

Units 4, 5, 6 and 7 are utilizing CEMS for compliance purposes for NO_X, SO_2 and opacity.

Emissions unit number 8 consists of two Fly Ash Storage Silos. Fly ash collection systems from precipitators on boilers numbers 4, 5, 6 & 7 to three transfer tanks are totally enclosed with no emission points. Three blowers pneumatically convey dry fly ash to 2 silos at a maximum solids rate of 150 tons per hour to either silo or to both. The majority of the solids (99.4%) settles by gravity upon entering the silo, the residual particulates are controlled by a baghouse on each silo. Each baghouse is a Pulse Jet Fabric Filter - model #100 - WMWC - 420 (IIG) manufactured by Flex-Kleen. Dry fly ash will be transported in closed tanker trucks away from the site

(approximately 20% sold annually) or conditioned (12-15% water added) fly ash will be transported to an approved landfill area on the site. This emissions unit is regulated under Rule 62-210.300, F.A.C., Permits Required and Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards. There is one baghouse on each silo. Historical test data presented by Gulf Power shows less than 2.2% opacity from these units for the past 5 years. Based on these results, the Department does not feel that additional periodic monitoring is necessary.

The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emissions limits and to aid in determining future rule applicability. A note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required to demonstrate at what percentage of the rated capacity that the emissions unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of process variables for emissions tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

INTEROFFICE MEMORANDUM

Date: 09-Sep-1999 04:55pm
From: Waters, Glenn D.
GDWATERS@southernco.com
Dept:
Tel No:

To: Clair H. Fancy (E-mail) (fancy_c@dep.state.fl.us)
To: Jonathan Holtom (E-mail) (holtom_j@dep.state.fl.us)

Subject: CrOpacityvsPCt94-99.xls

Attached please find opacity vs particulate test data for Plant Crist from 1994-99. Please note that the extrapolation is near 40% opacity for an equivalent .10 lb/mbtu particulate rate. Please use this data as a technical justification to adopt a 30% opacity indicator for Periodic Monitoring for Plant Crist units 4-7.

I'm still pulling files for Scholz and Smith.

<<CrOpacityvsPCt94-99.xls>>

Crist 7 Periodic Monitoring Evaluation

		Sootblowing	Steady State	Sootblowing Ratio of Opacity to PCT	Steady State Ratio of Opacity to PCT	Opacity % Equivalent for Soot Blow PCT (.30)	Opacity % Equivalent for Steady State PCT (.10)
1994	Opacity	8.34	12.61	0.003477	0.002934	86.3	34.1
	PCT	0.029	0.037				
1995	Opacity	8.41	7.48	0.00321	0.002139	93.4	46.8
	PCT	0.027	0.016				
1996	Opacity	19.3	17.17	0.001813	0.002155	165.4	46.4
	PCT	0.035	0.037				
1997	Opacity	23.1	19.3	0.002294	0.002124	130.8	47.1
	PCT	0.053	0.041				
1998	Opacity	20.8	10.96	0.007981	0.006569	37.6	15.2
	PCT	0.166	0.072				
1999	Opacity	21.91	21.05	0.003925	0.003183	76.4	31.4
	PCT	0.086	0.067				
94-99 Avg						98.3	36.8

assuming linear correlation.

Final all Crist & Smith Revised Draft.

$$\frac{0.1\ \frac{lb}{MMBTU}}{36.8\%} = \frac{X}{40\%}$$

$X = 0.1087\ lb/MMBTU$

Crist 7 Periodic Monitoring Evaluation		Sootblowing	Steady State	Sootblowing Ratio of Opacity to PCT	Steady State Ratio of Opacity to PCT	Opacity % Equivalent for Soot Blow PCT (.30)	Opacity % Equivalent for Steady PCT (.10)
1994	Opacity	8.34	12.61	0.00348	0.00293	86.3	34.1
	PCT	0.029	0.037				
1995	Opacity	8.41	7.48	0.00321	0.00214	93.4	46.8
	PCT	0.027	0.016				
1996	Opacity	19.3	17.17	0.00181	0.00215	165.4	46.4
	PCT	0.035	0.037				
1997	Opacity	23.1	19.3	0.00229	0.00212	130.8	47.1
	PCT	0.053	0.041				
1998	Opacity	20.8	10.96	0.00798	0.00657	37.6	15.2
	PCT	0.166	0.072				
1999	Opacity	21.91	21.05	0.00393	0.00318	76.4	31.4
	PCT	0.086	0.067				
94-99 Avg						98.3	36.8

Crist 6 Periodic Monitoring Evaluation		Sootblowing	Steady State	Sootblowing Ratio of Opacity to PCT	Steady State Ratio of Opacity to PCT	Opacity % Equivalent for Soot Blow PCT (.30)	Opacity % Equivalent for Steady PCT (.10)
1994	Opacity	0.91	1.04	0.01099	0.00577	27.3	17.3
	PCT	0.01	0.006				
1995	Opacity	1.36	1.24	0.00588	0.00242	51.0	41.3
	PCT	0.008	0.003				
1996	Opacity	1.78	1.73	0.00281	0.00173	106.8	57.7
	PCT	0.005	0.003				
1997	Opacity	2.49	3.23	0.00361	0.00310	83.0	32.3
	PCT	0.009	0.01				
1998	Opacity	2.39	2.4	0.00837	0.005	35.9	20.0
	PCT	0.02	0.012				
1999	Opacity	4.37	4.8	0.00343	0.00188	87.4	53.3
	PCT	0.015	0.009				
94-99 Avg						65.2	37.0

Crist 5 Periodic Monitoring Evaluation		Sootblowing	Steady State	Sootblowing Ratio of Opacity to PCT	Steady State Ratio of Opacity to PCT	Opacity % Equivalent for Soot Blow PCT (.30)	Opacity % Equivalent for Steady PCT (.10)
1994	Opacity	11.69	10.1	0.00547	0.00604	54.8	16.6
	PCT	0.064	0.061				
1995	Opacity	11.42	18.72	0.00342	0.00369	87.8	27.1
	PCT	0.039	0.069				
1996	Opacity	5.46	10.58	0.00275	0.00274	109.2	36.5
	PCT	0.015	0.029				
1997	Opacity	1.59	1.47	0.02138	0.01837	14.0	5.4
	PCT	0.034	0.027				
1998	Opacity	8.26	5.45	0.00254	0.00202	118.0	49.5
	PCT	0.021	0.011				
1999	Opacity	8	8.4	0.00413	0.00179	72.7	56.0
	PCT	0.033	0.015				
94-99 Avg						76.1	31.9

Crist 4 Periodic Monitoring Evaluation		Sootblowing	Steady State	Sootblowing Ratio of Opacity to PCT	Steady State Ratio of Opacity to PCT	Opacity % Equivalent for Soot Blow PCT (.30)	Opacity % Equivalent for Steady PCT (.10)
1994	Opacity	5.13	5.71	0.00292	0.00263	102.6	38.1
	PCT	0.015	0.015				
1995	Opacity	3.75	3.37	0.0024	0.00356	125.0	28.1
	PCT	0.009	0.012				
1996	Opacity	14	8.61	0.00221	0.00139	135.5	71.8
	PCT	0.031	0.012				
1997	Opacity	2.25	2.43	0.00444	0.00412	67.5	24.3
	PCT	0.01	0.01				
1998	Opacity	3.43	2.93	0.00379	0.00273	79.2	36.6
	PCT	0.013	0.008				
1999	Opacity	4.21	4.08	0.00238	0.00221	126.3	45.3
	PCT	0.01	0.009				
94-99 Avg						106.0	40.7

Southern Fuel only-

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

FAX TRANSMITTAL SHEET

TO: Elizabeth Bartlett, USEPA Region 4

DATE: 09/07/99 PHONE: 850/921-9532

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 11

FROM:

SCOTT M. SHEPLAK, P.E.
ADMINISTRATOR
TITLE V SECTION

STATE OF FLORIDA
DEPT. OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR RESOURCES MANAGEMENT
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SHEPLAK_S@DEP.STATE.FL.US
WEB SITE:
http://www.dep.state.fl.us

COMMENTS:

Re: Gulf Power - Crist

Attached is Gulf Power's reply to the USEPA objection. The FDEP responses ("corrected permit language") will be forwarded ASAP. I recommend a teleconference or meeting.

PHONE: _____ FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call the above phone number.

INTEROFFICE MEMORANDUM

Jonathan FYI

Date: 02-Sep-1999 08:02pm
From: Waters, Glenn D.
GDWATERS@southernco.com
Dept:
Tel No:

To: Scott M. Sheplak (E-mail) 9/3 (sheplak_s@dep.state.fl.us)

Subject: Crist Title V Objection Response

Sorry it took so long to get a final proposal on Periodic Monitoring. Sometimes management is hard to pin down longer enough to get a buy in. I will be hand delivering Gulf Power's response to the Title V EPA Objection tomorrow about 2 pm. Gulf Power will be proposing an alternative plan to meet the periodic monitoring particulate matter for coal fired units with add on controls. Basically our proposal commits to meeting a 40% or less particulate standard on a 5 year average similar to FP& L 50% plan but with added assurance by evaluating quarterly excess emissions. If excess emissions are greater than 5% time on line then the unit would conduct a particulate test within the next operating quarter. Let's discuss this more before you route anything to EPA. See you tomorrow.

I recall that they're never greater than 5%

I'm unsure if I shared the final PRIME results from Bob McCann yesterday when you called but Smith Unit 1 came out at about 2.6 lbs/mbtu for SO2. Unit 2 at 2.9+. Both units at 4.6. The key receptor is still in Alligator Bayou, I think Bob said at 500 meters. Gulf's management still has a problem with these receptors in the Bayou, but at least these numbers are better. As soon as I get a final report from Bob I will email it to you, Cleave, Jonathan and Clair. More later.

COMS Data Not Method 9

Test Date	PM	PMSB	VE	Soot Blow
June 29& 30, 98	0.029	.024	4.0%	9%
June 29&30, 97	0.019	0.024	18%	12%
May 7 8 96	0.017	0.017		
Jul 95	0.027	0.024		
Jul 94	0.017	0.013		
Aug 93	0.015	0.022		
Jul 92	0.025	0.039		

One Energy Place
Pensacola, Florida 32520

850.444.6111

GULF POWER
A SOUTHERN COMPANY

September 2, 1999

HAND DELIVERED

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

Dear Mr. Sheplak:

RE: EPA Objection to Proposed Title V Permit
Plant Crist: 0330045-001-AV

Attached, please find Gulf Power's response to the Department's letter dated 7/28/99 (received July 30, 1999) regarding EPA's formal objection of the Crist Title V Permit No. 033045-001-AV. As outlined in the above referenced correspondence, Gulf Power would like to make a written reply to EPA within the 45 day window allowed for an applicant to include supportive materials in the record relevant to the issues raised by the objection.

As you may recall from our meeting on August 6, 1999, many of the issues identified by EPA address specific issues regarding format and errors that FDEP needs to directly address. Please incorporate your comments on these relative issues with ours and send a response to EPA before September 13, 1999. If possible, Gulf Power would like to review your final draft before it is routed to EPA.

Additionally, Gulf Power believes a face to face meeting with EPA maybe needed to address any unresolved issues. Therefore, Gulf Power requests FDEP schedule a meeting with EPA Region IV as soon as possible to address our responses and to continue any discussions regarding the de-coupling of the Title IV and V programs in Florida should it still be needed.

If you have any questions or need further information, please call me (850) 444-6527.

Sincerely,

G. Dwain Waters Q.E.P.

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

cc/watt: Danny Herrin, Southern Company Services
Robert G. Moore, Gulf Power Company
James O Vick, Gulf Power Company
Joe Martin, Gulf Power Company
John Dominey, Gulf Power Company
Kim Flowers Gulf Power Company
Ken Peacock, Gulf Power Company
Tracy Reeder, Gulf Power Company
Angela Morrison, Hopping, Green, Sams & Smith

Gulf Power's Response to EPA's Region IV Letter of Objection dated July 22, 1999 regarding the Crist Title V Permit

(Permit No. 0335045-001-AV)
9/2/99

Background: On July 30, 1999, Gulf Power received notification from FDEP that EPA issued a formal objection to the Crist Title V permit. In accordance with Florida law, the FDEP can not issue a final Title V Crist permit until the objection is resolved or withdrawn. Gulf Power may file a written reply to the objection within 45 days from the day FDEP serves notice to the applicant (i.e. September 13). Within 90 days (i.e. October 27), FDEP will have to resolve the objection by issuing a permit that satisfies EPA or EPA will assume authority for the permit. At this point, FDEP's role is one of a mediator between Gulf Power and EPA. All correspondence with EPA must flow through FDEP. Outlined below are Gulf Power comments regarding the issues raised by EPA which directly effect operations at Plant Crist. FDEP has agreed to provide additional comments other general process issues identified by EPA's letter of objection. Gulf Power's comments with those by FDEP will be forwarded by FDEP to EPA Region IV before September 13, 1999.

U.S. EPA Region 4 Objection

Proposed Part 70 Operating Permit
Gulf Power Company
Crist Electric Generating Plant
Permit no. 033045-001-AV

1. EPA Objection Issues

1. Periodic Monitoring: The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter limit for units 1-3. Condition A.15 of the permit only requires an annual test, which, according to conditions A.21, A.27, A.28, and A.29, may not even be required since this unit's primary fuel is natural gas (see Objection Issue 2). In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the particulate matter. The permit must require the source to conduct more frequent monitoring or a technical demonstration must be included in the statement of basis explaining why the State has chosen not to require any additional PM testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a test performed once a year.

Response: EPA accepted identical periodic monitoring permit language for Title V permits negotiated with FP&L. Florida has an approved alternative sampling procedure (ASP Number 97-B-01) dated July 2, 1997 which authorizes owners of natural gas fossil fuel steam generators to forgo particulate matter compliance testing on an annual basis and prior to renewal of an operation permit. Additionally, the order states that the Department (FDEP) shall not require submission of particulate matter emission compliance test results for any fossil fuel steam generator emissions unit that burned liquid and/or solid fuel for a total of no more than 400 hours during the year prior to renewal. The units identified in the issue are Crist Units 1-2-3. These units have not burned liquid fuel for more than 400 hours for generation per year in the past 10 years. Opacity and sulfur dioxide monitors were operated voluntarily on each unit (Crist 1-2-3) from approximately 1975 to 1994. During this time there were no excess emissions reported for any quarter above those allowed under Chapter 62-210.700 F.A.C. For this reason and due to the exemption of opacity monitoring allowed under the Clean Air Act Amendments of 1990 for gas units, Gulf Power upon agreement from FDEP removed the opacity and sulfur dioxide monitors from service on Crist Units 1-2-3 in 1994. Gulf Power believes the above information is sufficient as a technical demonstration for periodic monitoring to ensure compliance with the applicable particulate matter limit for Crist Units 1-2-3. (See Attachment A for ASP Number 97-B-01)

2. Compliance Testing: The permit is not clear about the frequency of testing that the facility needs to follow for particulate matter (PM) and visible emissions (VE). Condition A.15 states that the source must conduct annual testing for PM and VE. However, conditions A.21, A.27, A.28, and A.29 establish that the facility will conduct testing once a year if fuel oil is burned for more than 400 hours, and no testing is required otherwise. The permit needs to be clear about which one of these conditions the facility must follow to demonstrate compliance with the PM and VE limits. The same comment applies to conditions B.17 and B.26, and C.17 and C.26. Additionally, the permit needs to include the regulatory basis for conditions A.15, B.17 and C.17.

   Furthermore, EPA is concerned with the interaction of these conditions. The statement of basis indicates that the source will conduct annual testing for particulate matter for units 4-7. Therefore, we do not understand why the testing waivers are included for these units since they seem not to apply.

Response: Gulf Power somewhat agrees with EPA's item #2 objection in that the permit language is difficult to determine exactly what is required of the applicant. Gulf Power believes this issue can be corrected through better permit language or by the use of permit notes to direct the reader to the bottom line testing requirement of the permit (See item #1 above for Crist 1-2-3). It should be noted that this issue should not apply to Crist 4 & 5(EPA's reference to Condition B 17) and Crist 6 & 7 (Reference to Condition C.17) because they are coal fired generating units and conduct annual tests. Conditions B.17 and C.17 could be corrected by deleting any reference to "SO2" testing since CEMS are being used for compliance. Gulf Power suggests the following language for Condition A.15. Similar language is suggested for Conditions B.17 (Units 4 & 5) and C.17 (Units 6 & 7):

A. 15 Annual Tests Required. Units 001, 002, and 003 must conduct annual testing for particulate matter and visible emissions, except as provided under Condition A.21, A.27, and A.29 ~~in accordance with the requirements~~ listed below.

3. Appropriate Averaging Times: In order for the emissions standard for particulate matter contained in conditions A.7, B.7, and C.7 to be practicably enforceable, the appropriate averaging time must be specified in the permit. An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance.

Response: Conditions A.7, B.7 and C.7 make reference to averaging time by measurement by the applicable compliance method. Gulf Power believes the averaging times have been specified in the permit for opacity by the use of CEMs for compliance using a block 6 minute average under Condition B19 (Permit Note) and C19 (Permit Note). Additionally, compliance to sulfur dioxide standards are outlined by CEMs using a 24 hour average under Condition B23 and C23. Particulate Matter compliance is outlined under Condition B21 and C21 as the minimum time for a sample collection of a volume of 30 dry standard cubic feet.

4. Periodic Monitoring: Conditions B.17 and C.17 of the permit require the source to conduct annual testing for particulate matter. The statement of basis for the permit states that this testing frequency "is justified by the low emission rate documented in previous emissions tests while firing coal" and that the "Department has determined that sources with emissions less than half of the effective standard shall test annually."

   While EPA has in the past accepted this approach as adequate periodic monitoring for particulate matter, it has done so only for uncontrolled natural gas and fuel oil fired units. The units addressed in conditions B.17 and C.17 use add-on control equipment to comply with the applicable particulate matter standard. In order to provide reasonable assurance

of compliance, the results of an annual stack testing will have to be supplemented with additional monitoring. Furthermore, the results of an annual test alone would not constitute an adequate basis for the annual certification of compliance that the facility will have to submit for these units.

The most common approach to addressing periodic monitoring for particulate emission limits on units with add-on controls is to establish either an opacity or a control device parameter indicator range that would provide evidence of proper control device operation. The primary goal of such monitoring is to provide reasonable assurance of compliance, and one way of achieving this goal is to use opacity data or control device operating parameter data from previous successful compliance tests to identify a range of values that has corresponded to compliance in the past. Operating within the range of values identified in this manner would provide assurance that the control device is operating properly and would serve as the basis for an annual compliance certification. Depending upon the margin of compliance during the tests used to establish the opacity or control device indicator range, going outside the range could represent either a period of time when an exceedance of the applicable standard is likely or it could represent a trigger for initiating corrective action to prevent an exceedance of the standard. In order to avoid any confusion regarding the consequences of going outside the indicator range, the permit must clearly state if doing so is evidence that a standard has been exceeded and must specify whether corrective action must be taken when a source operates outside the established indicator range.

Response: Gulf Power disagrees with the above approach to address periodic monitoring for particulate emission limits. Gulf Power is concerned that the EPA suggested procedure is an attempt to implement Compliance Assurance Monitoring (CAM) before its legal requirement. Nevertheless, Gulf Power is willing to suggest alternative language to better address periodic monitoring for particulate matter for Plant Crist. Gulf Power proposes the following language for Plant Crist:

Periodic Monitoring for particulate matter is an annual particulate compliance test (PCT) for units with add on emission control systems that demonstrate a history (5 year average) of compliance of 40% or less of the applicable Florida particulate standard. Units not meeting this evaluation upon initial Title V permit issuance shall conduct a PCT semi-annually. Additionally, each base load electric generating unit having a continuous opacity monitor (COM) will meet on a quarterly basis EPA's Continuous Emission Monitoring Enforcement Plan (CEP) for the applicable opacity standard at 5% or less of Time on Line. Peaking units shall be evaluated similarly with the exception that start up and shut down operations shall be excluded. Should a unit exceed the 5% time on line evaluation in any quarter, a particulate compliance test (PCT) shall be conducted within the following operating quarter as defined by EPA under the Acid Rain Part 75 rules. (See Attachment B for the Plant Crist unit by unit evaluation.)

5. Periodic Monitoring: Condition C.7 specifies that particulate matter emissions from unit 6 shall not exceed 1,475 tons per year. Based upon the short term limit for this unit [0.1 pound/million British thermal units (BTUs)], heat input capacity (3,704.8 BTU/hour), and 8,760 hours of operation per year, unit 6 could emit 1,622.7 ton/year of particulate matter even if it is continuously meeting the applicable short-term particulate limit. Since this value exceeds the annual emission limit of 1,475 ton/year, the permit must be revised to include conditions specifying the procedures that Gulf Power will use to demonstrate compliance with the annual particulate emission limit for unit 6.

Because we increased heat input?

Response: Condition C7 was included in the Title V permit because it was include in an old Crist Unit 6 ESP Construction Permit for informational purposes only. FDEP granted Gulf Power an option of removing the condition upon publication of a public notice of change of the Crist Unit 6 Construction Permit. For the sake of timeliness and need for expediency to acquire a final Title V

permit, Gulf Power has elected to forgo further delay to the process by accepting the annual condition. Gulf Power, however does seek the right to delete this condition in the future upon a more positive timely response scenario. Gulf Power proposes that compliance to the condition shall be determined by submission of an annual certification by the responsible official based on data calculated and submitted in the required Annual Operating Report (AOR).

6. Periodic Monitoring: Condition C.9 specifies that, when burning solid fuel, sulfur dioxide emissions from unit 6 shall not exceed 87,035 tons per year. Although Condition C.16 indicates that monitoring to assure compliance with this limit will be conducted with the SO_2 continuous emission monitor installed on unit 6, data from the flue gas flow rate monitor installed on this unit is needed in order to convert the data from the SO_2 monitor into an hourly mass emission rate that can be totaled in order to verify compliance with the annual SO_2 emission limit. Therefore, Condition C.16 must be revised to require that both the SO_2 and flue gas flow rate monitors be used to determine SO_2 emission rates on unit 6.

Response: Condition C7 was included in the Title V permit because it was include in an old Crist Unit 6 ESP Construction Permit for informational purposes only. FDEP granted Gulf Power an option of removing the condition upon publication of a public notice of change of the Crist Unit 6 Construction Permit. For the sake of timeliness and need for expediency to acquire a final Title V permit, Gulf Power has elected to forgo further delay to the process by accepting the annual condition. Gulf Power, however does seek the right to delete this condition in the future upon a more positive timely response scenario. Gulf Power proposes that compliance to the condition shall be determined by submission of an annual certification by the responsible official based on data calculated and submitted in the required Annual Operating Report (AOR). Gulf Power does not agree with EPA that compliance must be determined by the use of flue gas flow monitors.

7. Periodic Monitoring: Conditions D.7 and D.8 of the permit require that an annual Method 9 test be conducted for these units. In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the visible emissions standard. The permit must require the source to conduct visible emissions observations on a daily basis (Method 22), and that a Method 9 test be conducted within 24 hours of any abnormal qualitative survey. As an alternative to this approach, a technical demonstration can be included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a short-term test performed once a year.

Response: Gulf Power does not agree that daily Method 22 visible emissions tests are needed to constitute adequate periodic monitoring for equipment (Fly Ash Silo) referenced in Condition D.7 and D.8. A technical demonstration using annual opacity test results is available to demonstrate that the source is < 50% of the standard. A historical evaluation (five year average) of annual opacity compliance tests for the Crist Fly Ash Silo reveal compliance at an average of less than 1% opacity. Gulf Power believes this is an adequate technical demonstration for periodic monitoring for visible emissions for the Crist Fly Ash Silo. (See Attachment B)

8. Acid Rain: Please note that the Phase II Averaging Plan submitted by the source is an enforceable part of this permit. The Averaging Plan, Phase II NO_x Compliance and Phase II Acid Rain Permit Application should be referenced and attached as enforceable parts of the Title V permit. We note that Phase II permit applications, Phase II NO_x Compliance Plans and the Phase II Averaging Plans submitted by this source are referenced in Section IV, Condition A.1.of the proposed permit and on page 1 of the permit in a section entitled, "Referenced attachments made part of this permit".

However, the forms and the referenced dates of these two parts of the permit do not coincide and do not appear to reflect the complete signed forms as submitted by the source. It is important that the specific forms and applications (signed and dated by the designated representative) be attached to the permit as enforceable parts of the permit and that they are completely and accurately referenced.

Response: FDEP to correct permit language to better reflect this requirement. update dates.

9. Acid Rain: The language contained in section 70.6(a)(1)(ii), regarding Acid Rain Program requirements in title V is not addressed in the Acid Rain Part of the permit and does not appear to be included in elsewhere in the body of the proposed permit. This condition needs to be added to the proposed title V permit for this source.

Response: FDEP to correct permit language to better reflect this requirement. Language from Bruce

II. General Comments

1. Section II, condition 1: Please make sure that Appendix TV-2 reflects the updated version of condition 51, as it is contained in Appendix TV-3.

Response: FDEP to correct permit language to better reflect this requirement. change to TV-3 ?

2. Section II, condition 12: Please correct the address, telephone and fax number for the Air Enforcement Section. All required reports should be sent to the Air Enforcement Section (AES), not the Operating Source Section. The correct telephone and fax numbers for AES are 404/562-9055 and 404/562-9163, respectively. Additionally, please delete the information concerning the submission of Acid Rain information. Region 4 does not have an Acid Rain Section.

Response: FDEP to correct permit language to better reflect this requirement. correct as noted.

3. Statement of Basis: The statement of basis indicates that each emission unit is subject to a particulate matter emissions limit of 0.1 lb/MMBtu, and this limit is effectively equivalent to 0.149 lb/MMBtu due to rounding. This is also stated for conditions of soot blowing, where the particulate matter emission limit of 0.3 lb/MMBtu would be equivalent to 0.349 lb/MMBtu. However, these statements are incorrect. A measured emission rate of 0.149 lb/MMBtu actually rounds to 0.15 lb/MMBtu rather than 0.1 lb/MMBtu, which is in excess of the emission limit, and therefore not allowable.

According to the June 6, 1990 memorandum "Performance Test Calculation Guidelines", issued by William G. Laxton, Director of the Technical Support Division, OAQPS, and John S. Seitz, Director of the Stationary Source Compliance Division, OAQPS, when calculating and reporting emission rates and concentrations in determining compliance with the new source performance standards (NSPS) and national emission standards for hazardous pollutants (NESHAP), as well as state implementation plans (SIP's), all emission standards should be considered to have at least two significant figures (SF's), but no more than three. Therefore, since the 0.1 lb/MMBtu emission limit for particulate matter comes from the Florida state SIP, it should be considered to have two SF's. In this case, the emission limit effectively becomes 0.10 lb/MMBtu. In order to comply with the emission limit of 0.1 lb/MMBtu, the highest allowable measured emission rate (measured to four SF's) is 0.1049 lb/MMBtu. Please correct the statement of basis to reflect the above discussion.

Response: Gulf Power does not agree with the EPA objection regarding Florida's particulate emissions standard. Gulf Power recommends that FDEP remove direct reference to the numerical standard in the standard of basis. FDEP should reference the FP&L agreement regarding this issue in finalizing a response. doesn't apply

4. Section IV, Acid Rain Part: Please note that the allowances allocated to the Crist Plant units 4,5,6,7, as indicated under Section IV, Condition A.2 of the proposed permit have been changed. This revision was published in the Federal Register on September 28, 1998 (Vol. 63 No. 187, pp 51706-51765). We recommend that the allowances that are indicated for these units be adjusted to reflect the revised allocation.

Response: FDEP to correct permit language to better reflect this requirement. will be updated

5. Appendix CP-1: Appendix CP-1, "Alternate Phase II NO_x Compliance Plan" of the proposed permit for the Gulf Power Company - Crist Plant requires that the designated representative of the Crist Plant provide certification that the NO_x averaging plan has been approved by all the other involved permitting authorities prior to Florida's approval of the plan. The procedure, as indicated in the "Appendix CP-1" of this proposed permit, does not appear to consider future revisions to a previously approved Phase II NO_x Averaging Plan. Each year of a plan, the permittee has the option of submitting a revision to an approved averaging plan by January 1 of the calendar year for which the averaging plan is to become effective. Condition 2 of "Appendix CP-1" specifically addresses the approval of the current Phase II Averaging Plan and does not discuss Florida's approval procedures for revisions to an Phase II NO_x Averaging Plan. Condition 3 of "Appendix CP-1" indicates that should the designated representative fail to submit the required certification under this Appendix then the source would be required to comply to the applicable Phase II NO_x emission limits specified in 40 CFR § 76.5. Please note that 40 CFR § 76.11(b)(3) indicates that when an averaging plan or a revision to an approved averaging plan is not approved, the owner or operator of each unit in the plan shall operate the unit in compliance with the emission limitation that would apply in the absence of an averaging plan or revision to a plan. Therefore, in the case where the permittee has an approved averaging plan but wishes to revise the plan, the approval of the revision is not final until all permitting authorities have approved the revision. Should the revision not be approved, then the permittee is required to comply with the originally approved (assuming it has been approved for multiple years) plan in absence of the revision. Appendix CP-1 should be revised to specify that the conditions contained in the appendix only apply to the particular averaging plan attached to this permit and does not prescribe procedures that should be followed for future revisions to the plan.

   Region 4's concern regarding the Rule 62-214.330(3)(b) requiring the designated representatives of a source in a multi-agency Phase II Averaging Plan to certify that every other affected permitting authority has approved the plan prior to the State of Florida's approval was indicated in a letter sent to Mr. Howard Rhodes from Mr. Douglas Neeley on December 9, 1997. It was Region 4's understanding, at that time, that Florida's Rule 62-214.330 was scheduled to be revised to avoid conflicts (such as has been described above) with 40 CFR Part 76. Appendix CP-1 was prepared so that the approval process would not be delayed in the interim. Please provide Region 4 with a schedule indicating when the revision is to occur.

Response: FDEP to address this issue. This C.P. only designed to address initial issuance. any future revisions will require a new (different) comp. Plan.

ASP Number 97-B-01
(With Scrivener's Order Dated July 9, 1997)

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of:	)	
	)	
Florida Electric Power Coordinating Group, Inc.,	)	ASP No. 97-B-01
	)	
Petitioner.	)	

ORDER ON REQUEST FOR ALTERNATE PROCEDURES AND REQUIREMENTS

Pursuant to Rule 62-297.620, Florida Administrative Code (F.A.C.), the Florida Electric Coordinating Group, Incorporated, (FCG) petitioned for approval to: (1) Exempt fossil fuel steam generators which burn liquid and/or solid fuel for less than 400 hours during the federal fiscal year from the requirement to conduct an annual particulate matter compliance test; and, (2) Exempt fossil fuel steam generators which burn liquid and/or solid fuel for less than 400 hours during the federal fiscal year from the requirement to conduct an annual particulate matter compliance test during the year prior to renewal of an operation permit. This Order is intended to clarify particulate testing requirements for those fossil fuel steam generators which primarily burn gaseous fuels including, but not necessarily limited to natural gas.

Having considered the provisions of Rule 62-296.405(1), F.A.C., Rule 62-297.310(7), F.A.C., and all supporting documentation, the following Findings of Fact, Conclusions of Law, and Order are entered:

FINDINGS OF FACT

1. The Florida Electric Power Coordinating Group, Incorporated, petitioned the Department to exempt those fossil fuel steam generators which have a heat input of more than 250 million Btu per hour and burn solid and/or liquid fuel less than 400 hours during the year from the requirement to conduct an annual particulate matter compliance test. [Exhibit 1]

2. Rule 62-296.405(1)(a), F.A.C., applies to those fossil fuel steam generators that are not subject to the federal standards of performance for new stationary sources (NSPS) in 40 CFR 60 and which have a heat input of more than 250 million Btu per hour.

3. Rule 62-296.405(1)(a), F.A.C., limits visible emissions from affected fossil fuel steam generators to, "20 percent opacity except for either one six-minute period per hour during which

not exceed 40 percent. The option selected shall be specified in the emissions unit's construction and operation permits. Emissions units governed by this visible emission limit shall test for particulate emission compliance annually and as otherwise required by Rule 62-297, F.A.C."

4. Rule 62-296.405(1)(a), F.A.C., further states, "Emissions units electing to test for particulate matter emission compliance quarterly shall be allowed visible emissions of 40 percent opacity. The results of such tests shall be submitted to the Department. Upon demonstration that the particulate standard has been regularly complied with, the Secretary, upon petition by the applicant, shall reduce the frequency of particulate testing to no less than once annually.

5. Rule 297.310(7)(a)1., F.A.C., states, "The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit."

6. Rule 297.310(7)(a)2., F.A.C., states, "The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision.

7. Rule 297.310(7)(a)3., F.A.C., further states, "In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal: a. Did not operate; or, b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours."

8. Rule 297.310(7)(a)4., F.A.C., states, "During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for: a. Visible emissions, if there is an applicable standard; b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant..."

9. Rule 297.310(7)(a)5., F.A.C., states. "An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours."

10. Rule 297.310(7)(a)6., F.A.C., states, "For fossil fuel steam generators on a semi-annual particulate matter emission compliance testing schedule, a compliance test shall not be

required for any six-month period in which liquid and/or solid fuel is not burned for more than 200 hours other than during startup."

11. Rule 297.310(7)(a)7., F.A.C., states, "For emissions units electing to conduct particulate matter emission compliance testing quarterly pursuant to Rule 62-296.405(2)(a), F.A.C., a compliance test shall not be required for any quarter in which liquid and/or solid fuel is not burned for more than 100 hours other than during startup." [Note: The reference should be to Rule 62-296.405(1)(a), F.A.C., rather than Rule 62-296.405(2)(a), F.A.C.]

12. The fifth edition of the U. S. Environmental Protection Agency's Compilation of Air Pollutant Emission Factors, AP-42, that emissions of filterable particulate from gas-fired fossil fuel steam generators with a heat input of more than about 10 million Btu per hour may be expected to range from 0.001 to 0.006 pound per million Btu. [Exhibit 2]

13. Rule 62-296.405(1)(b), F.A.C. and the federal standards of performance for new stationary sources in 40 CFR 60.42, Subpart D, limit particulate emissions from uncontrolled fossil fuel fired steam generators with a heat input of more than 250 million Btu to 0.1 pound per million Btu.

CONCLUSIONS OF LAW

1. The Department has jurisdiction to consider the matter pursuant to Section 403.061, Florida Statutes (F.S.), and Rule 62-297.620, F.A.C.

2. Pursuant to Rule 62-297.310(7), F.A.C., the Department may require Petitioner to conduct compliance tests that identify the nature and quantity of pollutant emissions, if, after investigation, it is believed that any applicable emission standard or condition of the applicable permits is being violated.

3. There is reason to believe that a fossil fuel steam generator which does not burn liquid and/or solid fuel (other than during startup) for a total of more than 400 hours in a federal fiscal year and complies with all other applicable limits and permit conditions is in compliance with the applicable particulate mass emission limiting standard.

ORDER

Having considered the requirements of Rule 62-296.405, F.A.C., Rule 62-297.310, F.A.C., and supporting documentation, it is hereby ordered that:

1. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours;

2. For fossil fuel steam generators on a semi-annual particulate matter emission compliance testing schedule, a compliance test shall not be required for any six-month period in which liquid and/or solid fuel is not burned for more than 200 hours other than during startup;

3. For emissions units electing to conduct particulate matter emission compliance testing quarterly pursuant to Rule 62-296.405(1)(a), F.A.C., a compliance test shall not be required for any quarter in which liquid and/or solid fuel is not burned for more than 100 hours other than during startup;

4. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of particulate matter emission compliance test results for any fossil fuel steam generator emissions unit that burned liquid and/or solid fuel for a total of no more than 400 hours during the year prior to renewal.

5. Pursuant to Rule 62-297.310(7), F.A.C., owners of affected fossil fuel steam generators may be required to conduct compliance tests that identify the nature and quantity of pollutant emissions, if, after investigation, it is believed that any applicable emission standard or condition of the applicable permits is being violated.

6. Pursuant to Rule 62-297.310(8), F.A.C., owners of affected fossil fuel steam generators shall submit the compliance test report to the District Director of the Department district office having jurisdiction over the emissions unit and, where applicable, the Air Program Administrator of the appropriate Department-approved local air program within 45 days of completion of the test.

PETITION FOR ADMINISTRATIVE REVIEW

The Department will take the action described in this Order unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 of the Florida Statutes, or a party requests mediation as an alternative remedy under section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed decision may petition for an administrative hearing in accordance with 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 must be filed within 21 days of receipt of this Order. 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 (or a request for mediation, as discussed below) 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 of

the Florida Statutes, 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 of the Florida Administrative Code.

A petition must contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department File Number, and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by each petitioner, if any;

(e) A statement of facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement identifying the rules or statutes each petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by each petitioner, stating precisely the action each petitioner wants the Department to take with respect to the Department's action or proposed action in the notice of intent.

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 Order. 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 person whose substantial interests are affected by the Department's proposed decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information:

(a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any;

(b) A statement of the preliminary agency action;

(c) A statement of the relief sought; and

(d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following:

(a) The names, addresses, and telephone numbers of any persons who may attend the mediation;

(b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;

(c) The agreed allocation of the costs and fees associated with the mediation;

(d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;

(e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;

(f) The name of each party's representative who shall have authority to settle or recommend settlement; and

(g) The signatures of all parties or their authorized representatives.

As provided in section 120.573 of the Florida Statutes, the timely agreement of all parties to mediate will toll the time limitations imposed by sections 120.569 and 120.57 for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such a modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under sections 120.569 and 120.57 remain available for disposition of the dispute, and the notice will

specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

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 of the Florida Statutes. 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) of the Florida Statutes, 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

each of those terms is defined in section 120.542(2) of the Florida Statutes, 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.

This Order constitutes final agency action unless a petition is filed in accordance with the above paragraphs. Upon timely filing of a petition, this Order will not be effective until further Order of the Department.

RIGHT TO APPEAL

Any party to this Order has the right to seek judicial review of the Order 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 Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, 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 of Appeal must be filed within 30 days from the date the Notice of Agency Action is filed with the Clerk of the Department.

DONE AND ORDERED this 17 day of March, 1997 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Howard L. Rhodes

HOWARD L. RHODES, Director
Division of Air Resources Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(904) 488-0114

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that a copy of the foregoing was mailed to Rich Piper, Chair, Florida Power Coordinating Group, Inc., 405 Reo Street, Suite 100, Tampa, Florida 33609-1004, on this 18th day of March 1997.

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.

Mary Lou Wise 3-18-97
Clerk Date

FLORIDA ELECTRIC POWER COORDINATING GROUP, INC. (FCG)
08 REO STREET, SUITE 100 • (813) 289-5644 • FAX (813) 289-5646
AMPA, FLORIDA 33609-1004

January 28, 1997

Clair H. Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32301

RE: Comments Regarding Draft Title V Permits

Dear Mr. Fancy:

The Florida Electric Power Coordinating Group, Inc. (FCG), which is made up of 36 utilities owned by investors, municipalities, and cooperatives, has been following the implementation of Title V in Florida and recently submitted comments to you on draft Title V permit conditions by letter dated December 4, 1996. As indicated in that letter, representatives from the FCG would like to meet with you and other members of your air permitting staff to discuss some significant concerns that FCG member companies have regarding conditions that may be included in Title V permits issued by your office. While we will be discussing these issues with you and your staff in greater detail at that meeting, we would like to explain some of our concerns in this letter.

Primarily, the FCG members are concerned that the Title V permits may contain conditions that are much different in important respects than those conditions currently included in existing air permits. During the rulemaking workshops and seminars conducted by the Department to discuss the rules implementing the Title V permitting program, representations were made on several occasions that industry could expect to see permit conditions that were substantively similar to existing permit conditions and that primarily the format was changing. Representations were also made to industry that Title V did not impose additional substantive requirements beyond what was already required under the Department's rules. Based on the first draft Title V permit that we have reviewed, we are concerned that there may be some attempt to change the substantive requirements on existing facilities through the Title V permitting process, and we would like to discuss this with you at the meeting we have scheduled for January 30, 1997.

1. Federal Enforceability--The FCG has long been concerned about the designation of non-federally enforceable permit terms and conditions. We are concerned about this issue because the Department's first draft Title V permits have included language stating that *all* terms and conditions would become federally enforceable once the permit is issued. This approach is consistent with the Department's guidance memorandum dated September 13, 1996 (DAPM-PER/V-18), but we understand that the Department may now intend to remove all references to

the federal enforceability of permit terms and conditions. We are also concerned about this approach because a Title V permit is generally federally enforceable and, without any designation of non-federally enforceable terms and conditions, the entire permit could be interpreted to be federally enforceable. As we stated in the December 4 letter as well as our letter dated October 11, 1996, all terms and conditions in a Title V permit do *not* become enforceable by the U.S. Environmental Protection Agency and citizens under the Clean Air Act simply by inclusion in a Title V permit. To make it clear which provisions in a Title V permit are not federally enforceable (which are being included because of state or local requirements only), it is very important to specifically designate those conditions as having no federally enforceable basis. Such a designation is actually required under the federal Title V rules, which provide that permitting agencies are to "specifically designate as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements." 40 CFR § 70.6(b). We would like to discuss with you our concerns about this issue and to again specifically request that when Title V permits are issued by the Department, conditions having no federally enforceable basis clearly be identified as such.

2. PM Testing on Gas--The FCG understands that the Department may attempt to require annual particulate matter compliance testing while firing natural gas to determine compliance with the 0.1 lb/mmBtu emission limit established under Rule 62-296.405(1)(b), F.A.C. The FCG member companies feel strongly that compliance testing for particulate matter should not be required while firing natural gas. The Department has not historically required particulate matter compliance testing while firing natural gas, it is not required under the current permits for these units, and it should not be necessary since natural gas is such a clean fuel. Typically only *de minimis* amounts of particulate matter would be expected from the firing of natural gas, so compliance testing would not provide meaningful information to the Department, and the expense to conduct such tests is not justified. We understand that Department representatives suggested that industry could pursue an alternative test procedure under Rule 62-297.620, F.A.C., to allow a visible emissions test to be used in lieu of a stack test for determining compliance with the particulate matter limit. While certainly a visible emissions test would be preferable over a stack test, neither of these tests should be needed to demonstrate compliance with the particulate matter limit of 0.1 lb/mmBtu while burning natural gas. The FCG strongly urges that the Department reconsider its position on this issue and clarify that compliance testing for particulate matter while firing natural gas is not required.

3. Excess Emissions--By letter dated December 5, 1996, the U.S. Environmental Protection Agency (EPA) submitted a letter commenting on a draft Title V permit that had been issued by the Department and indicated some concern regarding excess emission provisions included in conditions that were quoted from Rule 62-210.700, F.A.C. Because the permit conditions cited simply quote the applicable provisions of the Department's rules regarding

excess emissions and because these rules have been approved as part of Florida's State Implementation Plan, the permit conditions are appropriate to be included in the permit. We understand that the Department intends to include as applicable requirements in Title V permit conditions the provisions of Rule 62-210.700, F.A.C. If the Department receives any further adverse comments regarding the excess emissions rule under 62-210.700, F.A.C., we would appreciate your contacting us. Because this issue is so important to us, we would like to discuss it with you in greater detail at our meeting on January 30.

4. Compliance Testing for Combustion Turbines--While the Department's November 22, 1995, guidance regarding the compliance testing requirements for combustion turbines clearly states that the use of heat input curves based on ambient temperatures and humidities is to be included as a permit condition *only* if requested by a permittee, we understand that the Department may intend to include this requirement in Title V permits for all combustion turbines. As we are sure you recall, the FCG worked over a period of several months with the Department on the development of the guidance memorandum and it was clearly understood by FCG members that the heat input curves would not be mandated but would remain voluntary for any existing combustion turbine. It was also understood by FCG members that the requirement to conduct testing at 95 to 100 percent of capacity would be required only if the permit applicant requested the use of heat input curves. We understand that the Department may be interpreting the requirement to use heat input curves and to test at 95 to 100 percent of permitted capacity to be mandatory for all combustion turbines. We would like to clarify this with you during our meeting. Also, we would like to confirm that, regardless of whether a combustion turbine uses heat input curves or tests at 95 to 100 percent of permitted capacity, it is necessary to test at four load points and correct to ISO *only* to determine compliance with the nitrogen oxides (NOx) standard under New Source Performance Standard Subpart GG under 40 CFR § 60.332 and not annually thereafter.

5. Test Methods--The FCG is concerned about the possibility of the Department requiring a full permit revision to authorize the use of an approved test method not specifically identified in a Title V permit, even though the Department may have separately approved the use of the particular test method for a unit (i.e., through a compliance test protocol). It is the FCG's position that language should be included in all Title V permits indicating that other test methods approved by the Department may be used. Further, a full permit revision (including public notice) should *not* be necessary when a test method not previously identified in the permit is approved for use by a unit. The Department's subsequent approval of test methods should simply be included in the next permit renewal cycle. The FCG understands that the Department planned to confirm this approach with the U.S. Environmental Protection Agency Region IV, and we would like to discuss this issue with you at the January 30 meeting to learn of the agency's response.

6. Quarterly Reports--The FCG understands that the Department may be interpreting the quarterly reporting requirements under Rule 62-296.405(1)(g), F.A.C., to apply regardless of whether continuous emissions monitors were required under the preceding Rule 62-296.405(1)(f), F.A.C. It is the FCG's position that quarterly reports are required under Rule 62-296.405(1)(g) only when continuous emissions monitors are required under the preceding paragraph (f). While this may not be entirely clear from the language of the rules, paragraphs (f) and (g) were originally included in a separate rule on "continuous emission monitoring requirements" where it was very clear that the requirements of paragraph (g) applied *only* if continuous emission monitoring was required under paragraph (f). Research indicates that Rule 17-2.710, F.A.C. (copy attached), where these provisions were originally located, was first transferred to Rule 17-297.500, F.A.C. (which later became Rule 62-297.500), later repealed in November of 1994, and ultimately replaced with what is now Rule 62-296.405(1)(f) and (g), F.A.C. To the extent that an emissions unit is not subject to Rule 62-296.405(1)(f) and is not required to install and operate continuous emissions monitors (e.g., oil- and gas-fired units), the quarterly reporting requirements of paragraph (g) should not apply.

7. Trivial Activities--As you may recall, in May of 1996, the FCG submitted to the Department a list of small, *de minimis* emissions units and activities that it considered to be "trivial," consistent with the list developed by EPA as part of the Title V "White Paper" and incorporated by reference by the Department in its March 15, 1996, guidance memorandum (DARM-PER/V-15-Revised). We never received a response from the Department and now understand that the Department may not have made a determination as to whether any of the emission units or activities on the list should qualify as "trivial." This is an important issue to the FCG because only "trivial" activities can be omitted from the Title V permit application and permit, and ultimately omitted from emission estimates in the annual air operation reports under Rule 62-210.370(3), F.A.C. The FCG remains hopeful that the Department will consider its request to determine that most, if not all, of the emission units and activities on the May, 1996, list to be "trivial." We would like to discuss a possible resolution of this issue with you and your staff at the January 30 meeting.

8. Permit Shield--The FCG continues to be concerned about the language in Conditions 5 and 20 of Appendix TV-1, Title V Conditions, which circumvents the permit shield provisions under Section 403.0872(15), Florida Statutes, and Rule 62-213.460, F.A.C. The FCG believes that these conditions should be deleted in their entirety. To the extent that the Department attempts to caveat the applicability of those conditions, the FCG believes that it is important to cite to not only the regulatory citation for the permit shield but the statutory citation as well.

Thank you again for considering the FCG's comments on the draft Title V permits. We very much appreciate the cooperation we have received from the Department throughout the

Title V implementation process, and we look forward to our meeting later this week. If you have any questions in the meantime, please call me at 561-625-7661.

Sincerely,

Rich Piper

Rich Piper, Chair
FCG Air Subcommittee

Enclosures

cc: Howard L. Rhodes, DEP
John Brown, DEP
Pat Comer, DEP OGC
Scott M. Sheplak, DEP
Edward Svec, DEP
FCG Air Subcommittee
Angela Morrison, FGSS

ssscr

AP-42
FIFTH EDITION
JANUARY 1995

COMPILATION OF AIR POLLUTANT EMISSION FACTORS

VOLUME I: STATIONARY POINT AND AREA SOURCES

Office Of Air Quality Planning And Standards
Office Of Air And Radiation
U. S. Environmental Protection Agency
Research Triangle Park, NC 27711

January 1995

Exhibit 2

1.4 Natural Gas Combustion

1.4.1 General[1-2]

Natural gas is one of the major fuels used throughout the country. It is used mainly for industrial process steam and heat production; for residential and commercial space heating; and for electric power generation. Natural gas consists of a high percentage of methane (generally above 80 percent) and varying amounts of ethane, propane, butane, and inerts (typically nitrogen, carbon dioxide, and helium). Gas processing plants are required for the recovery of liquefiable constituents and removal of hydrogen sulfide before the gas is used (see Section 5.3, Natural Gas Processing). The average gross heating value of natural gas is approximately 8900 kilocalories per standard cubic meter (1000 British thermal units per standard cubic foot), usually varying from 8000 to 9400 kcal/scm (900 to 1100 Btu/scf).

1.4.2 Emissions And Controls[3-5]

Even though natural gas is considered to be a relatively clean-burning fuel, some emissions can result from combustion. For example, improper operating conditions, including poor air/fuel mixing, insufficient air, etc., may cause large amounts of smoke, carbon monoxide (CO), and organic compound emissions. Moreover, because a sulfur-containing mercaptan is added to natural gas to permit leak detection, small amounts of sulfur oxides will be produced in the combustion process.

Nitrogen oxides (NO_x) are the major pollutants of concern when burning natural gas. Nitrogen oxide emissions depend primarily on the peak temperature within the combustion chamber as well as the furnace-zone oxygen concentration, nitrogen concentration, and time of exposure at peak temperatures. Emission levels vary considerably with the type and size of combustor and with operating conditions (particularly combustion air temperature, load, and excess air level in boilers).

Currently, the two most prevalent NO_x control techniques being applied to natural gas-fired boilers (which result in characteristic changes in emission rates) are low NO_x burners and flue gas recirculation. Low NO_x burners reduce NO_x by accomplishing the combustion process in stages. Staging primarily delays the combustion process, resulting in a cooler flame which suppresses NO_x formation. The three most common types of low NO_x burners being applied to natural gas-fired boilers are staged air burners, staged fuel burners, and radiant fiber burners. Nitrogen oxide emission reductions of 40 to 85 percent (relative to uncontrolled emission levels) have been observed with low NO_x burners. Other combustion staging techniques which have been applied to natural gas-fired boilers include low excess air, reduced air preheat, and staged combustion (e.g., burners-out-of-service and overfire air). The degree of staging is a key operating parameter influencing NO_x emission rates for these systems.

In a flue gas recirculation (FGR) system, a portion of the flue gas is recycled from the stack to the burner windbox. Upon entering the windbox, the gas is mixed with combustion air prior to being fed to the burner. The FGR system reduces NO_x emissions by two mechanisms. The recycled flue gas is made up of combustion products which act as inerts during combustion of the fuel/air mixture. This additional mass is heated in the combustion zone, thereby lowering the peak flame temperature and reducing the amount of NO_x formed. To a lesser extent, FGR also reduces NO_x emissions by lowering the oxygen concentration in the primary flame zone. The amount of flue gas recirculated is a key operating parameter influencing NO_x emission rates for these systems. Flue gas

recirculation is normally used in combination with low NO_x burners. When used in combination, these techniques are capable of reducing uncontrolled NO_x emissions by 60 to 90 percent.

Two post-combustion technologies that may be applied to natural gas-fired boilers to reduce NO_x emissions by further amounts are selective noncatalytic reduction and selective catalytic reduction. These systems inject ammonia (or urea) into combustion flue gases to reduce inlet NO_x emission rates by 40 to 70 percent.

Although not measured, all particulate matter (PM) from natural gas combustion has been estimated to be less than 1 micrometer in size. Particulate matter is composed of filterable and condensable fractions, based on the EPA sampling method. Filterable and condensable emission rates are of the same order of magnitude for boilers; for residential furnaces, most of the PM is in the form of condensable material.

The rates of CO and trace organic emissions from boilers and furnaces depend on the efficiency of natural gas combustion. These emissions are minimized by combustion practices that promote high combustion temperatures, long residence times at those temperatures, and turbulent mixing of fuel and combustion air. In some cases, the addition of NO_x control systems such as FGR and low NO_x burners reduces combustion efficiency (due to lower combustion temperatures), resulting in higher CO and organic emissions relative to uncontrolled boilers.

Emission factors for natural gas combustion in boilers and furnaces are presented in Tables 1.4-1, 1.4-2, and 1.4-3.[6] For the purposes of developing emission factors, natural gas combustors have been organized into four general categories: utility/large industrial boilers, small industrial boilers, commercial boilers, and residential furnaces. Boilers and furnaces within these categories share the same general design and operating characteristics and hence have similar emission characteristics when combusting natural gas. The primary factor used to demarcate the individual combustor categories is heat input.

Table 1.4-1 (Metric And English Units). EMISSION FACTORS FOR PARTICULATE MATTER (PM) FROM NATURAL GAS COMBUSTION[a]

Combustor Type (Size, 10^6 Btu/hr Heat Input) (SCC)[b]	Filterable PM[c]			Condensable PM[d]		
	kg/10^6 m^3	lb/10^6 ft^3	RATING	kg/10^6 m^3	lb/10^6 ft^3	RATING
Utility/large industrial boilers (> 100) (1-01-006-01, 1-01-006-04)	16 - 80	1 - 5	D	ND	ND	NA
Small industrial boilers (10 - 100) (1-02-006-02)	99	6.2	D	120	7.5	D
Commercial boilers (0.3 - < 10) (1-03-006-03)	72	4.5	C	120	7.5	C
Residential furnaces (< 0.3) (No SCC)	2.8	0.18	C	180	11	D

[a] References 9-14. All factors represent uncontrolled emissions. Units are kg of pollutant/10^6 cubic meters natural gas fired and lb of pollutant/10^6 cubic feet natural gas fired. Based on an average natural gas higher heating value of 8270 kcal/m^3 (1000 Btu/scf). The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. ND = no data. NA = not applicable.

[b] SCC = Source Classification Code.

[c] Filterable PM is that particulate matter collected on or prior to the filter of an EPA Method 5 (or equivalent) sampling train.

[d] Condensable PM is that particulate matter collected using EPA Method 202, (or equivalent). Total PM is the sum of the filterable PM and condensable PM. All PM emissions can be assumed to be less than 10 micrometers in aerodynamic equivalent diameter (PM-10).

Table 1.4-2 (Metric And English Units). EMISSION FACTORS FOR SULFUR DIOXIDE (SO_2), NITROGEN OXIDES (NO_x), AND CARBON MONOXIDE (CO) FROM NATURAL GAS COMBUSTION[a]

Combustor Type (Size, 10^6 Btu/hr Heat Input) (SCC)[b]	SO_2[c]			NO_x[d]			CO[e]		
	kg/10^6 m^3	lb/10^6 ft^3	RATING	kg/10^6 m^3	lb/10^6 ft^3	RATING	kg/10^6 m^3	lb/10^6 ft^3	RATING
Utility/large Industrial Boilers (> 100) (1-01-006-01, 1-01-006-04)									
Uncontrolled	9.6	0.6	A	8800	550[f]	A	640	40	A
Controlled - Low NO_x burners	9.6	0.6	A	1300	81[f]	D	ND	ND	NA
Controlled - Flue gas recirculation	9.6	0.6	A	850	53[f]	D	ND	ND	NA
Small Industrial Boilers (10 - 100) (1-02-006-02)									
Uncontrolled	9.6	0.6	A	2240	140	A	560	35	A
Controlled - Low NO_x burners	9.6	0.6	A	1300	81[f]	D	980	61	D
Controlled - Flue gas recirculation	9.6	0.6	A	480	30	C	590	37	C
Commercial Boilers (0.3 - < 10) (1-03-006-03)									
Uncontrolled	9.6	0.6	A	1600	100	B	330	21	C
Controlled - Low NO_x burners	9.6	0.6	A	270	17	C	425	27	C
Controlled - Flue gas recirculation	9.6	0.6	A	580	36	D	ND	ND	NA
Residential Furnaces (<0.3) (No SCC)									
Uncontrolled	9.6	0.6	A	1500	94	B	640	40	B

[a] Units are kg of pollutant/10^6 cubic meters natural gas fired and lb of pollutant/10^6 cubic feet natural gas fired. Based on an average natural gas fired higher heating value of 8270 kcal/m^3 (1000 Btu/scf). The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. ND = no data. NA = not applicable.

[b] SCC = Source Classification Code.

[c] Reference 7. Based on average sulfur content of natural gas, 4600 g/10^6 Nm^3 (2000 gr/10^6 scf).

Table 1.4-2 (cont.).

[d] References 10,15-19. Expressed as NO_2.. For tangentially fired units, use 4400 kg/10^6 m^3 (275 lb/10^6 ft^3). At reduced loads, multiply factor by load reduction coefficient in Figure 1.4-1. Note that NO_x emissions from controlled boilers will be reduced at low load conditions.

[e] References 9-10,16-18,20-21.

[f] Emission factors apply to packaged boilers only.

Table 1.4-1 (Metric And English Units). EMISSION FACTORS FOR CARBON DIOXIDE (CO_2) AND TOTAL ORGANIC COMPOUNDS (TOC) FROM NATURAL GAS COMBUSTION[a]

Combustor Type (Size, 10^6 Btu/hr Heat Input) (SCC)[b]	CO_2[c]			TOC[d]		
	kg/10^6 m^3	lb/10^6 ft^3	RATING	kg/10^6 m^3	lb/10^6 ft^3	RATING
Utility/large industrial boilers (> 100) (1-01-006-01, 1-01-006-04)	ND[e]	ND	NA	28[f]	1.7[f]	C
Small industrial boilers (10 - 100) (1-02-006-02)	1.9 E+06	1.2 E+05	D	92[g]	5.8[g]	C
Commercial boilers (0.3 - < 10) (1-03-006-03)	1.9 E+06	1.2 E+05	C	128[h]	8.0[h]	C
Residential furnaces (No SCC)	2.0 E+06	1.3 E+05	D	180[h]	11[h]	D

[a] All factors represent uncontrolled emissions. Units are kg of pollutant/10^6 cubic meters and lb of pollutant/10^6 cubic feet. Based on an average natural gas higher heating value of 8270 kcal/m^3 (1000 Btu/scf). The emission factors in this table may be converted to other natural gas heating values by multiplying the given factor by the ratio of the specified heating value to this average heating value. NA = not applicable.

[b] SCC = Source Classification Code.

[c] References 10,22-23.

[d] References 9-10,18.

[e] ND = no data.

[f] Reference 8: methane comprises 17% of organic compounds.

[g] Reference 8: methane comprises 52% of organic compounds.

[h] Reference 8: methane comprises 34% of organic compounds.

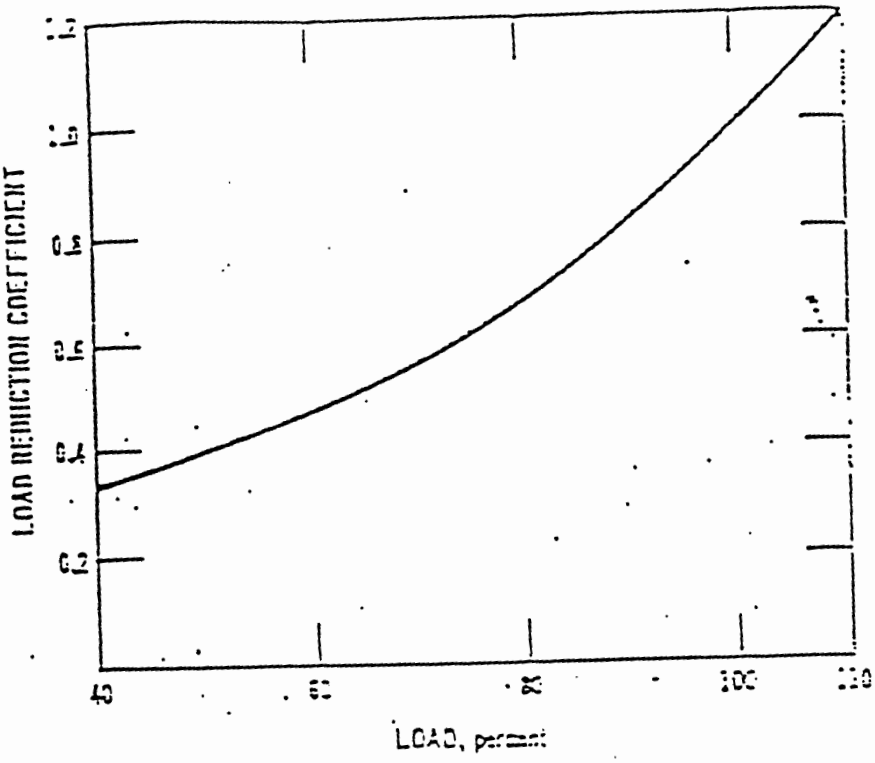

Figure 1.4-1. Load reduction coefficient as a function of boiler load. (Used to determine NO_x reductions at reduced loads in large boilers.)

References For Section 1.4

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2. *Chemical Engineers' Handbook, Fourth Edition*, J. H. Perry, Editor, McGraw-Hill Book Company, New York, NY, 1963.

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Fine Particulate Emissions From Stationary and Miscellaneous Sources in the South Coast Air Basin, California Air Resources Board Contract No. A6-191-30, KVE, Inc., Tustin, CA, February 1979.

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9. J. L. Muhlbaier, "Particulate and Gaseous Emissions From Natural Gas Furnaces and Water Heaters", *Journal of the Air Pollution Control Association*, December 1981.

10. *Field Investigation of Emissions From Combustion Equipment for Space Heating*, EPA-R2-73-084a, U. S. Environmental Protection Agency, Research Triangle Park, NC, June 1973.

11. N. F. Suprenant, *et al.*, *Emissions Assessment of Conventional Stationary Combustion Systems, Volume I: Gas and Oil Fired Residential Heating Sources*, EPA-600/7-79-029b, U. S. Environmental Protection Agency, Washington, DC, May 1979.

12. C. C. Shih, *et al.*, *Emissions Assessment of Conventional Stationary Combustion Systems, Volume III: External Combustion Sources for Electricity Generation*, EPA Contract No. 68-02-2197, TRW, Inc., Redondo Beach, CA, November 1980.

13. N. F. Suprenant, *et al.*, *Emissions Assessment of Conventional Stationary Combustion Systems, Volume IV: Commercial/Institutional Combustion Sources*, EPA Contract No. 68-02-2197, GCA Corporation, Bedford, MA, October 1980.

14. N. F. Suprenant, *et al.*, *Emissions Assessment of Conventional Stationary Combustion Systems, Volume V: Industrial Combustion Sources*, EPA Contract No. 68-02-2197, GCA Corporation, Bedford, MA, October 1980.

15. *Emissions Test on 200 HP Boiler at Kaiser Hospital in Woodland Hills*, Energy Systems Associates, Tustin, CA, June 1986.

16. *Results From Performance Tests: California Milk Producers Boiler No. 5*, Energy Systems Associates, Tustin, CA, November 1984.

17. *Source Test For Measurement of Nitrogen Oxides and Carbon Monoxide Emissions From Boiler Exhaust at GAF Building Materials*, Pacific Environmental Services, Inc., Baldwin Park, CA, May 1991.

18. J. P. Kesselring and W. V. Krill, "A Low-NO_x Burner For Gas-Fired Firetube Boilers", *Proceedings: 1985 Symposium on Stationary Combustion NO_x Control, Volume 2*, EPRI CS-4360, Electric Power Research Institute, Palo Alto, CA, January 1986.

19. *NO_x Emission Control Technology Update*, EPA Contract No. 68-01-6558, Radian Corporation, Research Triangle Park, NC, January 1984.

20. *Background Information Document For Small Steam Generating Units*, EPA-450/3-87-000, U. S. Environmental Protection Agency, Research Triangle Park, NC, 1987.

Evaluation of the Pollutant Emissions From Gas-Fired Forced Air Furnaces: Research Report No. 1503, American Gas Association Laboratories, Cleveland, OH, May 1975.

Thirty-day Field Tests of Industrial Boilers: Site 5 - Gas-fired Low-NO_x Burner, EPA-600/7-81-095a, U. S. Environmental Protection Agency, Research Triangle Park, NC, May 1981.

Private communication from Kim Black (Industrial Combustion) to Ralph Harris (MRI), Independent Third Party Source Tests, February 7, 1991

FLORIDA

Department of
Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 9, 1997

Certified Mail - Return Receipt Requested

Mr. Rich Piper, Chair
Florida Power Coordinating Group, Inc.
405, Reo Street, Suite 100
Tampa, Florida 33609-1004

Dear Mr. Piper:

Enclosed is a copy of a Scrivener's Order correcting an error in the Order concerning particulate matter testing of natural gas fired boilers.

If you have any questions concerning the above, please call Yogesh Manocha at 904/488-6140, or write to me.

Sincerely,

M. D. Harley, P.E., DEE
P.E. Administrator
Emissions Monitoring Section
Bureau of Air Monitoring and
Mobile Sources

MDH:ym

cc: Dotty Diltz, FDEP
Pat Comer, FDEP

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of:	)	
	)	
Florida Electric Power Coordinating Group, Inc.,	)	ASP No. 97-B-01
	)	
Petitioner.	)	

ORDER CORRECTING SCRIVENER'S ERROR

The Order which authorizes owners of natural gas fired fossil fuel steam generators to forgo particulate matter compliance testing on an annual basis and prior to renewal of an operation permit entered on the 17th day of March, 1997, is hereby corrected on page 4, paragraph number 4, by deleting the words "pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C.":

4. In renewing an air operation permit ~~pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C.,~~ the Department shall not require submission of particulate matter emission compliance test results for any fossil fuel steam generator emissions unit that burned liquid and/or solid fuel for a total of no more than 400 hours during the year prior to renewal.

DONE AND ORDERED this 2 day of July, 1997 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Howard L. Rhodes

HOWARD L. RHODES, Director
Division of Air Resources Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(904) 488-0114

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that a copy of the foregoing was mailed to Rich Piper, Chair, Florida Power Coordinating Group, Inc., 405 Reo Street, Suite 100, Tampa, Florida 33609-1004, on this 10TH day of July 1997.

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.

Martha Jewell Wise 7/10/97
Clerk Date

ATTACHMENT B

Opacity Excess Emissions Summary for Crist (1992-1998)

Year		94				95				96				97				98				5 Year Avg
Quarter		1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	
Crist 4	% Excess emissions	0.2	0.1	0.3	0.2	0.6	0.1	0.0	0.6	0.1	0.3	0.3	0.3	0.0	0.1	0.2	0.3	0.1	0.0	0.1	0.1	0.2
	% CMS Downtime	0.0	0.5	0.0	0.0	1.0	0.1	0.1	0.1	0.5	0.1	0.3	0.1	0.1	0.1	0.1	0.2	0.4	0.6	0.1	0.5	0.2
	Total Percent	0.2	0.6	0.3	0.2	1.6	0.2	0.1	0.7	0.6	0.4	0.6	0.4	0.1	0.2	0.3	0.5	0.5	0.6	0.2	0.6	0.4
Crist 5	% Excess emissions	0.2	0.3	0.2	0.2	2.0	1.0	1.0	0.8	0.1	0.1	0.4	0.3	0.1	0.4	0.2	0.8	0.1	0.2	0.4	0.0	0.4
	% CMS Downtime	0.0	0.0	0.0	0.0	1.0	0.1	0.2	0.1	0.0	0.1	0.1	0.0	0.1	0.0	0.2	0.1	0.1	0.1	0.1	0.2	0.1
	Total Percent	0.2	0.3	0.2	0.2	3.0	1.1	1.2	0.9	0.1	0.2	0.5	0.3	0.2	0.4	0.4	0.9	0.2	0.3	0.5	0.2	0.6
Crist 6	% Excess emissions	0.9	1.2	0.2	0.2	0.1	0.1	0.2	0.1	0.0	0.1	0.0	0.1	0.1	0.1	0.2	0.1	0.1	0.1	0.0	0.1	0.2
	% CMS Downtime	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.1	0.0	0.0	0.0	0.1	0.0	0.4	0.0	0.1	0.1	0.0	0.1
	Total Percent	0.9	1.2	0.2	0.2	0.1	0.1	0.2	0.3	0.0	0.2	0.0	0.1	0.1	0.2	0.2	0.5	0.1	0.2	0.1	0.1	0.3
Crist 7	% Excess emissions	0.4	0.4	0.2	0.5	0.4	0.5	0.3	0.3	0.4	0.2	0.3	0.3	1.0	2.1	0.3	0.5	2.2	0.2	0.8	0.2	0.6
	% CMS Downtime	0.0	0.2	0.5	0.3	0.0	0.1	0.0	0.1	0.1	0.7	0.4	0.0	0.0	0.4	0.0	0.1	0.1	0.0	0.0	0.1	0.2
	Total Percent	0.4	0.6	0.7	0.8	0.4	0.6	0.3	0.4	0.5	0.9	0.7	0.3	1.0	2.5	0.3	0.6	2.3	0.2	0.8	0.3	0.7

Gulf Power Steady State Particulate Emission Tests Summary (1992-1998)

Unit	1994	1995	1996	1997	1998	5 Year Avg
Limit	0.1	0.1	0.1	0.1	0.1	0.1
Crist 4	0.015	0.012	0.012	0.010	0.008	0.011
Crist 5	0.061	0.069	0.029	0.027	0.011	0.039
Crist 6	0.006	0.003	0.003	0.010	0.012	0.007
Crist 7	0.037	0.016	0.037	0.041	0.072	0.041
Smith 1	0.017	0.021	0.017	0.019	0.029	0.021
Smith 2	0.021	0.015	0.028	0.025	0.049	0.028
Scholz 1	0.018	0.023	0.035	0.024	0.016	0.023
Scholz 2	0.020	0.013	0.016	0.013	0.010	0.014

PLANT CRIST FLYASH SILO
OPACITY EVALUATION

	OPACITY	
YEAR	"A" SILO	"B" SILO
1998	0%	0%
1997	0%	0%
1996	0%	0%
1995	0.8%	0.2%
1994	2.2%	2.1%
AVERAGE	0.6%	0.46%

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 2 2 1999

4APT-ARB

Howard L. Rhodes, Director
Air Resources Management Division
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: EPA's Review of Proposed Title V Permit
Gulf Power Company
Crist Electric Generating Plant
Permit No. 033045-001-AV

Dear Mr. Rhodes:

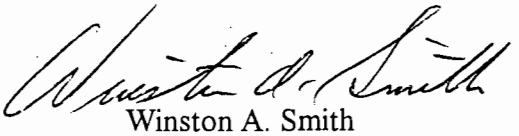
The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for Gulf Power Company - Crist Electric Generating Plant, which was posted on DEP's web site on June 8, 1999. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The basis of EPA's objection is that the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. § 70.6(a)(3)(i), and has inadequate provisions to address various Acid Rain program requirements.

Section 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

Pursuant to 40 C.F.R. § 70.8(c), this letter and its enclosure contain a detailed explanation of the objection issues and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70. The enclosure also contains general comments applicable to the permit.

If you have any questions or wish to discuss this further, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141. Should your staff need additional information they may contact Ms. Gracy R. Danois, Florida Title V Contact, at (404) 562-9119, or Ms. Angelia Souder-Blackwell, Associate Regional Counsel, at (404) 562-9527.

Sincerely,



Winston A. Smith
Director
Air, Pesticides & Toxics
Management Division

Enclosure

cc: Mr. Robert G. Moore
Gulf Power Company

Enclosure

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Gulf Power Company
Crist Electric Generating Plant
Permit no. 033045-001-AV

I. EPA Objection Issues

1. Periodic Monitoring: The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter limit for units 1-3. Condition A.15 of the permit only requires an annual test, which, according to conditions A.21, A.27, A.28, and A.29, may not even be required since this unit's primary fuel is natural gas (see Objection Issue 2). In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the particulate matter. The permit must require the source to conduct more frequent monitoring or a technical demonstration must be included in the statement of basis explaining why the State has chosen not to require any additional PM testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a test performed once a year.

2. Compliance Testing: The permit is not clear about the frequency of testing that the facility needs to follow for particulate matter (PM) and visible emissions (VE). Condition A.15 states that the source must conduct annual testing for PM and VE. However, conditions A.21, A.27, A.28, and A.29 establish that the facility will conduct testing once a year if fuel oil is burned for more than 400 hours, and no testing is required otherwise. The permit needs to be clear about which one of these conditions the facility must follow to demonstrate compliance with the PM and VE limits. The same comment applies to conditions B.17 and B.26, and C.17 and C.26. Additionally, the permit needs to include the regulatory basis for conditions A.15, B.17 and C.17.

   Furthermore, EPA is concerned with the interaction of these conditions. The statement of basis indicates that the source will conduct annual testing for particulate matter for units 4-7. Therefore, we do not understand why the testing waivers are included for these units since they seem not to apply.

3. Appropriate Averaging Times: In order for the emissions standard for particulate matter contained in conditions A.7, B.7, and C.7 to be practicably enforceable, the appropriate averaging time must be specified in the permit. An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance.

4. Periodic Monitoring: Conditions B.17 and C.17 of the permit require the source to conduct annual testing for particulate matter. The statement of basis for the permit states that this testing frequency "is justified by the low emission rate documented in previous emissions tests while firing coal" and that the "Department has determined that sources with emissions less than half of the effective standard shall test annually."

While EPA has in the past accepted this approach as adequate periodic monitoring for particulate matter, it has done so only for uncontrolled natural gas and fuel oil fired units. The units addressed in conditions B.17 and C.17 use add-on control equipment to comply with the applicable particulate matter standard. In order to provide reasonable assurance of compliance, the results of an annual stack testing will have to be supplemented with additional monitoring. Furthermore, the results of an annual test alone would not constitute an adequate basis for the annual certification of compliance that the facility will have to submit for these units.

The most common approach to addressing periodic monitoring for particulate emission limits on units with add-on controls is to establish either an opacity or a control device parameter indicator range that would provide evidence of proper control device operation. The primary goal of such monitoring is to provide reasonable assurance of compliance, and one way of achieving this goal is to use opacity data or control device operating parameter data from previous successful compliance tests to identify a range of values that has corresponded to compliance in the past. Operating within the range of values identified in this manner would provide assurance that the control device is operating properly and would serve as the basis for an annual compliance certification. Depending upon the margin of compliance during the tests used to establish the opacity or control device indicator range, going outside the range could represent either a period of time when an exceedance of the applicable standard is likely or it could represent a trigger for initiating corrective action to prevent an exceedance of the standard. In order to avoid any confusion regarding the consequences of going outside the indicator range, the permit must clearly state if doing so is evidence that a standard has been exceeded and must specify whether corrective action must be taken when a source operates outside the established indicator range.

5. Periodic Monitoring: Condition C.7 specifies that particulate matter emissions from unit 6 shall not exceed 1,475 tons per year. Based upon the short term limit for this unit [0.1 pound/million British thermal units (BTUs)], heat input capacity (3,704.8 BTU/hour), and 8,760 hours of operation per year, unit 6 could emit 1,622.7 ton/year of particulate matter even if it is continuously meeting the applicable short-term particulate limit. Since this value exceeds the annual emission limit of 1,475 ton/year, the permit must be revised to include conditions

specifying the procedures that Gulf Power will use to demonstrate compliance with the annual particulate emission limit for unit 6.

6. Periodic Monitoring: Condition C.9 specifies that, when burning solid fuel, sulfur dioxide emissions from unit 6 shall not exceed 87,035 tons per year. Although Condition C.16 indicates that monitoring to assure compliance with this limit will be conducted with the SO_2 continuous emission monitor installed on unit 6, data from the flue gas flow rate monitor installed on this unit is needed in order to convert the data from the SO_2 monitor into an hourly mass emission rate that can be totaled in order to verify compliance with the annual SO_2 emission limit. Therefore, Condition C.16 must be revised to require that both the SO_2 and flue gas flow rate monitors be used to determine SO_2 emission rates on unit 6.

7. Periodic Monitoring: Conditions D.7 and D.8 of the permit require that an annual Method 9 test be conducted for these units. In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the visible emissions standard. The permit must require the source to conduct visible emissions observations on a daily basis (Method 22), and that a Method 9 test be conducted within 24 hours of any abnormal qualitative survey. As an alternative to this approach, a technical demonstration can be included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a short-term test performed once a year.

8. Acid Rain: Please note that the Phase II Averaging Plan submitted by the source is an enforceable part of this permit. The Averaging Plan, Phase II NO_x Compliance and Phase II Acid Rain Permit Application should be referenced and attached as enforceable parts of the Title V permit. We note that Phase II permit applications, Phase II NO_x Compliance Plans and the Phase II Averaging Plans submitted by this source are referenced in Section IV, Condition A.1.of the proposed permit and on page 1 of the permit in a section entitled, "Referenced attachments made part of this permit". However, the forms and the referenced dates of these two parts of the permit do not coincide and do not appear to reflect the complete signed forms as submitted by the source. It is important that the specific forms and applications (signed and dated by the designated representative) be attached to the permit as enforceable parts of the permit and that they are completely and accurately referenced.

9. Acid Rain: The language contained in section 70.6(a)(1)(ii), regarding Acid Rain Program requirements in title V is not addressed in the Acid Rain Part of the permit and does not appear to be included in elsewhere in the body of the proposed permit. This condition needs to be added to the proposed title V permit for this source.

II. General Comments

1. Section II, condition 1: Please make sure that Appendix TV-2 reflects the updated version of condition 51, as it is contained in Appendix TV-3.

2. Section II, condition 12: Please correct the address, telephone and fax number for the Air Enforcement Section. All required reports should be sent to the Air Enforcement Section (AES), not the Operating Source Section. The correct telephone and fax numbers for AES are 404/562-9055 and 404/562-9163, respectively. Additionally, please delete the information concerning the submission of Acid Rain information. Region 4 does not have an Acid Rain Section.

3. Statement of Basis: The statement of basis indicates that each emission unit is subject to a particulate matter emissions limit of 0.1 lb/MMBtu, and this limit is effectively equivalent to 0.149 lb/MMBtu due to rounding. This is also stated for conditions of soot blowing, where the particulate matter emission limit of 0.3 lb/MMBtu would be equivalent to 0.349 lb/MMBtu. However, these statements are incorrect. A measured emission rate of 0.149 lb/MMBtu actually rounds to 0.15 lb/MMBtu rather than 0.1 lb/MMBtu, which is in excess of the emission limit, and therefore not allowable.

   According to the June 6, 1990 memorandum "Performance Test Calculation Guidelines", issued by William G. Laxton, Director of the Technical Support Division, OAQPS, and John S. Seitz, Director of the Stationary Source Compliance Division, OAQPS, when calculating and reporting emission rates and concentrations in determining compliance with the new source performance standards (NSPS) and national emission standards for hazardous pollutants (NESHAP), as well as state implementation plans (SIP's), all emission standards should be considered to have at least two significant figures (SF's), but no more than three. Therefore, since the 0.1 lb/MMBtu emission limit for particulate matter comes from the Florida state SIP, it should be considered to have two SF's. In this case, the emission limit effectively becomes 0.10 lb/MMBtu. In order to comply with the emission limit of 0.1 lb/MMBtu, the highest allowable measured emission rate (measured to four SF's) is 0.1049 lb/MMBtu. Please correct the statement of basis to reflect the above discussion.

4. Section IV, Acid Rain Part: Please note that the allowances allocated to the Crist Plant units 4,5,6,7, as indicated under Section IV, Condition A.2 of the proposed permit have been changed. This revision was published in the Federal Register on September 28, 1998 (Vol. 63 No. 187, pp 51706-51765). We recommend that

the allowances that are indicated for these units be adjusted to reflect the revised allocation.

5. Appendix CP-1: Appendix CP-1, "Alternate Phase II NO_x Compliance Plan" of the proposed permit for the Gulf Power Company - Crist Plant requires that the designated representative of the Crist Plant provide certification that the NO_x averaging plan has been approved by all the other involved permitting authorities prior to Florida's approval of the plan. The procedure, as indicated in the "Appendix CP-1" of this proposed permit, does not appear to consider future revisions to a previously approved Phase II NO_x Averaging Plan. Each year of a plan, the permittee has the option of submitting a revision to an approved averaging plan by January 1 of the calendar year for which the averaging plan is to become effective. Condition 2 of "Appendix CP-1" specifically addresses the approval of the current Phase II Averaging Plan and does not discuss Florida's approval procedures for revisions to an Phase II NO_x Averaging Plan. Condition 3 of "Appendix CP-1" indicates that should the designated representative fail to submit the required certification under this Appendix then the source would be required to comply to the applicable Phase II NO_x emission limits specified in 40 CFR § 76.5. Please note that 40 CFR § 76.11(b)(3) indicates that when an averaging plan or a revision to an approved averaging plan is not approved, the owner or operator of each unit in the plan shall operate the unit in compliance with the emission limitation that would apply in the absence of an averaging plan or revision to a plan. Therefore, in the case where the permittee has an approved averaging plan but wishes to revise the plan, the approval of the revision is not final until all permitting authorities have approved the revision. Should the revision not be approved, then the permittee is required to comply with the originally approved (assuming it has been approved for multiple years) plan in absence of the revision. Appendix CP-1 should be revised to specify that the conditions contained in the appendix only apply to the particular averaging plan attached to this permit and does not prescribe procedures that should be followed for future revisions to the plan.

Region 4's concern regarding the Rule 62-214.330(3)(b) requiring the designated representatives of a source in a multi-agency Phase II Averaging Plan to certify that every other affected permitting authority has approved the plan prior to the State of Florida's approval was indicated in a letter sent to Mr. Howard Rhodes from Mr. Douglas Neeley on December 9, 1997. It was Region 4's understanding, at that time, that Florida's Rule 62-214.330 was scheduled to be revised to avoid conflicts (such as has been described above) with 40 CFR Part 76. Appendix CP-1 was prepared so that the approval process would not be delayed in the interim. Please provide Region 4 with a schedule indicating when the revision is to occur.

cpy to: Jonathan

INTEROFFICE MEMORANDUM

Date: 28-Aug-1999 10:34pm
From: Huey.Joel
Huey.Joel@epamail.epa.gov
Dept:
Tel No:

Subject: Comments on KY periodic monitoring for utilities

Scott,

We don't have the KY proposed permits in electronic format. I have several pages I want to fax to you. Here are the comments we made on their monitoring approach for particulate emissions.

For units with a 40% opacity standard we made the following "significant" comment:

Emission Units 01 and 02 (Indirect Heat Exchangers): For periodic monitoring of particulate emissions, Condition B.4.d. requires the source to initiate inspections and repairs whenever any six minute average opacity value exceeds the opacity standard. This condition also requires compliance demonstration via stack testing at the end of each quarter in which COM data show excursions for five percent or greater of the quarter. Using the applicable 40 percent opacity standard as the action level for particulate emissions may not be protective of the applicable mass emission limit. To provide reasonable assurance of compliance, an opacity action level (probably less than 40 percent) could be added to the permit along with corrective action measures to be taken when deviations are noted. Another option would be parametric monitoring of the control equipment. A brief justification of the approach selected should be provided in the Statement of Basis.

For units with a 20% opacity standard we made the following "general" comment:

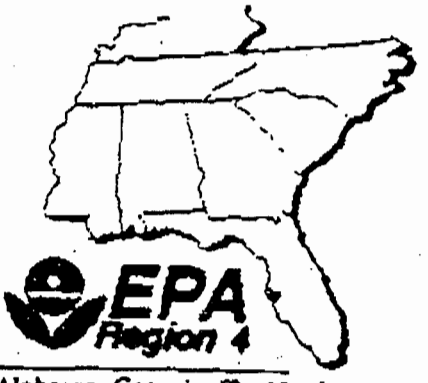
Emission Units 01 and 02 (Indirect Heat Exchangers): For periodic monitoring of particulate emissions, Condition B.4.b. requires the source to initiate inspections and repairs whenever any six minute average opacity value exceeds the opacity standard. This condition also requires compliance demonstration via stack testing at the end of each quarter in which COM data show excursions for five percent or greater of the quarter. Using the applicable opacity standard as the action level for particulate emissions may or may not be protective of the applicable mass emission limit. Therefore, please include in the Statement of Basis a discussion of the selection process for the opacity value that is used as an action level for particulate. It is possible that the action level that provides reasonable assurance of compliance with the mass emission standard will be lower than the applicable standard.

Joel Huey
(404) 562-9104

EPA United States Environmental Protection Agency

facsimile TRANSMITTAL

cc/to: Jonathan



Mississippi, Tennessee, Alabama, Georgia, Florida, Kentucky, South Carolina, North Carolina

To: Scott Sheplak

Fax #: (850) 922-6979

Subject: Periodic Monitoring language

From: Joel Huey **Phone#:** (404) 562-9104

Date: 8/27/99

Pages: 8, including this cover sheet.

COMMENTS:

Condition 4.B. is the one we discussed on the phone

EPA United States Environmental Protection Agency

Air & Radiation Technology Branch
U.S. Environmental Protection Agency
61 Forsyth Street, SW, 12th Floor
Atlanta, Georgia 30303

404-562-9105
Fax: 404-562-9095

SECTION B EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Emissions Unit 01 (W1) Indirect Heat Exchanger

Description:

Dry-bottom, wall-fired, pulverized coal-fired unit equipped with electrostatic precipitator, flue gas desulfurization unit and low NO_x burners
Number two fuel oil used for startup and stabilization
Secondary fuel: petroleum coke
Maximum continuous rating: 4,585 MMBTU/hour
Construction commenced: December 1978

Applicable Regulations:

Regulation 401 KAR 59:016, New electric utility steam generating units incorporating by reference 40 CFR 60, Subpart Da, Standards of performance for electric utility steam generating units applicable to an emission unit with a capacity of more than 250 mmBTU per hour and commenced on or after September 19, 1978.
Regulation 40 CFR 60, Appendix F, Quality Assurance Procedures
Regulation 40 CFR 52.21, (a) through (i) and (s) through (w), Prevention of significant deterioration of air quality applicable to major construction or modification commenced before August 7, 1979.

1. **Operating Limitations:**
   None

2. **Emission Limitations:**

   a) Pursuant to Regulations 401 KAR 59:016, Section 3(1), and 40 CFR 52.21, particulate emissions shall not exceed 0.03 lb/MMBTU based on a six-hour average. Pursuant to Regulation 401 KAR 59:016, Section 6(1), compliance with the 0.03 lb/MMBTU emission limitation constitute compliance with the 99 percent reduction requirement contained in Regulation 401 KAR 59:016, Section 3(2).

   b) Pursuant to Regulation 401 KAR 59:016, Section 3(2), emissions shall not exceed twenty (20) percent opacity based on a six-minute average except a maximum of twenty-seven (27) percent for not more than one (1) six (6) minute period per hour.

   c) Pursuant to Regulations 401 KAR 59:016, Section 4(1) and 40 CFR 52.21, sulfur dioxide emissions shall be reduced by ninety (90) percent and shall not exceed 1.2 lbs/MMBTU or shall be reduced by seventy (70) percent and shall not exceed 0.60 lb/MMBTU based on a thirty (30) day rolling average.

SECTION B EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

d) Pursuant to Regulation 401 KAR 59:016, Section 5(1)(c), nitrogen oxides emission shall not exceed 0.6 lb/MMBTU based on a thirty (30) day rolling average. Pursuant to Regulation 401 KAR 59:016, Section 6(2), compliance with the 0.6 lb/MMBTU emission limitation will constitute compliance with the 65 percent reduction requirement contained in Regulation 401 KAR 59:016, Section 5(2).

e) Pursuant to Regulation 401 KAR 59:016, Section 6(3), particulate matter and nitrogen oxides emission standards apply at all times except during periods of startup, shutdown, or malfunction. The sulfur dioxide emission standard apply at all times except during periods of startup, shutdown, or when both emergency conditions exist and the procedures under Regulation 401 KAR 59:016, Section 6(4) are implemented.

3. **Testing Requirements:**

a) The permittee shall submit a schedule within six months from the issuance date of this permit to conduct at least one performance test for particulate within one year following the issuance of this permit.

b) If no additional stack tests are performed pursuant to Condition 4. b), the permittee shall conduct a performance test for particulate emissions within the third year of the term of this permit to demonstrate compliance with the allowable standard.

c) The permittee shall determine the opacity of emissions from the stack by EPA Reference Method 9 annually, or more frequently if requested by the division.

4. **Specific Monitoring Requirements:**

a) Pursuant to Regulation 401 KAR 50:035, Section 7(1)(c), Regulation 401 KAR 59:016, Section 7 and Regulation 401 KAR 59:005, Section 4, the permittee shall install, calibrate, maintain, and operate continuous emission monitoring systems for measuring the opacity of emissions, sulfur dioxide emissions, nitrogen oxides emissions and either oxygen or carbon dioxide emissions. Oxygen or carbon dioxide shall be monitored at each location where sulfur dioxide or nitrogen oxides emissions are monitored. The owner or operator shall ensure the continuous emission monitoring systems are in compliance with the requirements of Regulation 401 KAR 59:005, Section 4.

SECTION B EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

b) Pursuant to Regulation 401 KAR 50:035, Section 7(1)(c), to meet the periodic monitoring requirement for particulate, the permittee shall use a continuous opacity monitor (COM). Excluding the startup, shut down, and once per hour exemption periods, if any six minute average opacity value exceeds the opacity standard, the permittee shall, as appropriate, initiate an inspection of the control equipment and/or the COM system and make any necessary repairs. If five (5) percent or greater of COM data (excluding startup, shut down, and malfunction periods, data averaged over six minute period) recorded in a calender quarter show excursions above the opacity standard, the permittee shall perform a stack test in the following calender quarter to demonstrate compliance with the particulate standard while operating at representative conditions. The permittee shall submit a compliance test protocol as required by condition Section G(a)(21) of this permit before conducting the test. The division may waive this testing requirement upon a demonstration that the cause(s) of the excursions have been corrected, or may require stack tests at any time pursuant to Regulation 401 KAR 50:045, Performance Tests.

Opacity

c) Pursuant to Regulation 401 KAR 50:035, Section 7(1)(c), to meet the periodic monitoring requirement for opacity, the permittee shall use a continuous opacity monitor (COM). Excluding the startup, shut down, and once per hour exemption periods, if any six minute average opacity value exceeds to the opacity standard, the permittee shall, as appropriate, initiate an inspection of the control equipment and/or the COM system and make any necessary repairs. If visible emissions from the stack are perceived or believed to exceed the applicable standard, the permittee shall determine the opacity of emissions by Reference Method 9. If a Method 9 test cannot be performed, the reason for not performing the test shall be documented.

d) Pursuant to Regulation 401 KAR 50:035, Section 7(1)(c), to meet the periodic monitoring requirement for sulfur dioxide, the permittee shall use a continuous emission monitor (CEM). Excluding the startup and shut down periods, if any 3-hour average sulfur dioxide value exceeds that standard, the permittee shall, as appropriate, initiate an inspection of the control equipment and/or the CEM system and make any necessary repairs as soon as practicable.

e) Pursuant to Regulation 401 KAR 50:035, Section 7(1)(c), to meet the periodic monitoring requirement for nitrogen oxide, the permittee shall use a continuous emission monitor (CEM). Excluding the startup and shut down periods, if any 3-hour average nitrogen oxide value exceeds the standard, the permittee shall, as appropriate, initiate an investigation of the cause of the exceedance and/or the CEM system and make any necessary repairs or take any corrective actions as soon as practicable.

f) Pursuant to Regulation 401 KAR 59:016, Section 7(2), the permittee shall monitor sulfur dioxide emission using continuous monitoring system at both the inlet and outlet of the sulfur dioxide control device. An "as fired" fuel monitoring system meeting the requirements of Reference Method 19 may be used to determine potential sulfur dioxide emissions in place of a continuous emission monitor at the inlet of the sulfur dioxide control device.

SECTION B EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

g) Pursuant to Regulation 401 KAR 59:016, Section 7(5), all the continuous emission monitoring systems shall be operated and data shall be recorded during all periods of operation of the emissions units including periods of startup, shutdown, malfunction or emergency conditions, except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments.

h) Pursuant to Regulation 401 KAR 59:016, Section 7(6), when emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, the permittee shall obtain emission data by using other monitoring systems as approved by the division or the reference methods as described in Regulation 401 KAR 59:016, Section 7(8) to provide emission data for a minimum of eighteen hours in at least twenty-two out of thirty successive boiler operating days.

i) Pursuant to Regulation 401 KAR 59:016, Section 7(9), the following procedures shall be used to conduct monitoring system performance evaluations and calibration checks as required under Regulation 401 KAR 59:005, Section 4(3).

1. Reference Method 6 or 7, as applicable shall be used for conducting performance evaluations of sulfur dioxide and nitrogen oxides continuous emission monitoring systems.

2. Sulfur dioxide or nitrogen oxides, as applicable, shall be used for preparing calibration mixtures under Performance Specification 2 of Appendix B to 40 CFR 60 filed by reference in Regulation 401 KAR 50:015.

3. The span value for the continuous monitoring system for measuring opacity shall be between sixty (60) and eighty (80) percent and for the continuous monitoring system for measuring nitrogen oxides shall be 1,000 ppm.

4. The span value for the continuous monitoring system for measuring sulfur dioxide at the inlet to the sulfur dioxide control device shall be 125 percent of the maximum estimated hourly potential emissions of the fuel fired, and at the outlet of the control device shall be 50 percent of the maximum estimated hourly potential emissions of the fuel fired, or span values as specified in 40 CFR 75, Appendix A.

5. **Specific Record Keeping Requirements:**

a) Pursuant to Regulation 401 KAR 59:005, Section 3(4), the owner or operator of the indirect heat exchanger shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems and devices; and all other information required by Regulation 401 KAR 59:005 recorded in a permanent form suitable for inspection.

SECTION B EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

b) Pursuant to Regulation 401 KAR 59:005, Section 3(2), the owner or operator of this unit shall maintain the records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the affected facility, any malfunction of the air pollution control equipment; or any period during which a continuous monitoring system or monitoring device is inoperative.

c) The permittee shall compute and record percentage of the COM data (excluding startup, shut down, and malfunction data) showing excursions above the opacity standard in each calender quarter.

d) The permittee shall maintain the results of all compliance tests.

6. Specific Reporting Requirements:

a) Pursuant to Regulation 401 KAR 59:005, Section 3(3), minimum data requirements which follow shall be maintained and furnished in the format specified by the division. Owners or operators of facilities required to install continuous monitoring systems shall submit for every calendar quarter a written report of excess emissions (as defined in applicable sections) to the division. All quarterly reports shall be postmarked by the thirtieth (30th) day following the end of each calendar quarter and shall include the following information:

1) The magnitude of the excess emission computed in accordance with the Regulation 401 KAR 59:005, Section 4(8), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions.

2) All hourly averages shall be reported for sulfur dioxide and nitrogen oxides monitors. The hourly averages shall be made available in the format specified by the division.

3) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.

4) The date and time identifying each period during which continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.

5) When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

6) For sulfur dioxide and nitrogen oxides, all information listed in Regulation 401 KAR 59:016, Section 9(2) shall be reported to the division for each twenty-four (24) hour period.

SECTION B EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

7) If the minimum quantity of emission data as required by Regulation 401 KAR 59:016, Section 7(6) is not obtained for any thirty successive boiler operating days, the permittee shall report all the information listed in Regulation 401 KAR 59:016, Section 9(3) for that thirty day period.

8) If any sulfur dioxide standards as specified in Regulation 401 KAR 59:016, Section 4 are exceeded during emergency conditions because of control system malfunction, the permittee shall submit a signed statement including all information as described in Regulation 401 KAR 59:016, Section 9(4).

9) If fuel pretreatment credit toward the sulfur dioxide emission standard under Regulation 401 KAR 59:016, Section 4 is claimed, the permittee shall submit a signed statement including all information as described in Regulation 401 KAR 59:016, Section 9(5).

10) For any periods for which opacity, sulfur dioxide or nitrogen oxides emissions data are not available, the permittee shall submit a signed statement pursuant to Regulation 401 KAR 59:016, Section 9(6) indicating if any changes were made in the operation of the emission control system during the period of data unavailability. Operations of control system and emissions units during periods of data unavailability are to be compared with operation of the control system and emissions units before and following the period of data unavailability.

11) The permittee shall submit a signed statement including all information as described in Regulation 401 KAR 59:016, Section 9(7).

12) Pursuant to Regulation 401 KAR 59:016, Section 9(8), for the purposes of the reports required under Regulation 401 KAR 59:005, Section 4, periods of excess emissions are defined as all six (6) minute periods during which the average opacity exceeds the applicable opacity standards as specified in Subsection 2 of this section. Opacity levels in excess of the applicable opacity standard and the date of such excesses are to be submitted to the division each calendar quarter.

13) The permittee shall report the number of excursions (excluding startup, shut down, malfunction data) above the opacity standard, date and time of excursions, opacity value of the excursions, and percentage of the COM data showing excursions above the opacity standard in each calender quarter.

SECTION B EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

7. Specific Control Equipment Operating Conditions:

a) The electrostatic precipitator (ESP), flue gas desulfurization unit (FGD), and the low NO_x burner shall be operated as necessary to maintain compliance with permitted emission limitations, in accordance with manufacturer's specifications and / or standard operating practices.

b) Records regarding the maintenance of the control equipments shall be maintained.

c) See Section E for further requirements.

expand on types of maintenance

SECTION B EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

b) Pursuant to Regulation 401 KAR 50:035, Section 7(1)(c), to meet the periodic monitoring requirement for particulate, the permittee shall use a continuous opacity monitor (COM). Excluding the startup, shut down, and once per hour exemption periods, if any six minute average opacity value exceeds the opacity standard, the permittee shall, as appropriate, initiate an inspection of the control equipment and/or the COM system and make any necessary repairs. If five (5) percent or greater of COM data (excluding startup, shut down, and malfunction periods, data averaged over six minute period) recorded in a calender quarter show excursions above the opacity standard, the permittee shall perform a stack test in the following calender quarter to demonstrate compliance with the particulate standard while operating at representative conditions. The permittee shall submit a compliance test protocol as required by condition Section G(a)(21) of this permit before conducting the test. The division may waive this testing requirement upon a demonstration that the cause(s) of the excursions have been corrected, or may require stack tests at any time pursuant to Regulation 401 KAR 50:045, Performance Tests.

c) Pursuant to Regulation 401 KAR 50:035, Section 7(1)(c), to meet the periodic monitoring requirement for opacity, the permittee shall use a continuous opacity monitor (COM). Excluding the startup, shut down, and once per hour exemption periods, if any six minute average opacity value exceeds to the opacity standard, the permittee shall, as appropriate, initiate an inspection of the control equipment and/or the COM system and make any necessary repairs. If visible emissions from the stack are perceived or believed to exceed the applicable standard, the permittee shall determine the opacity of emissions by Reference Method 9. If a Method 9 test cannot be performed, the reason for not performing the test shall be documented.

d) Pursuant to Regulation 401 KAR 50:035, Section 7(1)(c), to meet the periodic monitoring requirement for sulfur dioxide, the permittee shall use a continuous emission monitor (CEM). Excluding the startup and shut down periods, if any 3-hour average sulfur dioxide value exceeds that standard, the permittee shall, as appropriate, initiate an inspection of the control equipment and/or the CEM system and make any necessary repairs as soon as practicable.

e) Pursuant to Regulation 401 KAR 50:035, Section 7(1)(c), to meet the periodic monitoring requirement for nitrogen oxide, the permittee shall use a continuous emission monitor (CEM). Excluding the startup and shut down periods, if any 3-hour average nitrogen oxide value exceeds the standard, the permittee shall, as appropriate, initiate an investigation of the cause of the exceedance and/or the CEM system and make any necessary repairs or take any corrective actions as soon as practicable.

f) Pursuant to Regulation 401 KAR 59:016, Section 7(2), the permittee shall monitor sulfur dioxide emission using continuous monitoring system at both the inlet and outlet of the sulfur dioxide control device. An "as fired" fuel monitoring system meeting the requirements of Reference Method 19 may be used to determine potential sulfur dioxide emissions in place of a continuous emission monitor at the inlet of the sulfur dioxide control device.

One Energy Place
Pensacola, Florida 32520

850.444.6111

Jonathan Holtom

RECEIVED

JUL 30 1999

BUREAU OF AIR REGULATION

GULF POWER
A SOUTHERN COMPANY

Certified Mail

July 27, 1999

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

RE: Revised Title IV Phase II NOx Averaging Plan
Plant Crist: 0330045-001-AV (ORIS Code 641)
Plant Scholz: 0630014-001-AV (ORIS Code 642)
Plant Lansing Smith: 0050014-001-AV (ORIS Code 643)

Attached, please find an original Designed Representative approved copy of a revised Southern Company System Phase II NOx Averaging Plan. This plan is effective January 1, 2000. This revision is being submitted pursuant to a request from Ms. Jenny Jachim at EPA Region IV to eliminate any confusion about several recent editorial changes for Plant Arkwright at Georgia Power. This revision changes the Emission Limitation (column a, page 3) from 0.40 to 0.50 for Units 3 and 4 and sets the ACELs (column b, page 3) for all four Arkwright units at 0.70.

Please note that these changes are small and do not effect the bottom line Btu-weighted annual emission rate in the previously submitted plan. EPA has indicated that the filing date is not an issue and that if any of the states have a question or if you would like to discuss this matter with EPA to call Ms. Jachim at (404) 562-9126.

Please let me know if you have any questions or if further information is needed to revise the above referenced Title IV and V permits.

Sincerely,

G. Dwain Waters Q.E.P.

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

cc/watt: Doug Neeley, U.S. Environmental Protection Agency – Region IV
Danny Herrin, Southern Company Services
Robert G. Moore, Gulf Power Company
James O Vick, Gulf Power Company
Joe Martin, Gulf Power Company
John Dominey, Gulf Power Company
Kim Flowers Gulf Power Company
Ken Peacock, Gulf Power Company
Tracy Reeder, Gulf Power Company

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Expires 1-31-99

Phase II NO_x Averaging Plan

For more information, see instructions and refer to 40 CFR 76.11

Page 1

This submission is: ☐ New ☒ Revised

Page ☐ of ☐

STEP 1

Identify the units participating in this averaging plan by plant name, State, and boiler ID# from NADB. In column (a), fill in each unit's applicable emission limitation from 40 CFR 76.5, 76.6, or 76.7. In column (b), assign an alternative contemporaneous annual emissions limitation in lb/mmBtu to each unit. In column (c), assign an annual heat input limitation in mmBtu to each unit. Continue to page 3 if necessary.

Plant Name	State	ID#	(a) Emission Limitation	(b) Alt. Contemp. Emission Limitation	(c) Annual Heat Input Limit
See Page 3					

STEP 2

Use the formula to enter the Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan and the Btu-weighted annual average emission rate for the same units if they are operated in compliance with 40 CFR 76.5, 76.6, or 76.7. The former must be less than or equal to the latter.

Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan		Btu-weighted annual average emission rate for same units operated in compliance with 40 CFR 76.5, 76.6 or 76.7
0.46	≤	0.46

$$\frac{\sum_{i=1}^{n} (R_{Li} \times HI_i)}{\sum_{i=1}^{n} HI_i} \leq \frac{\sum_{i=1}^{n} [R_{1i} \times HI_i]}{\sum_{i=1}^{n} HI_i}$$

Where,

R_{Li} = Alternative contemporaneous annual emission limitation for unit i, in lb/mmBtu, as specified in column (b) of Step 1;

R_{1i} = Applicable emission limitation for unit i, in lb/mmBtu, as specified in column (a) of Step 1;

HI_i = Annual heat input for unit i, in mmBtu, as specified in column (c) of Step 1;

n = Number of units in the averaging plan

Southern Company Averaging Plan Participating Plants
Plant Name (from Step 1)

STEP 3

Mark one of the two options and enter dates.

☐ This plan is effective for calendar year _____ through calendar year _____ unless notification to terminate the plan is given.

☒ Treat this plan as 5 identical plans, each effective for one calendar year for the following calendar years: 2000, 2001, 2002, 2003 and 2004 unless notification to terminate one or more of these plans is given.

STEP 4

Read the special provisions and certification, enter the name of the designated representative, and sign and date.

Special Provisions

Emission Limitations

Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitation for NO_x under the plan only if the following requirements are met:

(i) For each unit, the unit's actual annual average emission rate for the calendar year, in lb/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and

(a) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,

(b) For each unit with an alternative contemporaneous emission limitation more stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, or

(ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with 40 CFR 76.11(d)(1)(ii)(A) and (B), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7.

(iii) If there is a successful group showing of compliance under 40 CFR 76.11(d)(1)(ii)(A) and (B) for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under (i).

Liability

The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.

Termination

The designated representative may submit a notification to terminate an approved averaging plan, in accordance with 40 CFR 72.40(d), no later than October 1 of the calendar year for which the plan is to be terminated.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Charles D. McCrary	
Signature Charles D. McCrary	Date 7-23-99

Southern Company Averaging Plan Participating Plants

Plant Name (from Step 1) **as Listed in Step 1.**

STEP 1
Continue the identification of units from Step 1, page 1, here.

Plant Name	State	ID #	(a) Emission Limitation	(b) Alt. Contemp. Emission Limitation	(c) Annual Heat Input Limit
Arkwright	GA	1	0.45	0.70	1,875,509
Arkwright	GA	2	0.45	0.70	1,886,089
Arkwright	GA	3	0.50	0.70	2,006,321
Arkwright	GA	4	0.50	0.70	1,932,669
Barry	AL	1	0.40	0.49	10,805,761
Barry	AL	2	0.40	0.49	10,643,159
Barry	AL	3	0.40	0.49	17,148,763
Barry	AL	4	0.40	0.37	25,471,720
Barry	AL	5	0.40	0.45	50,897,853
Bowen	GA	1	0.45	0.42	45,395,755
Bowen	GA	2	0.45	0.43	46,911,826
Bowen	GA	3	0.45	0.43	59,796,338
Bowen	GA	4	0.45	0.43	62,106,898
Branch	GA	1	0.68	0.99	14,906,580
Branch	GA	2	0.50	0.72	16,571,123
Branch	GA	3	0.68	0.84	27,015,768
Branch	GA	4	0.68	0.84	28,967,878
Crist	FL	4	0.45	0.52	3,062,929
Crist	FL	5	0.45	0.60	4,850,348
Crist	FL	6	0.50	0.45	17,603,755
Crist	FL	7	0.50	0.45	32,267,381
Daniel	MS	1	0.45	0.28	28,010,957
Daniel	MS	2	0.45	0.26	29,025,313
Gadsden	AL	1	0.45	0.65	2,473,380
Gadsden	AL	2	0.45	0.68	2,333,659
Gaston	AL	1	0.50	0.43	15,666,430
Gaston	AL	2	0.50	0.43	15,642,121
Gaston	AL	3	0.50	0.43	16,016,613
Gaston	AL	4	0.50	0.43	15,780,983
Gaston	AL	5	0.45	0.42	43,137,116
Gorgas	AL	6	0.46	0.86	5,058,595
Gorgas	AL	7	0.46	0.86	5,052,447
Gorgas	AL	8	0.40	0.49	11,173,785
Gorgas	AL	9	0.40	0.30	10,939,664
Gorgas	AL	10	0.40	0.76	46,251,622

Southern Company Averaging Plan Participating Plants

Plant Name (from Step 1) as Listed in Step 1.

STEP 1
Continue the identification of units from Step 1, page 1, here.

Plant Name	State	ID #	(a) Emission Limitation	(b) Alt. Contemp. Emission	(c) Annual Heat Input Limit
Greene Co	AL	1	0.68	0.98	19,524,675
Greene Co	AL	2	0.46	0.43	18,839,670
Hammond	GA	1	0.50	0.83	4,539,663
Hammond	GA	2	0.50	0.83	6,333,156
Hammond	GA	3	0.50	0.83	6,439,818
Hammond	GA	4	0.50	0.45	26,126,591
Kraft	GA	1	0.45	0.58	2,974,849
Kraft	GA	2	0.45	0.58	2,238,703
Kraft	GA	3	0.45	0.58	3,971,009
L. Smith	FL	1	0.40	0.62	9,199,644
L. Smith	FL	2	0.40	0.44	10,154,723
McDonough	GA	1	0.45	0.42	18,934,013
McDonough	GA	2	0.45	0.42	17,338,565
McIntosh	GA	1	0.50	0.86	8,568,975
Miller	AL	1	0.46	0.29	53,814,591
Miller	AL	2	0.46	0.29	52,772,559
Miller	AL	3	0.46	0.29	49,093,163
Miller	AL	4	0.46	0.29	55,722,252
Mitchell	GA	3	0.45	0.62	5,322,072
Scherer	GA	1	0.40	0.50	52,573,864
Scherer	GA	2	0.40	0.50	55,563,600
Scherer	GA	3	0.45	0.29	37,912,770
Scherer	GA	4	0.40	0.30	70,093,731
Scholz	FL	1	0.50	0.68	1,855,434
Scholz	FL	2	0.50	0.77	1,864,795
Wansley	GA	1	0.45	0.41	53,141,279
Wansley	GA	2	0.45	0.42	49,741,786
Watson	MS	4	0.50	0.50	17,100,575
Watson	MS	5	0.50	0.65	33,455,317
Yates	GA	1	0.45	0.48	3,853,527
Yates	GA	2	0.45	0.48	4,687,321
Yates	GA	3	0.45	0.48	3,981,916
Yates	GA	4	0.45	0.40	7,087,706
Yates	GA	5	0.45	0.40	5,186,897
Yates	GA	6	0.45	0.33	13,373,298
Yates	GA	7	0.45	0.30	14,601,869

July 22, 1999

4APT-ARB

Howard L. Rhodes, Director
Air Resources Management Division
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: EPA's Review of Proposed Title V Permit
Gulf Power Company
Crist Electric Generating Plant
Permit No. 033045-001-AV

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for Gulf Power Company - Crist Electric Generating Plant, which was posted on DEP's web site on June 8, 1999. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The basis of EPA's objection is that the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. § 70.6(a)(3)(i), and has inadequate provisions to address various Acid Rain program requirements.

Section 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

Pursuant to 40 C.F.R. § 70.8(c), this letter and its enclosure contain a detailed explanation of the objection issues and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70. The enclosure also contains general comments applicable to the permit.

If you have any questions or wish to discuss this further, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141. Should your staff need additional information they may contact Ms. Gracy R. Danois, Florida Title V Contact, at (404) 562-9119, or Ms. Angelia Souder-Blackwell, Associate Regional Counsel, at (404) 562-9527.

Sincerely,

/s/

Winston A. Smith
Director
Air, Pesticides & Toxics
Management Division

Enclosure

cc: Mr. Robert G. Moore
Gulf Power Company

Enclosure

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Gulf Power Company
Crist Electric Generating Plant
Permit no. 033045-001-AV

I. EPA Objection Issues

1. Periodic Monitoring: The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter limit for units 1-3. Condition A.15 of the permit only requires an annual test, which, according to conditions A.21, A.27, A.28, and A.29, may not even be required since this unit's primary fuel is natural gas (see Objection Issue 2). In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the particulate matter. The permit must require the source to conduct more frequent monitoring or a technical demonstration must be included in the statement of basis explaining why the State has chosen not to require any additional PM testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a test performed once a year.

ASP

2. Compliance Testing: The permit is not clear about the frequency of testing that the facility needs to follow for particulate matter (PM) and visible emissions (VE). Condition A.15 states that the source must conduct annual testing for PM and VE. However, conditions A.21, A.27, A.28, and A.29 establish that the facility will conduct testing once a year if fuel oil is burned for more than 400 hours, and no testing is required otherwise. The permit needs to be clear about which one of these conditions the facility must follow to demonstrate compliance with the PM and VE limits. The same comment applies to conditions B.17 and B.26, and C.17 and C.26. Additionally, the permit needs to include the regulatory basis for conditions A.15, B.17 and C.17.

clear
Reference To
ASP condition

[add Rule Cite]

Furthermore, EPA is concerned with the interaction of these conditions. The statement of basis indicates that the source will conduct annual testing for particulate matter for units 4-7. Therefore, we do not understand why the testing waivers are included for these units since they seem not to apply.

3. Appropriate Averaging Times: In order for the emissions standard for particulate matter contained in conditions A.7, B.7, and C.7 to be practicably enforceable, the appropriate averaging time must be specified in the permit. An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance.

Excess em. Reports

4. Periodic Monitoring: Conditions B.17 and C.17 of the permit require the source to conduct annual testing for particulate matter. The statement of basis for the permit states that this testing frequency "is justified by the low emission rate documented in previous emissions tests while firing coal" and that the "Department has determined that sources with emissions less than half of the effective standard shall test annually."

Excess em. opacity obs

While EPA has in the past accepted this approach as adequate periodic monitoring for particulate matter, it has done so only for uncontrolled natural gas and fuel oil fired units. The units addressed in conditions B.17 and C.17 use add-on control equipment to comply with the applicable particulate matter standard. In order to provide reasonable assurance of compliance, the results of an annual stack testing will have to be supplemented with additional monitoring. Furthermore, the results of an annual test alone would not constitute an adequate basis for the annual certification of compliance that the facility will have to submit for these units.

The most common approach to addressing periodic monitoring for particulate emission limits on units with add-on controls is to establish either an opacity or a control device parameter indicator range that would provide evidence of proper control device operation. The primary goal of such monitoring is to provide reasonable assurance of compliance, and one way of achieving this goal is to use opacity data or control device operating parameter data from previous successful compliance tests to identify a range of values that has corresponded to compliance in the past. Operating within the range of values identified in this manner would

provide assurance that the control device is operating properly and would serve as the basis for an annual compliance certification. Depending upon the margin of compliance during the tests used to establish the opacity or control device indicator range, going outside the range could represent either a period of time when an exceedance of the applicable standard is likely or it could represent a trigger for initiating corrective action to prevent an exceedance of the standard. In order to avoid any confusion regarding the consequences of going outside the indicator range, the permit must clearly state if doing so is evidence that a standard has been exceeded and must specify whether corrective action must be taken when a source operates outside the established indicator range.

5. Periodic Monitoring: Condition C.7 specifies that particulate matter emissions from unit 6 shall not exceed 1,475 tons per year. Based upon the short term limit for this unit [0.1 pound/million British thermal units (BTUs)], heat input capacity (3,704.8 BTU/hour), and 8,760 hours of operation per year, unit 6 could emit 1,622.7 ton/year of particulate matter even if it is continuously meeting the applicable short-term particulate limit. Since this value exceeds the annual emission limit of 1,475 ton/year, the permit must be revised to include conditions

Reformulated Daily

specifying the procedures that Gulf Power will use to demonstrate compliance with the annual particulate emission limit for unit 6.

6. Periodic Monitoring: Condition C.9 specifies that, when burning solid fuel, sulfur dioxide emissions from unit 6 shall not exceed 87,035 tons per year. Although Condition C.16 indicates that monitoring to assure compliance with this limit will be conducted with the SO_2 continuous emission monitor installed on unit 6, data from the flue gas flow rate monitor installed on this unit is needed in order to convert the data from the SO_2 monitor into an hourly mass emission rate that can be totaled in order to verify compliance with the annual SO_2 emission limit. Therefore, Condition C.16 must be revised to require that both the SO_2 and flue gas flow rate monitors be used to determine SO_2 emission rates on unit 6.

SO2 Monitor

7. Periodic Monitoring: Conditions D.7 and D.8 of the permit require that an annual Method 9 test be conducted for these units. In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the visible emissions standard. The permit must require the source to conduct visible emissions observations on a daily basis (Method 22), and that a Method 9 test be conducted within 24 hours of any abnormal qualitative survey. As an alternative to this approach, a

Submit Historic V.E. Tests

technical demonstration can be included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a short-term test performed once a year.

8. Acid Rain: Please note that the Phase II Averaging Plan submitted by the source is an enforceable part of this permit. The Averaging Plan, Phase II NO_x Compliance and Phase II Acid Rain Permit Application should be referenced and attached as enforceable parts of the Title V permit. We note that Phase II permit applications, Phase II NO_x Compliance Plans and the Phase II Averaging Plans submitted by this source are referenced in Section IV, Condition A.1.of the proposed permit and on page 1 of the permit in a section entitled, "Referenced attachments made part of this permit". However, the forms and the referenced dates of these two parts of the permit do not coincide and do not appear to reflect the complete signed forms as submitted by the source. It is important that the specific forms and applications (signed and dated by the designated representative) be attached to the permit as enforceable parts of the permit and that they are completely and accurately referenced.

Correct References

9. Acid Rain: The language contained in section 70.6(a)(1)(ii), regarding Acid Rain Program requirements in title V is not addressed in the Acid Rain Part of the permit and does not appear to be included in elsewhere in the body of the proposed permit. This condition needs to be added to the proposed title V permit for this source.

Bruce has 2 conditions to satisfy

II. General Comments

1. Section II, condition 1: Please make sure that Appendix TV-2 reflects the updated version of condition 51, as it is contained in Appendix TV-3.

Replace with TV-3

2. Section II, condition 12: Please correct the address, telephone and fax number for the Air Enforcement Section. All required reports should be sent to the Air Enforcement Section (AES), not the Operating Source Section. The correct telephone and fax numbers for AES are 404/562-9055 and 404/562-9163, respectively. Additionally, please delete the information concerning the submission of Acid Rain information. Region 4 does not have an Acid Rain Section.

3. Statement of Basis: The statement of basis indicates that each emission

unit is subject to a particulate matter emissions limit of 0.1 lb/MMBtu, and this limit is effectively equivalent to 0.149 lb/MMBtu due to rounding. This is also stated for conditions of soot blowing, where the particulate matter emission limit of 0.3 lb/MMBtu would be equivalent to 0.349 lb/MMBtu. However, these statements are incorrect. A measured emission rate of 0.149 lb/MMBtu actually rounds to 0.15 lb/MMBtu rather than 0.1 lb/MMBtu, which is in excess of the emission limit, and therefore not allowable.

Revised

0.149

According to the June 6, 1990 memorandum "Performance Test Calculation Guidelines", issued by William G. Laxton, Director of the Technical Support Division, OAQPS, and John S. Seitz, Director of the Stationary Source Compliance Division, OAQPS, when calculating and reporting emission rates and concentrations in determining compliance with the new source performance standards (NSPS) and national emission standards for hazardous pollutants (NESHAP), as well as state implementation plans (SIP's), all emission standards should be considered to have at least two significant figures (SF's), but no more than three. Therefore, since the 0.1 lb/MMBtu emission limit for particulate matter comes from the Florida state SIP, it should be considered to have two SF's. In this case, the emission limit effectively becomes 0.10 lb/MMBtu. In order to comply with the emission limit of 0.1 lb/MMBtu, the highest allowable measured emission rate (measured to four SF's) is 0.1049 lb/MMBtu. Please correct the statement of basis to reflect the above discussion.

4. Section IV, Acid Rain Part: Please note that the allowances allocated to the Crist Plant units 4,5,6,7, as indicated under Section IV, Condition A.2 of the proposed permit have ~~been changed~~. This revision was published in the Federal Register on September 28, 1998 (Vol. 63 No. 187, pp 51706-51765). We recommend that the allowances that are indicated for these units be adjusted to reflect the revised allocation.

Will change on Final

5. Appendix CP-1: Appendix CP-1, "Alternate Phase II NO_x Compliance Plan" of the proposed permit for the Gulf Power Company - Crist Plant requires that the designated representative of the Crist Plant provide certification that the NO_x averaging plan has been approved by all the other involved permitting authorities prior to Florida's approval of the plan. The procedure, as indicated in the "Appendix CP-1" of this proposed permit, does not appear to consider future revisions to a previously approved Phase II NO_x Averaging Plan. Each year of a plan, the permittee has the option of submitting a revision to an approved

only for

averaging plan by January 1 of the calendar year for which the averaging plan is to become effective. Condition 2 of "Appendix CP-1" specifically addresses the approval of the current Phase II Averaging Plan and does not discuss Florida's approval procedures for revisions to an Phase II NO_x Averaging Plan. Condition 3 of "Appendix CP-1" indicates that should the designated representative fail to submit the required certification under this Appendix then the source would be required to comply to the applicable Phase II NO_x emission limits specified in 40 CFR § 76.5. Please note that 40 CFR § 76.11(b)(3) indicates that when an averaging plan or a revision to an approved averaging plan is not approved, the owner or operator of each unit in the plan shall operate the unit in compliance with the emission limitation that would apply in the absence of an averaging plan or revision to a plan. Therefore, in the case where the permittee has an approved averaging plan but wishes to revise the plan, the approval of the revision is not final until all permitting authorities have approved the revision. Should the revision not be approved, then the permittee is required to comply with the originally approved (assuming it has been approved for multiple years) plan in absence of the revision. Appendix CP-1 should be revised to specify that the conditions contained in the appendix only apply to the particular averaging plan attached to this permit and does not prescribe procedures that should be followed for future revisions to the plan.

Region 4's concern regarding the Rule 62-214.330(3)(b) requiring the designated representatives of a source in a multi-agency Phase II Averaging Plan to certify that every other affected permitting authority has approved the plan prior to the State of Florida's approval was indicated in a letter sent to Mr. Howard Rhodes from Mr. Douglas Neeley on December 9, 1997. It was Region 4's understanding, at that time, that Florida's Rule 62-214.330 was scheduled to be revised to avoid conflicts (such as has been described above) with 40 CFR Part 76. Appendix CP-1 was prepared so that the approval process would not be delayed in the interim. Please provide Region 4 with a schedule indicating when the revision is to occur.

INTEROFFICE MEMORANDUM

Date: 16-Jul-1999 03:10pm
From: Danois.Gracy
Danois.Gracy@epamail.epa.gov
Dept:
Tel No:

To: holton_j (holton_j@dep.state.fl.us)
To: sheplak_s (sheplak_s@dep.state.fl.us)

Subject: Draft Comments - GPC, Crist Electric Generating Plant

Scott and Jonathan:

Attached are the draft comments on Crist. I couldn't get the peer review completed in time, but you'll get the official comments first thing Monday. Let me know if you think that we can avoid an objection on this one.

*****
Heads Up !

Scott: We also have comments on the permit for Perpetual Energy. We expect to be sending those sometime Wednesday, but day 45 is July 25, so we may have to issue another objection. I already gave a heads up to Rita Felton-Smith, NE District about the problems we saw with the permit (PSD being the biggest one).

Gracy

We cannot respond to comments on proposed

Rule Cite for EPA objs.

213.450

? G.P. How are you going to resolve EPA's objections

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR, PESTICIDES & TOXICS MANAGEMENT DIVISION
61 Forsyth St., S. W.
Atlanta, Georgia 30303
Fax Number: 404/562-9095

ELECTRONIC TRANSMISSION

Date: **July 16, 1999** ***DRAFT***DRAFT***

To: **Scott Sheplak, FDEP - Tallahassee**
Jonathan Holton, P.E., FDEP - Tallahassee

From: **Gracy R. Danois, EPA Region 4**

Subject: **Initial Comments on Proposed Title V Permit**
GPC - Crist Electric Generating Plant
Permit no. 033045-001-AV

Below are initial comments from EPA Region 4 on the above referenced source. Our comments are divided into two categories: 1) Significant Comments and 2) General Comments.
Significant comments are defined as those comments that would trigger an objection under
40 CFR Part 70. Given that EPA has several significant comments on this proposed permit, we would like to attempt resolution of all issues in order to avoid a formal objection on this permit. If resolution of our significant comments is not achieved, EPA Region 4 will issue an objection to the proposed permit pursuant to 40 CFR 70.8(c) on or before day-45 of the review period. For purposes of this permit review, day-45 is defined as **July 22, 1999.**

Another option available to you is withdrawal of the proposed permit from EPA review. If you choose to utilize this option, you must submit to EPA a written request that the permit be withdrawn including a statement that a proposed permit will be resubmitted for EPA review at a later date. Your written request to withdraw the proposed permit must be submitted to our office by no later than **July 22, 1999.**

1) Significant Comments

a. Periodic Monitoring: The permit does not require sufficient periodic monitoring to ensure compliance with the applicable particulate matter for units 1-3. Condition A.15 of the permit only requires an annual test, which may not even be required since this unit's primary fuel is natural gas (see Significant Comment b). In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the particulate matter. The permit must require the source to conduct more frequent testing or a technical demonstration must be included in the statement of basis explaining why the State has chosen not to require any additional PM testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a test performed once a year.

See ASP-97-B-01 as approved by EPA

b. Compliance Testing: The permit is not clear about the frequency of testing that the facility needs to follow for particulate matter (PM) and visible emissions (VE). Condition A.15 states that the source must conduct annual testing for PM and VE. However, conditions A.21, A.27, A.28, and A.29 establish that the facility will conduct testing once a year if fuel oil is burned for more than 400 hours, and no testing is required otherwise. The permit needs to be clear about which one of these conditions the facility must follow to demonstrate compliance with the PM and VE limits. The same comment applies to conditions B.17 and B.26, and C.17and C.26. Additionally, the permit need to include the regulatory basis for conditions A.15, B.17 and C.17.

Change A.15 to say: "Except as otherwise specified below, Units 1-3 must conduct Annual PM+VE Tests Same for B.17 & C.17. [Rule 62-213.440.FAC]

Furthermore, EPA is concerned with the interaction of these conditions. The statement of basis indicates that the source will conduct annual testing for particulate matter for units 4-7. Therefore, we do not understand why the testing waivers are included for these units since they seem not to apply.

The waiver does apply to 1-3, Not 4-7

c. Appropriate Averaging Times: In order for the emissions standard for particulate matter contained in conditions A.7, B.7, and C.7 to be practicably enforceable, the appropriate averaging time must be specified in the permit. An approach that can be used to address this deficiency is to include general language in the permit to indicate that the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance.

Any Standard Language yet?

Bruce-P. Note. *

d. Periodic Monitoring: Conditions B.17 and C.17 of the permit require the

source to conduct annual testing for particulate matter. The statement of basis for the permit states that this testing frequency "is justified by the low emission rate documented in previous emissions tests while firing coal", and that the "Department has determined that sources with emissions less than half of the effective standard shall test annually."

No Statutory authority to do otherwise?

While EPA has in the past accepted this approach as adequate periodic monitoring for particulate matter, it has done so for uncontrolled natural gas and fuel oil fired units. The units addressed in conditions B.17 and C.17 use add-on control equipment to comply with the applicable particulate matter standard. In order to provide reasonable assurance of compliance, the results of an annual stack testing will have to be supplemented with additional monitoring. Furthermore, the results of an annual test alone would not constitute an adequate basis for the annual certification of compliance that the facility will have to submit for these units.

correlate to "CMS"

GP?

e. Periodic Monitoring: Condition C.7 specifies that the particulate matter emissions from unit 6 shall not exceed 1,475 tons per year. However, the permit does not specify how compliance with this emission limit will be demonstrated. The permit needs to specify the procedures that the facility will use to demonstrate compliance with this limit on an annual basis.

how about SO_2 CEMs see P.N. after C.22

f. Periodic Monitoring: Condition C.9 specifies that, when burning solid fuel, sulfur dioxide emissions from unit 6 shall not exceed 87,035 tons per year. However, the permit does not specify how compliance with this emission limit will be demonstrated. Since SO_2 emissions from unit 6 can be calculated either based upon coal usage data and sulfur content or based upon the flue gas SO_2 concentration and flow rate, the permit needs to specify which, if either, of these methods will be used to calculate the results that will serve as basis for the annual compliance certification that the company must submit.

New P.M. Rule? Make up reqmts?

g. Periodic Monitoring: Conditions D.7 and D.8 of the permit require that an annual Method 9 test be conducted for these units. In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the visible emissions standard. The permit must require the source to conduct visible emissions observations on a daily basis (Method 22), and that a Method 9 test be conducted within 24 hours of any abnormal qualitative survey. As an alternative to this approach, a technical demonstration can be included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing. The demonstration needs to identify the rationale for

5 yrs of data on VE <5%

basing the compliance certification on data from a short-term test performed once a year.

h. Acid Rain: Please note that the Phase II Averaging Plan submitted by the source is an enforceable part of this permit. The Averaging Plan, Phase II NO_x Compliance and Phase II Acid Rain Permit Application should be referenced and attached as enforceable parts of the Title V permit. We note that Phase II permit applications, Phase II NO_x Compliance Plans and the Phase II Averaging Plans submitted by this source are referenced in Section IV, Condition A.1.of the proposed permit and on page 1 of the permit in a section entitled, "Referenced attachments made part of this permit". However, the forms and the referenced dates of these two parts of the permit do not coincide and do not appear to reflect the complete signed forms as submitted by the source. It is important that the specific forms and applications (signed and dated by the designated representative) be attached to the permit as enforceable parts of the permit and that they are completely and accurately referenced.

They are

Add more dates to 1st page & reflect latest submission in IV. A.1.

i. Acid Rain: The language contained in section 70.6(a)(1)(ii), regarding Acid Rain Program requirements in title V is not addressed in the Acid Rain Part of the permit and does not appear to be included in elsewhere in the body of the proposed permit. This condition needs to be added to the proposed title V permit for this source.

See Bruce For Language

j. Acid Rain: Appendix CP-1, "Alternate Phase II NO_x Compliance Plan" of the proposed permit for the Gulf Power Company - Crist Plant requires that the designated representative of the Crist Plant provide certification that the NO_x averaging plan has been approved by all the other involved permitting authorities prior to Florida's approval of the plan. The procedure as indicated in the "Appendix CP-1" of this proposed permit does not appear to consider future revisions to a previously approved Phase II NO_x Averaging Plan. Each year of a plan, the permittee has the option of submitting a revision to an approved averaging plan by January 1 of the calendar year for which the averaging plan is to become effective. Condition 2, of the "Appendix CP-1" specifically addresses the approval of the current Phase II Averaging Plan and does not discuss Florida's approval procedures for revisions to an Phase II NO_x Averaging Plan. Condition 3 of the "Appendix CP-1" indicates that should the designated representative fail to submit the required certification under this Appendix then the source would be required to comply to the applicable Phase II NO_x emission limits specified in 40 CFR § 76.5. Please note that 40 CFR § 76.11(b)(3) indicates that when an averaging plan or a revision to

This Comp Plan is only for initial. Subsequent changes should be handled by Phase II permit

May need to add clarifying condition in A.2

76.11(b)(1)

No 120 rights after EPA objection

can't make changes to a proposed w/o objection

if PO, New draft is required

an approved averaging plan is not approved, the owner or operator of each unit in the plan shall operate the unit in compliance with the emission limitation that would apply in the absence of an averaging plan or revision to a plan. Therefore, in the case where the permittee has an approved averaging plan but wishes to revise the plan, the approval of the revision is not final until all permitting authorities have approved the revision. Should the revision not be approved then the permittee is required to comply with the original approved (assuming it has been approved for multiple years) plan in absence of the revision.

According to Pat this revision would conflict with our Statute and will not be made. Warrant Final Rule yet.

Region 4's concern regarding the Rule 62-214.330(3)(b) requiring the designated representatives of a source in a multi-agency Phase II Averaging Plan to certify that every other affected permitting authority has approved the plan prior to the State of Florida's approval was indicated in a letter sent to Mr. Howard Rhodes from Mr. Douglas Neeley on December 9, 1997. It was Region 4's understanding, at that time, that Florida's Rule 62-214.330 was scheduled to be revised to avoid conflicts (such as has been described above) with the Federal Rule 40 CFR Part 76. Appendix CP-1 was prepared so that the approval process would not be delayed in the interim. Please provide Region 4 with a schedule indicating when the revision is to occur.

"when other states make this subject to challenge under APA"

2) General Comments

a. Section II, condition 1: Please make sure that Appendix TV-2 reflects the updated version of condition 51, as it is contained in Appendix TV-3.

TV-3 was not noticed in revised draft. will be included in next opening

b. Section II, condition 12: Please correct the address, telephone and fax number for the Air Enforcement Section. All required reports should be sent to the Air Enforcement Section (AES), not the Operating Source Section. The correct telephone and fax numbers for AES are 404/562-9055 and 404/562-9163, respectively. Additionally, please delete the information concerning the submission of Acid Rain information. Region 4 does not have an Acid Rain Section.

?

Clair ?

c. Statement of Basis: The statement of basis indicates that each emission unit is subject to a particulate matter emissions limit of 0.1 lb/MMBtu, and this limit is effectively equivalent to 0.149 lb/MMBtu due to rounding. This is also stated for conditions of soot blowing, where the particulate

matter emission limit of 0.3 lb/MMBtu would be equivalent to 0.349 lb/MMBtu. However, these statements are incorrect. A measured emission rate of 0.149 lb/MMBtu actually rounds to 0.15 lb/MMBtu rather than 0.1 lb/MMBtu, which is in excess of the emission limit, and therefore not allowable.

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d. Section IV, Acid Rain Part: Please note that the allowances allocated to the Crist Plant units 4,5,6,7, as indicated under Section IV, Condition A.2 of the proposed permit have been changed. This revision was published in the Federal Register on September 28, 1998 (Vol. 63 No. 187, pp 51706-51765). We recommend that the allowances that are indicated for these units be adjusted to reflect the revised allocation.

RFC-822-headers:
Delivery-receipt-to: Danois.Gracy@epamail.epa.gov
Read-receipt-to: Danois.Gracy@epamail.epa.gov
Received: from epic50.dep.state.fl.us ([199.73.180.33])
 by mail.epic1.dep.state.fl.us (PMDF V5.2-32 #37980)
 with ESMTP id <01JDWJ6WHJH49BVFJU@mail.epic1.dep.state.fl.us> for
 SHEPLAK_S@a1.epic1.dep.state.fl.us (ORCPT rfc822;sheplak_s@dep.state.fl.us)
 ; Fri, 23 Jul 1999 12:10:35 EDT
Received: from merlin.rtpnc.epa.gov ([134.67.208.148])
 by mail.epic50.dep.state.fl.us (PMDF V5.2-32 #31508)
 with ESMTP id <01JDWJ7Y3U06001BHX@mail.epic50.dep.state.fl.us> for
 SHEPLAK_S@a1.epic1.dep.state.fl.us (ORCPT rfc822;sheplak_s@dep.state.fl.us)
 ; Fri, 23 Jul 1999 12:11:38 -0400 (EDT)
Received: from myrtle.rtpnc.epa.gov by epamail.epa.gov (PMDF V5.1-12 #26439)
 with ESMTP id <0FFB00NQTZ0UBT@epamail.epa.gov>; Fri,
 23 Jul 1999 12:00:34 -0400 (EDT)
Received: from ccmail.epamail.epa.gov by epamail.epa.gov (PMDF V5.1-12 #26438)
 id <0FFB00M01YXXVW@epamail.epa.gov>; Fri, 23 Jul 1999 11:56:22 -0400 (EDT)

INTEROFFICE MEMORANDUM

Date: 23-Jul-1999 12:13pm
From: Danois.Gracy
Danois.Gracy@epamail.epa.gov
Dept:
Tel No:

Subject: Objection Letter: GPC - Crist Electric Generating Plant

The objection letter is attached. The letter was faxed to Howard yesterday around 5:00 p.m.

Gracy

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 23-Jul-1999 12:46pm
From: Scott Sheplak TAL
SHEPLAK_S
Dept: Air Resources Management
Tel No: 850/488-1344

To: Jonathan Holtom TAL (HOLTOM_J)
CC: danois gracy (danois.gracy@epamail.epa.gov@in)

Subject: FWD: Objection Letter: GPC - Crist Electric Generating Plant

fyi

Thank you Gracy ... I think.

Jonathan

RECEIVED

JUN 01 1999

BUREAU OF
AIR REGULATION

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

Gulf Power Company
One Energy Place
Pensacola, FL 32520

OGC No. 97-1824

DRAFT Permit No.: 0330045-001-AV
Crist Plant
Escambia County

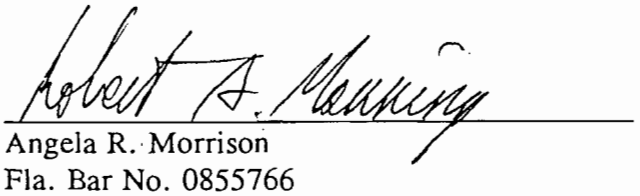
/

NOTICE OF WITHDRAWAL OF EXTENSION OF TIME

Gulf Power Company (Gulf), by and through undersigned counsel, hereby withdraws its Request for Extension of Time to file a petition for formal administrative proceedings in accordance with Chapter 120, Florida Statutes in the above-referenced matter. The Department granted Gulf's Request for last Extension of Time until June 1, 1999, which Gulf filed in response to the "Intent to Issue Revised Title V Air Operation Permit" (Permit No. 00330045-001-AV) for the Crist Plant located in Escambia County, Florida, to negotiate certain changes in the revised draft Title V Air Permit with the Department of Environmental Protection (Department). Based on comments submitted by Gulf, and subsequent discussions between Gulf and the Department, agreement has been reached on the issues involved in the above-referenced permit. The agreement between Gulf and the Department is reflected in the attached documents, which include a preliminary Proposed Title V permit. Accordingly, Gulf hereby withdraws its Request for Extension of Time, conditioned upon the Department's issuance of the Proposed Permit in accordance with the Department's agreement with Gulf.

Respectfully submitted this 28th day of May, 1999.

HOPPING GREEN SAMS & SMITH, P.A.



Angela R. Morrison
Fla. Bar No. 0855766
Robert A. Manning
Fla. Bar No. 0035173
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(904) 222-7500

Attorney for GULF POWER COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S. Mail on this 28th day of May, 1999:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Robert A. Manning
Attorney

INTEROFFICE MEMORANDUM

Date: 28-Apr-1999 04:39pm
From: Waters, Glenn D.
GDWATERS@southernco.com@PMDF@EPIC66
Dept:
Tel No:

Subject: Crist Title V Issues

Jonathan,

Phillips, Scott

Just wanted to touch base with you in regards to the issues discussed in our last face to face meeting. The three items that Gulf Power was to respond to were:

* You should have a copy of the fuel and load capabilities memo sent last week to Scott. I'm sure you'll note that Crist 4 & 5 doesn't have full load capability on oil after all. To my surprise, the plant decided not to pursue the full load issue on oil because the burners on the upper levels were all manual oil guns (one for each burner) and they now believe they would never want to go to full load on oil. Therefore, oil for startup/shutdown and flame stabilization only. Gas, was correct on all units as previously requested.

surprise, surprise!

* Gulf will not request a change in the Crist Unit 6 construction permit to delete the 87,000 tons/yr SO2 limit. We'll wait until the next renewal if we do address it. It isn't worth $250 to notice the amount. It somewhat defeats the need to have it deleted if you have to notice the number revision in the newspaper.

ok.

* Scott also should have received the revised System NOx Average Plan. The only changes were the addition of the 4 small Georgia Power units.

ok.

After you make the necessary changes and add the Periodic Monitoring language, please send me a new final draft before we notice. Thanks, I think we are finally here on this one.

INTEROFFICE MEMORANDUM

Date: 28-Apr-1999 04:39pm
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After you make the necessary changes and add the Periodic Monitoring language, please send me a new final draft before we notice. Thanks, I think we are finally here on this one.

1. Calibration of CEMS.
2. Calibration Drift (CD) determination and adjustment of CEMS.
3. Preventative 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.

[Rules 62-213.440, 62-204.800(7)(e)5., and 62-296.405(1)(f)1.b., F.A.C.; and, Permits AC17-234016 and AO17-171806.]

C.25. Continuous Monitor Performance Specifications. If continuous monitoring systems are required by rule or are elected by the permittee to be used for demonstrating compliance with the standards of the Department, they must be installed, maintained and calibrated in accordance with the EPA performance specifications listed below. These Performance Specifications are contained in 40 CFR 60, Appendix B, and are adopted by reference in Rule 62-204.800, F.A.C.

(1) Performance Specification 1--Specifications and Test Procedures for Opacity Continuous Emission Monitoring Systems in Stationary Sources.
(2) Performance Specification 2--Specifications and Test Procedures for SO_2 Continuous Emission Monitoring Systems in Stationary Sources.
(3) Performance Specification 3--Specifications and Test Procedures for CO_2 Continuous Emission Monitoring Systems in Stationary Sources.

[Rule 62-297.520, F.A.C.]

C.26. Fuel Sampling and Analysis. The following fuel sampling and analysis protocol shall be used as an alternate sampling procedure authorized by permit to demonstrate compliance with the sulfur dioxide standard in the event that the SO_2 continuous emissions monitor is not able to capture valid data:

a. Determine and record the as-fired fuel sulfur content, percent by weight, for liquid fuels using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition, to analyze a representative sample of the blended fuel following each fuel delivery.
b. Determine and record the as-fired fuel sulfur content, percent by weight, for coal using ASTM D2013-72 and either ASTM D3177-75 or ASTM D4239-85, or the latest edition, to analyze a representative sample of the blended as-fired pulverized coal.
c. Determine and record the density (using ASTM D 1298-80, or equivalent) and the calorific heat value in Btu per pound (using ASTM D 240-76, or the latest edition) of the fuel oil combusted.
d. Determine and record the calorific heat value in Btu per pound of the blended, as-fired pulverized coal using ASTM D2013-72 and either ASTM D2015-77 or D3286-(latest version), or the latest edition.
e. Record daily the amount of each fuel fired, the density of the fuel oil, the heating value of each fuel fired, and the percent sulfur content, by weight, of each fuel fired.
f. Utilize the information in a., b., c., d. and e., above, to calculate the SO_2 emission rate to ensure compliance at all times.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

C.27. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

Jonathan Holtom

One Energy Place
Pensacola, Florida 32520

850.444.6111

GULF POWER
A SOUTHERN COMPANY

RECEIVED
APR 23 1999
BUREAU OF
AIR REGULATION

April 22, 1999

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Dear Mr. Sheplak:

RE: Crist Electric Generating Plant
FDEP Draft Permit No: 0330045-001-AV

Attached, please find Gulf Power's certification of "able to accommodate" fuels for Plant Crist as requested in our Crist Title V meeting dated April 13, 1999. Please incorporate these operating scenarios into the Plant Crist Title V draft permit.

If you have any questions, please call me at (850) 444-6527.

Sincerely,

Dwain Waters Q.E.P.

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

cc: Robert G. Moore, Gulf Power Company
James O Vick, Gulf Power Company
J. W. Martin, Gulf Power Company
John Dominey, Gulf Power Company

The following is a list of load capabilities and heat input values for "able to accommodate" fuels for units operated by Gulf Power Company at the Crist Electric Generating Facility:

Plant Crist Unit 1:	Full Load #2 Oil (320 MBTU/hr)
	Full Load #6 Oil (320 MBTU/hr)
	Full Load Natural Gas (420 MBTU/hr)
Plant Crist Unit 2:	Full Load #2 Oil (320 MBTU/hr)
	Full Load #6 Oil (320 MBTU/hr)
	Full Load Natural Gas (420 MBTU/hr)
Plant Crist Unit 3	Full Load #2 Oil (550 MBTU/hr)
	Full Load #6 Oil (550 MBTU/hr)
	Full Load Natural Gas (550 MBTU/hr)
Plant Crist Unit 4:	Startup/Shutdown, Flame Stabilization on #2 Oil (177 MBTU/hr)
	Full Load Coal (1075 MBTU/hr)
	Full Load Natural Gas (1075 MBTU/hr)
Plant Crist Unit 5:	Startup/Shutdown, Flame Stabilization on #2 Oil (177 MBTU/hr)
	Full Load Coal (1075 MBTU/hr)
	Full Load Natural Gas (1075 MBTU/hr)
Plant Crist Unit 6:	Startup/Shutdown, Flame Stabilization on #2 Oil (714 MBTU/hr)
	Full Load Coal (3705 MBTU/hr)
	Full Load Natural Gas (3705 MBTU/hr)
Plant Crist Unit 7:	Startup/Shutdown, Flame Stabilization on #2 Oil (1282 MBTU/hr)
	Full Load Coal (6406 MBTU/hr)
	Full Load Natural Gas (6406 MBTU/hr)

CERTIFIED BY:

Gregory N. Terry, P. E.

52786
P. E. Registration Number

4/22/1999
Date

Robert M. Moore
Responsible Official

4/22/99
Date

GULF POWER COMPANY

ONE ENERGY PLACE
PENSACOLA, FLORIDA 32520-0328

To: Jonathan Holton

Company: FDEP

Phone:

Fax: (850) 922-6979

From: Duane Waters

Company: Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Phone: (850) 444-6527

Fax: 850.444.6217

Date: April 21, 1999

Pages including this cover page: 6

Comments: Re: Southern System NOx Alg. Plan

* The original to Scott Sheplak will be mailed tomorrow. Here is an advance copy of the revised System NOx Alg. Plan.

Please note that we have a new address and a new area code (see above). Appreciate you updating your address list concerning our company.

Internal Correspondence

SOUTHERN COMPANY
Energy to Serve Your World℠

DATE: April 17, 1999

FROM: Ken Boyd KWB

RE: System NOx Averaging Plan

TO: Anthony Marino, Phil Glisson, Dwain Waters, Pat Hedden, Lamar Keller

I have enclosed an original of the revised system NOx Averaging Plan signed by Mr. McCrary. (Two copies for Alabama Power.) This revision adds Plant Arkwright Units 1 through 4 to the averaging plan. These units were scheduled to burn gas when the original plan was signed and submitted but now are likely to burn primarily coal.

Because the averaging plan is large and Plant Arkwright is small, no changes to the NOx rates were necessary for other units in the plan. Therefore, according to Mr. Bob Miller, EPA Headquarters, Phase II NOx Group, all other plants with issued permits will require only an administrative permit amendment to replace the current averaging plan pages with the plan that includes Arkwright. Guidance is likely to be developed and issued by about the end of this month to address this type plan change.

At this point, according to Mr. Miller, EPA has no problem with us providing the revised plan to the states. Copies of your submittals should be provided to Region 4. We plan to send a copy to Mr. Miller.

If you have questions or comments please let me know.

Enclosure

cc: Danny Herrin

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Expires 1-31-99

Phase II NO_x Averaging Plan

For more information, see instructions and refer to 40 CFR 76.11

Page 1

This submission is: ☐ New ☒ Revised

Page ☐ of ☐

STEP 1

Identify the units participating in this averaging plan by plant name, State, and boiler ID# from NADB. In column (a), fill in each unit's applicable emission limitation from 40 CFR 76.5, 76.6, or 76.7. In column (b), assign an alternative contemporaneous annual emissions limitation in lb/mmBtu to each unit. In column (c), assign an annual heat input limitation in mmBtu to each unit. Continue to page 3 if necessary.

Plant Name	State	ID#	(a) Emission Limitation	(b) Alt. Contemp. Emission Limitation	(c) Annual Heat Input Limit
See Page 3					

STEP 2

Use the formula to enter the Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan and the Btu-weighted annual average emission rate for the same units if they are operated in compliance with 40 CFR 76.5, 76.6, or 76.7. The former must be less than or equal to the latter.

Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan		Btu-weighted annual average emission rate for same units operated in compliance with 40 CFR 76.5, 76.6 or 76.7
0.46	≤	0.46

$$\frac{\sum_{i=1}^{n} (R_{Li} \times HI_i)}{\sum_{i=1}^{n} HI_i} \leq \frac{\sum_{i=1}^{n} [R_{1i} \times HI_i]}{\sum_{i=1}^{n} HI_i}$$

Where,

R_{Li} = Alternative contemporaneous annual emission limitation for unit i, in lb/mmBtu, as specified in column (b) of Step 1;

R_{1i} = Applicable emission limitation for unit i, in lb/mmBtu, as specified in column (a) of Step 1;

HI_i = Annual heat input for unit i, in mmBtu, as specified in column (c) of Step 1;

n = Number of units in the averaging plan

Southern Company Averaging Plan Participating Plants

Plant Name (from Step 1)

STEP 3

Mark one of the two options and enter dates.

☐ This plan is effective for calendar year _____ through calendar year _____ unless notification to terminate the plan is given.

☒ Treat this plan as [5] identical plans, each effective for one calendar year for the following calendar years: 2000 2001 2002 2003 and 2004 unless notification to terminate one or more of these plans is given.

STEP 4

Read the special provisions and certification, enter the name of the designated representative, and sign and date.

Special Provisions

Emission Limitations

Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitation for NO_x under the plan only if the following requirements are met:

(i) For each unit, the unit's actual annual average emission rate for the calendar year, in lb/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and

(a) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,

(b) For each unit with an alternative contemporaneous emission limitation more stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, or

(ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with 40 CFR 76.11(d)(1)(ii)(A) and (B), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7.

(iii) If there is a successful group showing of compliance under 40 CFR 76.11(d)(1)(ii)(A) and (B) for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under (i).

Liability

The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.

Termination

The designated representative may submit a notification to terminate an approved averaging plan, in accordance with 40 CFR 72.40(d), no later than October 1 of the calendar year for which the plan is to be terminated.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Charles D. McCrary	
Signature Charles D. McCrary	Date 4-15-99

Southern Company Averaging Plan Participating Plants

Plant Name (from Step 1) as Listed in Step 1.

NO_x Averaging - Page 3

STEP 1
Continue the identification of units from Step 1, page 1, here.

Plant Name	State	ID #	(a) Emission Limitation	(b) Alt. Contemp. Emission Limitation	(c) Annual Heat Input Limit
Arkwright	GA	1	0.45	0.69	1,875,509
Arkwright	GA	2	0.45	0.70	1,886,089
Arkwright	GA	3	0.40	0.71	2,006,321
Arkwright	GA	4	0.40	0.75	1,932,669
Barry	AL	1	0.40	0.49	10,805,761
Barry	AL	2	0.40	0.49	10,643,159
Barry	AL	3	0.40	0.49	17,148,763
Barry	AL	4	0.40	0.37	25,471,720
Barry	AL	5	0.40	0.45	50,897,853
Bowen	GA	1	0.45	0.42	45,395,755
Bowen	GA	2	0.45	0.43	46,911,826
Bowen	GA	3	0.45	0.43	59,796,338
Bowen	GA	4	0.45	0.43	62,106,898
Branch	GA	1	0.68	0.99	14,906,580
Branch	GA	2	0.50	0.72	16,571,123
Branch	GA	3	0.68	0.84	27,015,768
Branch	GA	4	0.68	0.84	28,967,878
Crist	FL	4	0.45	0.52	3,062,929
Crist	FL	5	0.45	0.60	4,850,348
Crist	FL	6	0.60	0.45	17,603,755
Crist	FL	7	0.50	0.45	32,267,381
Daniel	MS	1	0.45	0.28	28,010,957
Daniel	MS	2	0.45	0.26	29,025,313
Gadsden	AL	1	0.45	0.65	2,473,380
Gadsden	AL	2	0.45	0.68	2,339,659
Gaston	AL	1	0.50	0.43	15,666,430
Gaston	AL	2	0.50	0.43	15,642,121
Gaston	AL	3	0.50	0.43	16,016,613
Gaston	AL	4	0.50	0.43	15,780,983
Gaston	AL	5	0.45	0.42	43,137,116
Gorgas	AL	6	0.46	0.86	5,058,595
Gorgas	AL	7	0.46	0.86	5,052,447
Gorgas	AL	8	0.40	0.49	11,173,785
Gorgas	AL	9	0.40	0.30	10,939,684
Gorgas	AL	10	0.40	0.76	46,251,622

Southern Company Averaging Plan Participating Plants

Plant Name (from Step 1) as Listed in Step 1.

NO_x Averaging - Page 4

STEP 1
Continue the identification of units from Step 1, page 1, here.

Plant Name	State	ID #	(a) Emission Limitation	(b) Alt. Contemp. Emission	(c) Annual Heat Input Limit
Greene Co	AL	1	0.68	0.98	19,524,675
Greene Co	AL	2	0.46	0.43	16,839,670
Hammond	GA	1	0.50	0.83	4,539,663
Hammond	GA	2	0.50	0.83	6,333,156
Hammond	GA	3	0.50	0.83	6,439,818
Hammond	GA	4	0.50	0.45	26,126,591
Kraft	GA	1	0.45	0.58	2,974,849
Kraft	GA	2	0.45	0.58	2,238,703
Kraft	GA	3	0.45	0.58	3,971,009
L. Smith	FL	1	0.40	0.62	9,199,644
L. Smith	FL	2	0.40	0.44	10,154,723
McDonough	GA	1	0.45	0.42	18,934,013
McDonough	GA	2	0.45	0.42	17,338,565
McIntosh	GA	1	0.50	0.86	8,568,975
Miller	AL	1	0.46	0.29	53,814,591
Miller	AL	2	0.46	0.29	52,772,559
Miller	AL	3	0.46	0.29	49,093,163
Miller	AL	4	0.46	0.29	55,722,252
Mitchell	GA	3	0.45	0.62	5,322,072
Scherer	GA	1	0.40	0.50	52,573,864
Scherer	GA	2	0.40	0.50	55,563,600
Scherer	GA	3	0.45	0.29	37,912,770
Scherer	GA	4	0.40	0.30	70,093,731
Scholz	FL	1	0.50	0.68	1,855,434
Scholz	FL	2	0.50	0.77	1,864,795
Wansley	GA	1	0.45	0.41	53,141,279
Wansley	GA	2	0.45	0.42	49,741,786
Watson	MS	4	0.50	0.50	17,100,575
Watson	MS	5	0.50	0.65	33,455,317
Yates	GA	1	0.45	0.48	3,853,527
Yates	GA	2	0.45	0.48	4,687,321
Yates	GA	3	0.45	0.48	3,981,916
Yates	GA	4	0.45	0.40	7,087,706
Yates	GA	5	0.45	0.40	5,186,897
Yates	GA	6	0.45	0.33	13,373,298
Yates	GA	7	0.45	0.30	14,601,869

Florida Department of Environmental Protection

Meeting Sign-In Sheet

Re: Gulf Power

Date: Apr. 13, 1999

Name	Representing	Telephone
Scott Sheplak	DEP	850/921-9532
Jonathan Holtom	DEP	921-9531
Cleve Holladay	DEP	921-8986
Angela Morrison	Gulf Power / HGSS	850-425-2258
Dwain Waters	Gulf Power	850-444-6627
Clair Fancy	DEP	921-9523
Pat Comer	DEP	921-9621
Bruce Mitchell	DEP / DARM / BAR / Title V	850/921-9506

S.C. 695-8369

4/13/99 Meeting w/ Gulf Power
D. Waters & Angela Morrison
Scott, Bruce, Clem, Clair, Pat, Jonathan

- Finalize T5 Permits for Crist
- General Discussion for Smith & Scholz

Comments a Crist
1 want P.N. to explain/defeat "detailed" or change per Clair
2 Port 75 Changes, Tiger Team → Mike Harkey
want clarification of "Delivery"
* Change to Daily Sampling & Analysis in all units
3 ok
4 ok
5 change "Continuous" to "Daily" for units 1, 2, 3
6 ok
7 Units 1, 2, & 3 mentioned in Rule
4, 5, & 7 Statement of capability for oil (#2 only)
R.O. & P.E. Cert.
- GAM-60
currently using 4 & 5
during 3rd run of soot blowing test informed FDEP morning of test
every 2 weeks
Add testing Requirements

8 compl by CEMS Requires Re-Notice

9 ok

10. B.24. (b) delete missing Data -- & Record keeping...
(middle 2 sentences)
Link to other condition for redundant CEMs

11 ?

12 ?

13 ok

14 ok

15 "received" by December 1, 1999

Renotice after

Periodic Monitoring for Crist
CEMS is Compl. Method for opacity - 6 min Avg.
SO_2 Cems 24 hr Avg.
NOx 30 day rolling avg
PM.

Claire Notes from April 13 meeting.

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 0330045-001-AV

I. Public Notice.

An "INTENT TO ISSUE REVISED TITLE V AIR OPERATION PERMIT" to Gulf Power Company for the Crist Electric Generating Plant, located on Pate Road, off of 10 Mile Road on Governors Bayou, Escambia County, North of Pensacola County, was clerked on October 8, 1998. This revised DRAFT permit replaced the DRAFT permit that was issued on September 30, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE REVISED TITLE V AIR OPERATION PERMIT" was published in the Pensacola News Journal on November 5, 1998. The revised DRAFT Title V Air Operation Permit was available for public inspection at the Northwest District office in Pensacola and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received.

II. Public Comment(s).

Comments were received from one respondent during the 30 (thirty)-day public comment period. The comments were not considered significant enough to reissue the revised DRAFT Title V Permit and require another Public Notice, therefore, the revised DRAFT Title V Operation Permit was changed. These comments were addressed and a "draft" response was sent by E-mail to Gulf Power on April XX, 1999. Listed below is each comment that was received and a corresponding response.

A. E-mail from Mr. G. Dwain Waters dated December 15, 1998, and received on December 18, 1998.

SECTION III. Emissions Units and Conditions

1. Gulf Power December 15, 1998 Comment:

A.4., B.4., C.4. Hours of Operation. Requires Units 1-2-3 to maintain an daily operations log available for Department inspection that documents the total hours of annual operation, including a detailed account of hours operated on each of the allowable fuels. 62-213.440 and 62-210.200(PTE).

Comment: ~~Unit(s) should~~ not be required to have a continuous log of operations. Requirement does not note if this is a daily, hourly, monthly or annual log. Compliance to applicable standards are through vendor fuel oil analysis or generally exempt ~~from annual~~ visible emissions and particulate testing by operating less than 400 hour per year ~~on fuel oil~~. The current reporting under the AOR is all that should be required.

Please add a Permit Note to restate the following **FDEP November 14, 1997 Response:**
Rule 62-213.440, F.A.C., requires Title V permits to include "...operational requirements and limitations that assure compliance with all applicable requirements,...". Without the log book documentation, an annual claim on the AOR is not easily supportable and would not meet the requirements of Rule 62-213.440, F.A.C. A specification to daily, hourly, monthly, etc. is not needed as a detailed account of all fuels used is not time specific.

DEP Response 1:

If a log book is not maintained, a claim of operating less than 400 hours per year could not be substantiated. Additionally, without the log book documentation, an annual claim on the Annual Operating Report is not easily supportable and would not meet the requirements of Rule 62-213.440, F.A.C. The last sentence that you referred to in your comment should have read "A specification to daily, hourly, monthly, etc. is not needed in the permit condition, as a detailed account of all fuels used is not time specific." The requirement is to maintain a record of all fuels used, when they are used. If no fuel is used, no entry in the log is required.

No change will be made.

2. Gulf Power December 15, 1998 Comment:

A.14., ~~B.14.~~, ~~C.14~~. Sulfur Dioxide. Requires fuel analysis for each fuel delivery. Please change to each fuel shipment. Each delivery could require each truck to be sampled and analyzed. Fuel is usually sampled per shipment for payment purposes. daily sampling & analysis
Also, correct A.20. for reference to each fuel delivery.

DEP Response 2:

Condition A.14. states (in part) "....Compliance with the liquid fuel sulfur limit will be verified by a fuel analysis provided by the vendor upon each fuel oil delivery....". This condition provides a less burdensome method of compliance that is acceptable to the Department. The Vendor must follow acceptable testing procedures in order for this method of compliance to be valid. It is ultimately the permittee's responsibility to be able to demonstrate compliance with all permit terms and conditions. If the vendor can not supply an analysis with each fuel oil delivery, then it is the permittee's responsibility to have the delivery sampled.

No change will be made.

3. Gulf Power December 15, 1998 Comment:

A.15., B.17., C.17., C.32. Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)
Comment: It is unclear if this requirement applies only to the demonstration period of compliance. It should be noted that heat input (MMBtu/hr) for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/MMBtu) can be determined by the F-factor method as outlined in A.19. during this test. SO_2 process variables are determined by vendor fuel analysis. Please note item is listed under C.17. and C.32.

OK

Please add the following paragraphs from the Crist Statement of Basis and the Ft. Worth Title V permit as a Permit Note under A.15., B.17., and C.17.

The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for the purposes of confirming that the emissions testing is conducted within 90 to 100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emissions limits and to aid in determining future rule applicability. A note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required to demonstrate at what percentage of the rated capacity that the emissions unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires

measurement of process variables for emissions tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

Additionally, Gulf Power requests the following language be added similar to Ft. Worth Final Permit No.: 0990045-002-AV:

The permittee and the Department agree that the CEMS used for the federal Acid Rain Program conservatively overestimates the heat input for this unit. The monitoring data for heat input is therefore not appropriate for purposes of compliance, including annual compliance certification.

DEP Response 3:

The Department has agreed that the above referenced conditions (A.15., B.17., C.17. & C.32.) apply only during compliance testing. Conditions A.15. and B.17. will be moved to the "Test Methods and Procedures" section. Conditions C.17. and C.32. are duplicates, C.17. will be removed and the subsequent conditions will be renumbered accordingly.

The Department also agrees to replace the permitting note following the capacity conditions (A.1., B.1. & C.1.) with the following:

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required, in order to demonstrate what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.}

Additionally, the Department is agreeable to the last portion of this comment. The following permitting note will be added after the conditions entitled "Determination of Process Variables":

{Permitting Note: The permittee and the Department agree that the CEMS used for the federal Acid Rain Program conservatively overestimates the heat input for this unit. The monitoring data for heat input is therefore not appropriate for purposes of compliance, including annual compliance certification.}

4. Gulf Power October 28, 1997 Comment:

A.15., B.17., C.17., C.32. **Determination of Process Variables** **(b)** **Accuracy of Equipment.** Requires equipment and instruments noted in (a) above to be operated, 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) Please note that this item is also listed under C.17. and C.32.

OK

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO_2 compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing. Gulf Power requests the following be added as a permit note:

This requirement applies to equipment used during compliance testing. Equipment used for SO_2 compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period.

DEP Response 4:

This condition is part of the condition discussed in comment 3. The Department does not feel that the requested permitting note is pertinent, therefore, no changes will be made other than those outlined in response 3, above.

5. Gulf Power December 15, 1998 Comment:

daily

A.30., ~~B.31.~~, ~~C.33.~~ Recordkeeping and Reporting Requirements. Requires owner or operator to maintain ~~continuous~~ records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. Rule 62-214.440 and 62-4.070(3), F.A.C.

Comments: Unit(s) should not be required to maintain continuous records of fuel consumption if the unit accepts a percent sulfur restriction for sulfur dioxide compliance for liquid fuels or burns gas. Liquid fuel is monitored by as-received vendor fuel analysis. See condition A.20. Only annual reporting under the Annual Operating Report should be required.

Please add the Permit Note requested under A.4., B.4., C.4. under A.30., B.31., C.33., i.e.

Rule 62-213.440, F.A.C. requires Title V permits to include "...operational requirements and limitations that assure compliance with all applicable requirements,...". Without the log book documentation, an annual claim on the AOR is not easily supportable and would not meet the requirements of Rule 62-213.440, F.A.C. A specification to daily, hourly, monthly, etc. is not needed as a detailed account of all fuels used is not time specific. The source should have sufficient information for completion of the AOR.

DEP Response 5:

This condition requires that the permittee maintain records of all fuels fired: amounts, heating value and sulfur content. This information is to be provided upon request as a means of "reasonable assurance" that specific conditions are being met. No changes will be made.

6. Gulf Power October 28, 1997 Comment:

OK

A.34., B.36., C.38. Used Oil. F. Record Keeping Requirements: The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (1): Condition requires the source to maintain records of quantities of used oil generated that is transferred into the approved AST (above ground storage tank) at the source.

Comments: Current procedures allow the AST to be batch-tested once it is filled and that quantity burned. It is overly burdensome to maintain records of each volume of oil added to the AST during any period. Additionally, there is no regulatory requirement for records to be completed by any specified date, particularly arbitrarily derived dates. **Please correct the November -1998 Draft Title V Crist Permit to previously agreed language outlined below:**

f. Record Keeping Requirements. The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (2): Requires records of used oil management to completed by no later than the fifteenth day of the succeeding month.

Gulf Power October 28, 1997 Comment: There is no regulatory requirement for any specified date for record keeping completion purposes. The Department's language in this part of the proposed condition regarding consecutive 12 month periods is not consistent with earlier provisions which talk about a calendar year limitation on the total quantity of used oil that can be burned. Delete this requirement.

FDEP November 14, 1997 Response:

Your interpretation of batch testing is correct, as long as you are not blending in order to meet the limits. The requirement to complete records within 15 days of the end of a given month will be deleted. Keep in mind, however, that it is your responsibility to be able to produce these records upon Department request. The requirement to maintain records of used oil usage during the previous 12-month period will be deleted. Used oil records should be maintained on a calendar year basis.

As a result of this comment, **Condition A.34.f.** is changed:

From:
f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
(1) The gallons of on-specification used oil generated and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
(2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
(3) Results of the analyses required above.
[40 CFR 279.61 and 40 CFR 761.20(e)]
To:
f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
(1) The gallons of on-specification used oil generated and burned each month.
(2) Results of the analyses required above.
(3) Other information, besides testing, used to make a claim that the used oil meets the requirements of on-specification used oil or that the used oil contains less than 50 ppm of PCBs.
[40 CFR 279.72(b), 40 CFR 279.74(b) and 40 CFR
761.20(e)]

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP November 14, 1997response.

DEP Response 6:

As long as there is operator knowledge that the individual quantities being placed into the batch tank contain less than the allowable 50 ppm of PCBs, batching is acceptable. However, if there is any question as to the PCB content, the individual quantity must be tested prior to being added to the batch tank. Conditions A.34, B.36. & C.38. were slightly altered from the October, 1997 Draft permit for consistency with other Title V permits. In response to your concerns, a clarifying statement will be added to paragraph f.(2).

As a result of this comment, paragraph f.(2), of conditions A.34., B.36. & C.38., is changed:

From:

f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
(1) The gallons of on-specification used oil placed into inventory to be burned and the gallons of on-specification used oil burned each month.
(2) Results of the analyses of each deposit of used oil, as required by the above conditions.
(3) Other information, besides testing, used to make a claim that the used oil meets the requirements of on-specification used oil or that the used oil contains less than 50 ppm of PCBs.
[40 CFR 279.72(b), 40 CFR 279.74(b) and 40 CFR 761.20(e)]

To:

f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
(1) The gallons of on-specification used oil placed into inventory to be burned and the gallons of on-specification used oil burned each month, and
(2) For each deposit of used oil, results of the analyses as required by the above conditions, or
(3) Other information, besides testing, used to make a claim that the used oil meets the requirements of on-specification used oil or that the used oil contains less than 50 ppm of PCBs.
[40 CFR 279.72(b), 40 CFR 279.74(b) and 40 CFR 761.20(e)]

7. Gulf Power October 28, 1997 Comment:

B.3., C.3. Methods of Operation

- Correct B.3. by deleting statement referencing Fuel Oil is only used for periods of startup and as needed for flame stabilization. Crist Unit 4 & 5 has full capacity capability with fuel oil. See B.1. Permitted Capacity.

- Replace "on-site" generated with "Gulf Power".

- Add new Section (B) Other: Also add: Use of GAM-60 additive as necessary for re-heat temperature control.

OK

✓

DEP Response 7:

- Of the four units regulated in sections B. and C. (units 4. 5. 6. & 7.), only unit 6 is currently permitted (AO17-171809) to use oil and gas as auxiliary fuels. While the Department agrees that it is difficult to startup on coal alone, these units are in no way permitted for 100% fuel oil firing. From information contained in your Title V permit application, the Department understands that in order to meet your allowable particulate matter

limitations, these units are fired with natural gas until full load conditions are met. Once the proper temperatures are reached, the electrostatic precipitators are turned on and coal then replaces the natural gas. Fuel oil is used as a "back-up" to the natural gas if the gas is not available. Conditions B.3. & C.3. will not be changed.

- Gulf Power is authorized to burn "on-site generated oil contaminated soil" because it is preferable to burn it on-site rather than transporting the contamination off-site. Gulf Power is not authorized to remediate contaminated soil from any other site. This requirement will not be changed in the Title V permit.
- The use of GAM-60 will not be added as a method of operation in the Title V permit until the Northwest District compliance office is satisfied that there will be no measurable increases in emissions.

8. Gulf Power December 15, 1998 Comment:

B.16., C.16. Sulfur Dioxide. Correct monitoring to "compliance" for SO_2 CEMS. Add permit note under B.22., B.23., C.23., C.24. to note use of CEMS for SO_2 compliance. This will correct the general confusion in the permit regarding what is the compliance method for SO_2 under B.22 and B.23. (also C.23. and C.24.).

DEP Response 8:

Conditions B.16. and C.16. are monitoring requirements, not compliance requirements. The following permitting note will be added following conditions B.22. and C.23. to clarify that Gulf Power has elected to demonstrate compliance with the SO_2 limitation by means of a CEMS:

{Permitting Note: The permittee has elected to demonstrate compliance by means of a continuous emissions monitoring system (CEMS). In addition to any other requirements associated with the operation and maintenance of these CEMS (i.e., Acid Rain requirements), operation of the CEMS shall be in accordance with the requirements listed below. The annual calibration RATA associated with these CEMS may be used in lieu of the required annual EPA Reference Method 6, as long as all of the requirements of Rule 62-297.310, F.A.C., are met (i.e., prior test notification, proper test result submittal, etc.).}

9. Gulf Power December 15, 1998 Comment:

Add new B.19. similar to C.19. for additive testing. Additionally, Gulf Power believes GAM-60 should be tested only once to satisfy that the additive has no impact on compliance to particulate and/or SO_2. Once a successful test shows no impact, annual testing should be deleted from the permit.

OK

NO

DEP Response 9:

References to GAM-60 will not be added during this permitting action (see DEP Response 7). If eventually added, annual testing while injecting this additive would be required (see condition C.19.).

Change

10. Gulf Power December 15, 1998 Comment:

B.24., C.25. Continuous Monitor Performance Specifications. Plant does not current meet all aspects of 40 CFR Part 60 NSPS regulation. Add "or meet 40 CFR Part 75". Part 75 is generally more restrictive than Part 60. FDEP has previously agreed to this change in Compliance Simplification Workshops.

Please add "or meet 40 CFR Part 75".

DEP Response 10:

EPA has agreed that the use of an Acid Rain CEMS, in lieu of a 40 CFR 60 CEMS, is an acceptable alternative since the CEMS requirements of 40 CFR Part 75 are equivalent to, or more stringent than, the requirements of 40 CFR Part 60. While the units covered by this permit are not NSPS units, this request appears to be a reasonable alternative that would be supported by EPA for SIP units. In response to this comment, conditions B.24. & C.25. are changed:

From:

B.24., C.25. Continuous Monitor Performance Specifications. If continuous monitoring systems are required by rule or are elected by the permittee to be used for demonstrating compliance with the standards of the Department, they must be installed, maintained and calibrated in accordance with the EPA performance specifications listed below. These Performance Specifications are contained in 40 CFR 60, Appendix B, and are adopted by reference in Rule 62-204.800, F.A.C.

(1) Performance Specification 1--Specifications and Test Procedures for Opacity Continuous Emission Monitoring Systems in Stationary Sources.
(2) Performance Specification 2--Specifications and Test Procedures for SO_2 Continuous Emission Monitoring Systems in Stationary Sources.
(3) Performance Specification 3--Specifications and Test Procedures for CO_2 Continuous Emission Monitoring Systems in Stationary Sources.

[Rule 62-297.520, F.A.C.]

To:

B.24., C.25. Continuous Monitor Performance Specifications. If continuous monitoring systems are required by rule or are elected by the permittee to be used for demonstrating compliance with the standards of the Department, they must be installed, maintained and calibrated, either:

(a) in accordance with the EPA performance specifications listed below. These Performance Specifications are contained in 40 CFR 60, Appendix B, and are adopted by reference in Rule 62-204.800, F.A.C.
  (1) Performance Specification 1--Specifications and Test Procedures for Opacity Continuous Emission Monitoring Systems in Stationary Sources.
  (2) Performance Specification 2--Specifications and Test Procedures for SO_2 Continuous Emission Monitoring Systems in Stationary Sources.
  (3) Performance Specification 3--Specifications and Test Procedures for CO_2 Continuous Emission Monitoring Systems in Stationary Sources. Or,

covered in C.23(b) 18 hrs of valid data

(b) in accordance with the applicable requirements of 40 CFR 75, Subparts B and C. ~~Missing data shall be substituted in a manner pursuant to 40 CFR 75, Subpart D. Record-keeping and reporting shall be conducted pursuant to 40 CFR 75, Subparts F and G.~~ Excess emissions pursuant to Rule 62-210.700, F.A.C., shall be determined using the 40 CFR part 75 CEMS.

[Rule 62-297.520, F.A.C.; 40 CFR 75; and, Applicant request.]

11. Gulf Power December 15, 1998 Comment:

C.9. Sulfur Dioxide - Solid Fuel. Delete reference to unit not exceeding 87,035 tons per year. This statement was included as informational data from the Unit 6 construction permit. New guidance under Permit Simplification grants removal of informational data as permit limitations. See latest FAW notice.

DEP Response 11:

This is a condition that was established by a construction permit and can not be removed by a Title V permit. No change will be made.

12. Gulf Power December 15, 1998 Comment:

C.36. Recordkeeping Requirements. Delete specific requirement to maintenance logs for CEMS. This item is already covered under QA/QC requirements under C.24. and C.25.

DEP Response 12:

This is a condition that was established by a construction permit and can not be removed by a Title V permit. No change will be made.

13. Gulf Power December 15, 1998 Comment:

Appendix I-1 List of Insignificant Emissions Units and/or Activities.
General Comment: Many of the list of trivial or insignificant activities noted under the facility section and the applicant's "Emissions Unit 10" outlined in the Crist Title V Application were not included in the final permit. Gulf Power assumes that these activities and units not listed in the permit were determined to be either exempt or unregulated as "Trivial" by the Department's guidance memorandum dated March 15, 1996, or agreed to by the Department as case by case trivial activities requiring no permitting action.

FDEP agreed with this statement in a November 14, 1997 response. Gulf Power requests the above statement be incorporated under Appendix I-1 as a Permit Note.

DEP Response 13:

The permit application is not a part of the permit, but a basis for the permit. Therefore, items contained in the application that are not referenced in the permit do not need explanatory permitting notes. No changes are needed.

14. Gulf Power December 15, 1998 Comment:

Appendix U1 List of Unregulated Emissions Units and/or Activities.
Correct Cooling Towers SCC Code = 3-90-900-04

DEP Response 14:

Thank you. Item –ddd in Appendix U-1 will be changed:

From:
-ddd Cooling Towers. SCC: _____

To:
-ddd Cooling Towers. SCC: 3-90-900-04

15. Gulf Power December 15, 1998 Comment:

Appendix CP-1 Alternative Phase II NO_x Compliance Plan.
I. Change status reporting from quarterly to biannual pursuant to new Permit Simplification rules. See FAW.

DEP Response 15:

The current version of Rule 62-213.440(2)(a), F.A.C., issued 2/24/99, requires that the source "...shall meet measurable and enforceable milestones on no less than a semiannual basis until compliance is achieved and demonstrated to the Department...". As a result of this comment, condition 1 of the compliance plan is changed:

From:

1. Within 15 days of the end of each calendar quarter (i.e. March 31, June 30, September 30, December 31), the permittee shall notify the Department, in writing, of the status of the approval of the Phase II NO_X averaging plan with respect to the other involved permitting authorities. All reports shall be accompanied by a certification, signed by the responsible official, in accordance with Rule 62-213.420(4), F.A.C.

To:

1. Within 15 days of the end of each calendar half (i.e. June 30 & December 31), the permittee shall notify the Department, in writing, of the status of the approval of the Phase II NO_X averaging plan with respect to the other involved permitting authorities. All reports shall be accompanied by a certification, signed by the responsible official, in accordance with Rule 62-213.420(4), F.A.C.

In addition, condition 2 will be changed:

From:

2. In order for the Phase II NO_X averaging plan to be approved by the State of Florida and to become eligible for use on the inception date of the Phase II NO_X emission limits (January 1, 2000), the certification that all of the other involved permitting authorities have approved the averaging plan must be submitted no later than the notification following the end of the third quarter (September 30) of 1999.

To:

2. In order for the Phase II NO_X averaging plan to be approved by the State of Florida and to become eligible for use on the inception date of the Phase II NO_X emission limits (January 1, 2000), the certification that all of the other involved permitting authorities have approved the averaging plan must be submitted no later than September 30, 1999.

16. Gulf Power December 15, 1998 Comment:

Table 2-1 Summary of Compliance Requirements. Correct Units 004, 005, 006, 007 SO_2 method of compliance to Fuel Sampling and Analysis/CEMS, Time of Frequency (24 hour sample), Minimum Compliance Test Duration (24 hour or NA). See Ft. Worth example. Also delete NO_X pollutant under 007 and reference to C.12 Permit Condition.

DEP Response 16:

The Department acknowledges your request and changes will be made to better reflect the allowable methods of compliance. As a result of this comment, the NO_X entry for unit 7 is deleted and the entries for SO_2 for units 4, 5, 6 and 7 in table 2-1 are changed:

From:

(Units 4 & 5)

SO_2	Coal	6, 6A, 6B or 6C	Annually [3]	Sept. 30	1 Hour	Yes	B.15. - 18., 22. - 36.
	Natural Gas	6, 6A, 6B or 6C	Annually [3]	Sept. 30	1 Hour	Yes	
	Fuel Oil	6, 6A, 6B or 6C	Annually [3]	Sept. 30	1 Hour	Yes	

(Units 6 & 7)

SO_2	Coal	6, 6A, 6B or 6C	Annually [3]	Sept. 30	1 Hour	Yes	C.15. - 18., 23. - 37.
	Natural Gas	6, 6A, 6B or 6C	Annually [3]	Sept. 30	1 Hour	Yes	
	Fuel Oil	Fuel Sampling & Analysis Provided by Vendor				Yes	

To:

(Units 4 & 5)

SO_2	Coal	Fuel Sampling & Analysis/CEMS	24 hour avg.	Sept. 30	Annual RATA	Yes	B.15. - 18., 22. - 36.
	Natural Gas	or	or	Sept. 30	or	Yes	
	Fuel Oil	6, 6A, 6B or 6C	Annually [3]	Sept. 30	1 Hour	Yes	*(Subject to change)*

(Units 6 & 7)

SO_2	Coal	Fuel Sampling & Analysis/CEMS	24 hour avg.	Sept. 30	Annual RATA	Yes	C.15. - 18., 23. - 37.
	Natural Gas	or	or	Sept. 30	or	Yes	
	Fuel Oil	6, 6A, 6B or 6C	Annually [3]	Sept. 30	1 Hour	Yes	*(Subject to change)*

D. Documents on file with the permitting authority:

-Letter received October 28, 1997, from Mr. Dwain Waters.
-E-mail memo received November 3, 1997, from Ms. Kim Gates.
-E-mail memo received December 22, 1998, from Mr. Dwain Waters.

III. Conclusion.

The enclosed PROPOSED Title V Air Operation Permit includes the aforementioned changes to the revised DRAFT Title V Air Operation Permit.

The permitting authority will issue the PROPOSED Permit No.: 0330045-001-AV, with the changes noted above.

FDEP/Gulf Power Title V Meeting
Agenda
04/13/99 1:30 PM

- Review FDEP April 2, 1999 response to Gulf Power December 15, 1998 comments for Plant Crist. (Items 1-16)

- Review Option to include Periodic Monitoring Language for Crist in Final Draft Permit.
  -Gulf Power to present historical data.

- FDEP Status Update on Title V Permits for Plants Smith and Scholz.
  -FDEP staff to overview modeling results (Jonathan & Cleve)
  -Identify other issues that may effect these facilities.

- New Title V Application for Pea Ridge Generating Facility (Air Products).

- Develop Schedule to accomplish issues identified above.

No Dept. Notice 4/13/99 given to DEP prior to Special PM Test for GAM-60 Per Andy Allen

Extras

Florida Department of Environmental Protection

Meeting Sign-In Sheet

Re: Gulf Power

Date: Apr. 13, 1999

Name	Representing	Telephone
Scott Sheplak	DEP	850/921-9532
Jonathan Holtom	DEP	921-9531
Cleve Holladay	DEP	921-8986
Angela Morrison	Gulf Power / HGSS	850-425-2258
Dwain Waters	Gulf Power	850-444-6627
Clair Fancy	DEP	921-9523
Pat Comer	DEP	921-9621
Bruce Mitchell	DEP / DARM / BAR / Title V	850/921-9506

FDEP/Gulf Power Title V Meeting
Agenda
04/13/99 1:30 PM

- Review FDEP April 2, 1999 response to Gulf Power December 15, 1998 comments for Plant Crist. (Items 1-16)

- Review Option to include Periodic Monitoring Language for Crist in Final Draft Permit.
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  -FDEP staff to overview modeling results (Jonathan & Cleve)
  -Identify other issues that may effect these facilities.

- New Title V Application for Pea Ridge Generating Facility (Air Products).

- Develop Schedule to accomplish issues identified above.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the matter of an
Application for Permit
By:
M. L. Gilchrist
Manager of Fuel and Environmental Affairs
Gulf Power Company
Post Office Box 1151
Pensacola, Florida 32520-0328

DEP File No. AC17-234016
Escambia County

Enclosed is Permit Number AC17-234016 to construct a replacement electrostatic precipitator for Crist Unit 6, issued pursuant to Section 403.087, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, 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 Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, 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 days from the date this Notice is filed with the Clerk of the Department.

Executed in Pensacola, Florida.

State of Florida Department
of Environmental Protection

BOBBY A. COOLEY
District Director

160 Governmental Center
Pensacola, Florida 32501-5794
(904) 436-8300

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on October 7, 1993 to the listed persons.

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52(11),
Florida Statutes, with the designated
Department clerk, receipt of which is
hereby acknowledged.

Clerk

10/7/93
Date

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):

Airborne Contaminant Emitted	FAC Rule	Allowable Emissions T/yr
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
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:
SO_2 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 SO_2 emissions measured by the continuous monitor that exceeds the standard, or daily average SO_2 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 SO_2 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 SO_2 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.

Pollutant	Test Method
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 SO_2 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 SO_2 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 SO_2 emission compliance by the temporary use of a spare SO_2 emission monitor. The spare SO_2 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

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AC17-234016
Date of Issue: October 7, 1993
Expiration Date: December 1, 1994

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, 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 any vested rights or any exclusive privileges. Nor 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 does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in 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 and used by the permittee to achieve compliance with the conditions of this permit, are 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

a. Having access to and copying any records that must be kept under the conditions of this permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
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Date of Issue: October 7, 1993
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GENERAL CONDITIONS:

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with 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 17-4.120 and 17-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. 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

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004506
Permit/Certification Number: AC17-234016
Date of Issue: October 7, 1993
Expiration Date: December 1, 1994

GENERAL CONDITIONS:

monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurement;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. 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 the 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.

calorific value (GCV) of the oil; and, if necessary, the density of the oil. Use the sulfur content, density, and gross calorific value, determined under the provisions of this section, to calculate SO_2 mass emission rate and heat input rate for each fuel using the applicable procedures of section 3 of this appendix. The designated representative may petition for reduced GCV and or density sampling under § 75.66 if the fuel combusted has a consistent and relatively non-variable GCV or density.

Table D-4 -- Oil Sampling Methods and Sulfur, Density and Gross Calorific Value Used in Calculations

Parameter	Sampling Technique/Frequency	Value used in Calculations
Oil Sulfur Content	Daily manual sampling	1. Highest sulfur content from previous 30 daily samples; or 2. Actual daily value
	Flow proportional/weekly composite	Actual measured value
	In storage tank (after addition of fuel to tank)	1. Actual measured value; or 2. Highest of all sampled values in previous calendar year; or 3. Maximum value allowed by contract [1]
	As delivered (in delivery truck or barge)[1]	1. Highest of all sampled values in previous calendar year; or 2. Maximum value allowed by contract [1]
Oil Density	Daily manual sampling	1. Use the highest density from the previous 30 daily samples; or 2. Actual measured value
	Flow proportional/weekly composite	Actual measured value
	In storage tank (after addition of fuel to tank)	1. Actual measured value; or 2. Highest of all sampled values in previous calendar year; or 3. Maximum value allowed by contract [1]
	As delivered (in delivery truck or barge)[1]	1. Highest of all sampled values in previous calendar year; or 2. Maximum value allowed by contract [1]
Oil GCV	Daily manual sampling	1. Highest fuel GCV from the previous 30 daily samples; or 2. Actual measured value
	Flow proportional/weekly composite	Actual measured value
	In storage tank (after addition of fuel to tank)	1. Actual measured value; or 2. Highest of all sampled values in previous calendar year; or 3. Maximum value allowed by contract [1]
	As delivered (in delivery truck or barge)[1]	1. Highest of all sampled values in previous calendar year; or 2. Maximum value allowed by contract [1]

[1]Assumed values may only be used if sulfur content, gross calorific value, or density of each sample is no greater than the assumed value used to calculate emissions or heat input.

described in section 2.2.4.3 of this appendix to calculate SO_2 mass emission rate. Calculate heat input rate using the gross calorific value from either: (1) the most recent oil sample taken or (2) one of the conservative assumed values described in section 2.2.4.3 of this appendix.

2.2.4.3 Sampling from Each Delivery

Alternatively, an oil sample may be taken from (1) the shipment tank or container upon receipt of each lot of fuel oil or (2) the supplier's storage container which holds the lot of fuel oil. (Note: a supplier need only sample the storage container once for sulfur content, GCV and, where required, the density so long as the fuel sulfur content and GCV do not change and no fuel is added to the supplier's storage container.)

For the purpose of this section, a lot is defined as a shipment or delivery (e.g., ship load, barge load, group of trucks, discrete purchase of diesel fuel through a pipeline, etc.) of a single fuel.

Oil sampling may be performed either by the owner or operator of an affected unit, an outside laboratory, or a fuel supplier, provided that samples are representative and that sampling is performed according to either the single tank composite sampling procedure or the all-levels sampling procedure in ASTM D4057-88, "Standard Practice for Manual Sampling of Petroleum and Petroleum Products" (incorporated by reference under § 75.6). Except as otherwise provided in this section, calculate SO_2 mass emission rate using the sulfur content (and where required, the density) from one of the two values below, and calculate heat input using the gross calorific value from one of the two following values: (1) the highest value sampled during the previous calendar year (this

CEM SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant (Circle one: SO2 / NOx / TRS / H2S / CO / Opacity)

Reporting Period Dates: From: **October 1, 1998** To: **December 31, 1998**

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

- Emissions Limitation: 40%
- Monitor Manufacturer and Model No.: Lear Siegler SS-4542
- Date of Latest EMS Certification or Audit: 10/19/98
- Total source operating time in reporting period: 73,848 Minutes *1*

Process Unit(s) Description:

CRIST 4

EMISSION DATA SUMMARY *1*	
1. Duration of excess emissions in reporting period due to:	
a. Startup/Shutdown	18
b. Control equipment problems	84
c. Process problems	0
d. Other known causes load change, soot blow	0
e. Unknown causes	0
2. Total duration of excess emissions: (Minutes)	102
3. Total duration of excess emissions x (100) / (Total source operating time)	0.1% *2*

CMS PERFORMANCE SUMMARY *1*	
1. CMS downtime in reporting period due to:	
a. Monitor equipt. malfunctions	330
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	60
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	390
3. (Total CMS Downtime) x (100) / (Total source operating time)	0.5% *2*

On a separate page, describe any changes since last quarter in CMS, process or controls.

I certify that the information contained in this report is true, accurate, and complete.

J. O. Vick — Name
Signature
Manager of Environmental Affairs — Title
01/28/99 — Date

1 For opacity, record all times in minutes. For gases, record all times in hours.

2 For the reporting period: If the total duration of excess emissions is one percent or greater of the total operating time or the total CMS downtime is five percent or greater of the total operating time, both the summary report form and the excess emission report described in 60.7(c) shall be submitted.

CEM SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant (Circle one: SO2 / NOx / TRS / H2S / CO / (Opacity))

Reporting Period Dates: From: **October 1, 1998** To: **December 31, 1998**

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

- Emissions Limitation: 40%
- Monitor Manufacturer and Model No.: Lear Siegler SS-4542
- Date of Latest EMS Certification or Audit: 10/19/98
- Total source operating time in reporting period: 125,808 Minutes *1*

Process Unit(s) Description:

CRIST 5

EMISSION DATA SUMMARY *1*	
1. Duration of excess emissions in reporting period due to:	
a. Startup/Shutdown	0
b. Control equipment problems	6
c. Process problems	0
d. Other known causes load change, soot blow	0
e. Unknown causes	0
2. Total duration of excess emissions: (Minutes)	6
3. Total duration of excess emissions x (100) / (Total source operating time)	0.0% *2*

CMS PERFORMANCE SUMMARY *1*	
1. CMS downtime in reporting period due to:	
a. Monitor equipt. malfunctions	234
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	60
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	294
3. (Total CMS Downtime) x (100) / (Total source operating time)	0.2% *2*

On a separate page, describe any changes since last quarter in CMS, process or controls.

I certify that the information contained in this report is true, accurate, and complete.

J. O. Vick		Manager of Environmental Affairs	01/28/99
Name	Signature	Title	Date

1 For opacity, record all times in minutes. For gases, record all times in hours.

2 For the reporting period: If the total duration of excess emissions is one percent or greater of the total operating time or the total CMS downtime is five percent or greater of the total operating time, both the summary report form and the excess emission report described in 60.7(c) shall be submitted.

CEM SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant (Circle one: SO2 / NOx / TRS / H2S / CO (Opacity))

Reporting Period Dates: From: **October 1, 1998** To: **December 31, 1998**

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

- Emissions Limitation: 40%
- Monitor Manufacturer and Model No.: Lear Siegler SS-4542
- Date of Latest EMS Certification or Audit: 11/04/98
- Total source operating time in reporting period: 122,490 Minutes *1*

Process Unit(s) Description:

CRIST 6

EMISSION DATA SUMMARY *1*	
1. Duration of excess emissions in reporting period due to:	
a. Startup/Shutdown	36
b. Control equipment problems	54
c. Process problems	0
d. Other known causes load change, soot blow	18
e. Unknown causes	0
2. Total duration of excess emissions: (Minutes)	108
3. Total duration of excess emissions x (100) / (Total source operating time)	0.1% *2*

CMS PERFORMANCE SUMMARY *1*	
1. CMS downtime in reporting period due to:	
a. Monitor equipt. malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	60
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	60
3. (Total CMS Downtime) x (100) / (Total source operating time)	0.0% *2*

On a separate page, describe any changes since last quarter in CMS, process or controls.

I certify that the information contained in this report is true, accurate, and complete.

J. O. Vick		Manager of Environmental Affairs	01/28/99
Name	Signature	Title	Date

1 For opacity, record all times in minutes. For gases, record all times in hours.

2 For the reporting period: If the total duration of excess emissions is one percent or greater of the total operating time or the total CMS downtime is five percent or greater of the total operating time, both the summary report form and the excess emission report described in 60.7(c) shall be submitted.

CEM SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant (Circle one: SO2 / NOx / TRS / H2S / CO / (Opacity))

Reporting Period Dates: From: **October 1, 1998** To: **December 31, 1998**

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

- Emissions Limitation: 40%
- Monitor Manufacturer and Model No.: Lear Siegler SS-4542
- Date of Latest EMS Certification or Audit: 11/04/98
- Total source operating time in reporting period: 118,254 Minutes *1*

Process Unit(s) Description:

CRIST 7

EMISSION DATA SUMMARY *1*	
1. Duration of excess emissions in reporting period due to:	
a. Startup/Shutdown	30
b. Control equipment problems	6
c. Process problems	0
d. Other known causes load change, soot blow	162
e. Unknown causes	0
2. Total duration of excess emissions: (Minutes)	198
3. Total duration of excess emissions x (100) / (Total source operating time)	0.2% *2*

CMS PERFORMANCE SUMMARY *1*	
1. CMS downtime in reporting period due to:	
a. Monitor equipt. malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	60
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	60
3. (Total CMS Downtime) x (100) / (Total source operating time)	0.1% *2*

On a separate page, describe any changes since last quarter in CMS, process or controls.

I certify that the information contained in this report is true, accurate, and complete.

J. O. Vick		Manager of Environmental Affairs	01/28/99
Name	Signature	Title	Date

1 For opacity, record all times in minutes. For gases, record all times in hours.

2 For the reporting period: If the total duration of excess emissions is one percent or greater of the total operating time or the total CMS downtime is five percent or greater of the total operating time, both the summary report form and the excess emission report described in 60.7(c) shall be submitted.

SO2 EMISSION SUMMARY REPORT

Fourth Quarter 1998

Crist Electric Generating Plant
OCTOBER

Date	Unit 4 SO2 lb/mmBtu		Unit 5 SO2 lb/mmBtu	Unit 6 SO2 lb/mmBtu	Unit 7 SO2 lb/mmBtu	
10/01/98	off-line		1.61	1.51	1.56	
10/02/98	off-line		1.62	1.56	1.56	
10/03/98	off-line		1.60	1.63	1.69	
10/04/98	0.47	(1)	1.47	1.45	1.68	
10/05/98	1.21		1.13	1.09	1.10	
10/06/98	1.21		1.25	1.31	1.45	
10/07/98	1.42		1.49	1.41	1.46	
10/08/98	1.62		1.50	1.48	1.59	
10/09/98	1.51		1.41	1.60	1.66	
10/10/98	1.42		1.43	1.64	1.67	
10/11/98	1.58		1.50	1.63	1.76	
10/12/98	1.56		1.48	1.59	1.70	
10/13/98	1.63		1.53	1.46	1.65	
10/14/98	1.68		1.61	1.42	1.44	
10/15/98	1.69		1.62	1.60	1.61	
10/16/98	1.66		1.58	1.57	1.61	
10/17/98	1.61		1.53	1.33	0.00	(2)
10/18/98	1.33		1.22	1.11	off-line	
10/19/98	1.16		1.09	1.05	off-line	
10/20/98	1.12		1.08	1.07	off-line	
10/21/98	1.16		1.16	1.02	off-line	
10/22/98	1.03	(2)	0.95	0.95	off-line	
10/23/98	off-line		0.95	1.08	off-line	
10/24/98	off-line		0.94	1.13	0.01	(1)
10/25/98	off-line		1.07	0.99	0.65	
10/26/98	0.00	(1)	1.17	1.08	1.07	
10/27/98	0.93		1.04	1.12	1.11	
10/28/98	0.99		0.96	1.14	1.24	
10/29/98	1.06		1.05	1.24	1.39	
10/30/98	1.43		1.27	1.11	1.25	
10/31/98	1.20		1.08	off-line	1.32	

(1) Less than 18 hours valid data due to startup.
(2) Less than 18 hours valid data due to shutdown.
(3) 24-hour Composite Fuel Sample.

SO2 EMISSION SUMMARY REPORT

Fourth Quarter 1998

Crist Electric Generating Plant
NOVEMBER

Date	Unit 4 SO2 lb/mmBtu		Unit 5 SO2 lb/mmBtu	Unit 6 SO2 lb/mmBtu		Unit 7 SO2 lb/mmBtu	
11/01/98	1.18		1.05	off-line		1.27	
11/02/98	1.11		0.99	off-line		1.11	
11/03/98	1.20		1.13	off-line		1.55	
11/04/98	1.40		1.36	off-line		1.28	
11/05/98	1.12		1.06	off-line		1.14	(2)
11/06/98	1.06		0.98	off-line		off-line	
11/07/98	1.04		0.99	off-line		0.01	(1)
11/08/98	1.02		0.97	1.38	(1)	1.01	
11/09/98	1.16		1.08	1.35		off-line	
11/10/98	1.38		1.38	1.29		0.63	(1)
11/11/98	1.08		1.05	1.18		1.30	
11/12/98	1.01		0.99	1.18		1.39	
11/13/98	1.01		0.99	1.17		1.17	
11/14/98	0.99		0.97	1.10		1.08	
11/15/98	0.94		0.96	1.02		0.99	
11/16/98	0.96		0.97	1.17		1.16	
11/17/98	1.13		1.09	1.44		1.53	
11/18/98	1.32		1.13	1.36		1.68	
11/19/98	1.20		1.08	1.42		1.74	
11/20/98	1.52		1.60	1.63		1.70	
11/21/98	1.54		1.64	1.67		1.77	
11/22/98	1.56	(2)	1.64	1.68		1.70	
11/23/98	off-line		1.66	1.72		1.38	
11/24/98	off-line		1.56	1.68		1.73	
11/25/98	off-line		1.45	1.64		1.68	
11/26/98	off-line		1.42	1.63		1.78	
11/27/98	off-line		1.68	1.69		1.74	
11/28/98	off-line		1.70	1.63		1.57	
11/29/98	off-line		1.64	1.61		1.65	
11/30/98	off-line		1.65	1.63		1.56	

(1) Less than 18 hours valid data due to startup.
(2) Less than 18 hours valid data due to shutdown.
(3) 24-hour Composite Fuel Sample.

SO2 EMISSION SUMMARY REPORT

Fourth Quarter 1998

Crist Electric Generating Plant
DECEMBER

Date	Unit 4 SO2 lb/mmBtu		Unit 5 SO2 lb/mmBtu		Unit 6 SO2 lb/mmBtu	Unit 7 SO2 lb/mmBtu
12/01/98	off-line		1.63		1.71	1.80
12/02/98	off-line		1.64		1.66	1.74
12/03/98	off-line		1.72		1.68	1.68
12/04/98	off-line		1.28		1.68	1.62
12/05/98	off-line		1.49		1.63	0.91
12/06/98	off-line		0.64	(2)	1.59	1.72
12/07/98	off-line		0.77		1.67	1.71
12/08/98	off-line		1.64		1.76	1.76
12/09/98	off-line		1.63		1.66	1.70
12/10/98	off-line		1.59		1.52	1.51
12/11/98	off-line		1.58		1.60	1.65
12/12/98	off-line		1.59		1.54	1.65
12/13/98	off-line		1.56		1.47	1.45
12/14/98	0.33	(1)	1.56		1.43	1.49
12/15/98	1.56		1.58		1.51	1.59
12/16/98	1.58		1.58		1.59	1.67
12/17/98	1.62		1.68		1.66	1.68
12/18/98	1.79		1.82		1.79	1.92
12/19/98	off-line		1.77		1.64	1.75
12/20/98	off-line		1.81		1.72	1.80
12/21/98	off-line		1.82		1.68	1.73
12/22/98	off-line		1.74		1.63	1.67
12/23/98	off-line		1.78		1.69	1.76
12/24/98	off-line		1.83		1.65	1.67
12/25/98	off-line		1.74		1.64	1.69
12/26/98	off-line		1.60		1.60	1.70
12/27/98	off-line		1.52	(2)	1.65	1.70
12/28/98	off-line		off-line		1.59	1.76
12/29/98	off-line		off-line		1.56	1.54
12/30/98	off-line		off-line		1.65	1.67
12/31/98	off-line		off-line		1.57	1.71

(1) Less than 18 hours valid data due to startup.
(2) Less than 18 hours valid data due to shutdown.
(3) 24-hour Composite Fuel Sample.

PCT ATTACHMENT "F"

State of Florida

Visible Emissions Observation Form

COMPLIANCE STATUS: YES / NO / UNK

Source/Process Information

FACILITY NAME: Gulf Power - Crist Electric Generating Plant
SOURCE NAME: Fly Ash Silo "A" | PERMIT NO: A017-234356
LOCATION/ADDRESS: Ten Mile Rd. Pensacola Fl 32514
CONTACT: John Dominey | PHONE NO: 478-5900 (ext 2219)
PROCESS/PRODUCTION RATE: Fly Ash Collection System (Dry)
CONTROL EQUIPMENT: Baghouse | OPERATING MODE: Normal
FUEL TYPE/RATE: N/A | MATERIAL TYPE/RATE: Fly Ash / Ton / hr | PERMITTED RATE: 150 Tons/hr
DESCRIBE EMISSION POINT: Farthest (North-most) Green Unit on Silo "A"
HEIGHT ABOVE GROUND LEVEL: ≈ 230 ft | HEIGHT RELATIVE TO OBSERVER: ≈ 75 ft

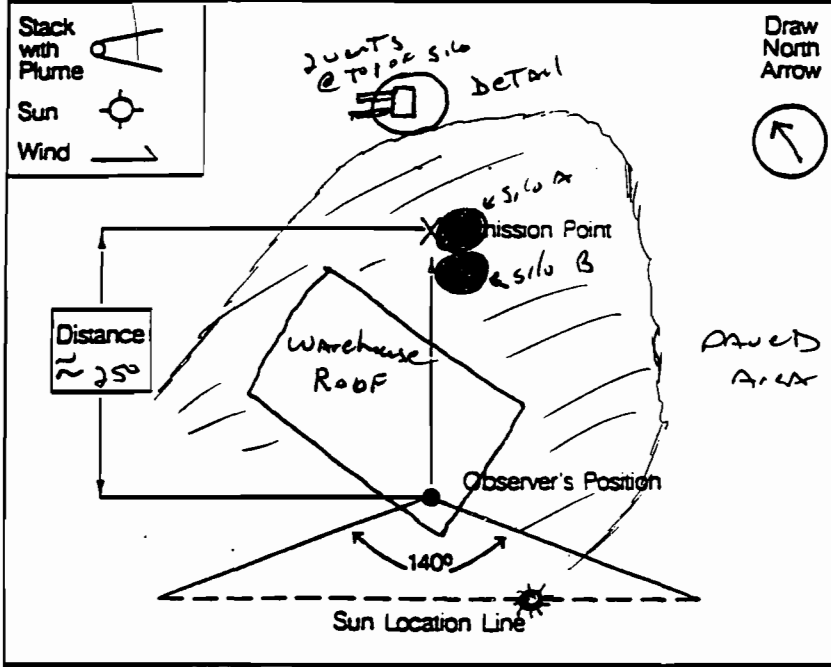
Emissions Description

DESCRIBE EMISSIONS: START: Light Periodic Puffs | END: Same
PLUME COLOR: Gray | PLUME TYPE: Lofting
WATER DROPLETS PRESENT? YES ☐ NO ☑ | IF YES, IS PLUME: ATTACHED ☐ DETACHED ☐

Meteorological Information

BACKGROUND: START: Sky / Steam Plume | END: Same | BACKGROUND COLOR: START: Blue Sky / White Steam | END: Same
SKY CONDITIONS (% CLOUD COVER): START: Broken | END: Broken | AMBIENT TEMP: START: 63° | END: 63°
WIND SPEED: START: 5-10 mph | END: Same | WIND DIRECTION: START: NW | END: NW

Observation Data, Site Diagram



Opacity Readings

OBSERVATION DATE: 12/29/98 | START TIME: 1200 | STOP TIME: 1300

SEC / MIN	0	15	30	45	SEC / MIN	0	15	30	45
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2	0	0	0	0	32	0	0	0	0
3	0	0	0	0	33	0	0	0	0
4	0	0	0	0	34	0	0	0	0
5	0	0	0	0	35	0	0	0	0
6	0	0	0	0	36	0	0	0	0
7	0	0	0	0	37	0	0	0	0
8	0	0	0	0	38	0	0	0	0
9	0	0	0	0	39	0	0	0	0
10	0	0	0	0	40	0	0	0	0
11	0	0	0	0	41	0	0	0	0
12	0	0	0	0	42	0	0	0	0
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17	0	0	0	0	47	0	0	0	0
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27	0	0	0	0	57	0	0	0	0
28	0	0	0	0	58	0	0	0	0
29	0	0	0	0	59	0	0	0	0
30	0	0	0	0	60	0	0	0	0

Compliance Information

RANGE OF OPACITY READINGS: MIN 0 MAX 0
AVERAGE OF HIGHEST 24 CONSECUTIVE READINGS: 0
SHORT TERM AVERAGE DATA: AVERAGING PERIOD N/A MINUTES | ACTUAL AVERAGE N/A %
COMMENTS:

Certification Data, Signatures

OBSERVER'S NAME: Kevin Lee Beaty
OBSERVER'S SIGNATURE: Kevin Beaty | DATE: 12/29/98
ORGANIZATION: Gulf Power Company
CERTIFIED BY: Eastern Technical Assoc. | DATE: 11/98
I HAVE RECEIVED A COPY OF THESE OBSERVATIONS. SIGNATURE | DATE
APS NUMBER

PCT ATTACHMENT "F"

State of Florida

Visible Emissions Observation Form

COMPLIANCE STATUS: YES | NO | UNK

Source/Process Information

FACILITY NAME: Gulf Power Crist Electric Generating Plant
SOURCE NAME: Fly Ash Silo "A" | PERMIT NO: A017-234356
LOCATION/ADDRESS: Ten Mile Rd Pensacola, Fl, 32514
CONTACT: John Downey | PHONE NO: 478-5900 (EXT 2719)
PROCESS/PRODUCTION RATE: Fly Ash Collection System (Dry)
CONTROL EQUIPMENT: Bag house | OPERATING MODE: Normal
FUEL TYPE/RATE: N/A | MATERIAL TYPE/RATE: Fly Ash / Ton/hr | PERMITTED RATE: 150 Ton/hr
DESCRIBE EMISSION POINT: Nearest (South most) Green Vent on Silo "A"
HEIGHT ABOVE GROUND LEVEL: ≈ 230 ft | HEIGHT RELATIVE TO OBSERVER: ≈ 75 ft

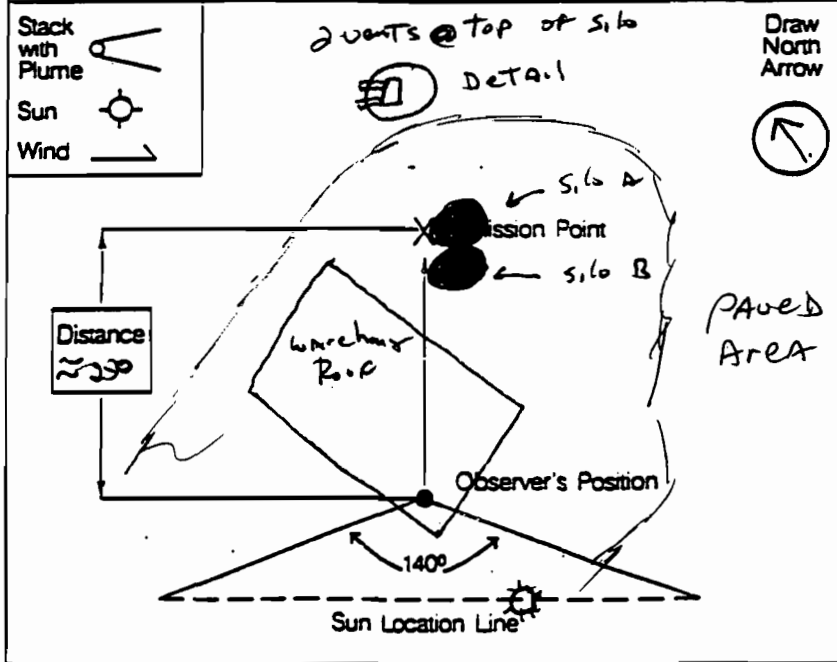
Emissions Description

DESCRIBE EMISSIONS: START Light Periodic Puffing END Same
PLUME COLOR: Gray | PLUME TYPE: Lofting
WATER DROPLETS PRESENT? YES ☐ NO ☑ | IF YES, IS PLUME: ATTACHED ☐ DETACHED ☐

Meteorological Information

BACKGROUND: START Sky / Steam Plume END Same | BACKGROUND COLOR: START Blue Sky white Steam END Same
SKY CONDITIONS/% CLOUD COVER: START Broken END Broken | AMBIENT TEMP: START 63° END 63°
WIND SPEED: START 5-10 mph END Same | WIND DIRECTION: START NW END NW

Observation Data, Site Diagram



Opacity Readings

OBSERVATION DATE: 12/29/98 | START TIME: 1200 | STOP TIME: 1300

SEC / MIN	0	15	30	45	SEC / MIN	0	15	30	45
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2	0	0	0	0	32	0	0	0	0
3	0	0	0	0	33	0	0	0	0
4	0	0	0	0	34	0	0	0	0
5	0	0	0	0	35	0	0	0	0
6	0	0	0	0	36	0	0	0	0
7	0	0	0	0	37	0	0	0	0
8	0	0	0	0	38	0	0	0	0
9	0	0	0	0	39	0	0	0	0
10	0	0	0	0	40	0	0	0	0
11	0	0	0	0	41	0	0	0	0
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25	0	0	0	0	55	0	0	0	0
26	0	0	0	0	56	0	0	0	0
27	0	0	0	0	57	0	0	0	0
28	0	0	0	0	58	0	0	0	0
29	0	0	0	0	59	0	0	0	0
30	0	0	0	0	60	0	0	0	0

Compliance Information

RANGE OF OPACITY READINGS: MIN 0 MAX 0
AVERAGE OF HIGHEST 24 CONSECUTIVE READINGS: 0
SHORT TERM AVERAGE DATA: AVERAGING PERIOD N/A MINUTES | ACTUAL AVERAGE N/A %
COMMENTS:

Certification Data, Signatures

OBSERVERS NAME: Kevin Lee Beaty
OBSERVERS SIGNATURE: Kevin Lee Beaty | DATE: 12/29/98
ORGANIZATION: Gulf Power Company
CERTIFIED BY: Eastern Technical Assoc | DATE: 11/98
I HAVE RECEIVED A COPY OF THESE OBSERVATIONS. SIGNATURE | DATE
APS NUMBER

PCT ATTACHMENT "F"

State of Florida

Visible Emissions Observation Form

COMPLIANCE STATUS: YES / NO / UNK

Source/Process Information

FACILITY NAME: Gulf Power Crist Electric Generating Plant
SOURCE NAME: Fly Ash Silo "B" — PERMIT NO: A 017-234356.
LOCATION/ADDRESS: Ten mile Rd Pensacola Fl 32514
CONTACT: John Dominey — PHONE NO: 478-5900 EXT 2219
PROCESS/PRODUCTION RATE: Fly Ash Collection System (Dry)
CONTROL EQUIPMENT: Bag house — OPERATING MODE: Normal
FUEL TYPE/RATE: N/A — MATERIAL TYPE/RATE: Fly Ash TON/HR — PERMITTED RATE: 150 TON/hr
DESCRIBE EMISSION POINT: Farthest (North-most) Green Vent on Silo B
HEIGHT ABOVE GROUND LEVEL: ≈ 230 FT — HEIGHT RELATIVE TO OBSERVER: ≈ 75 FT

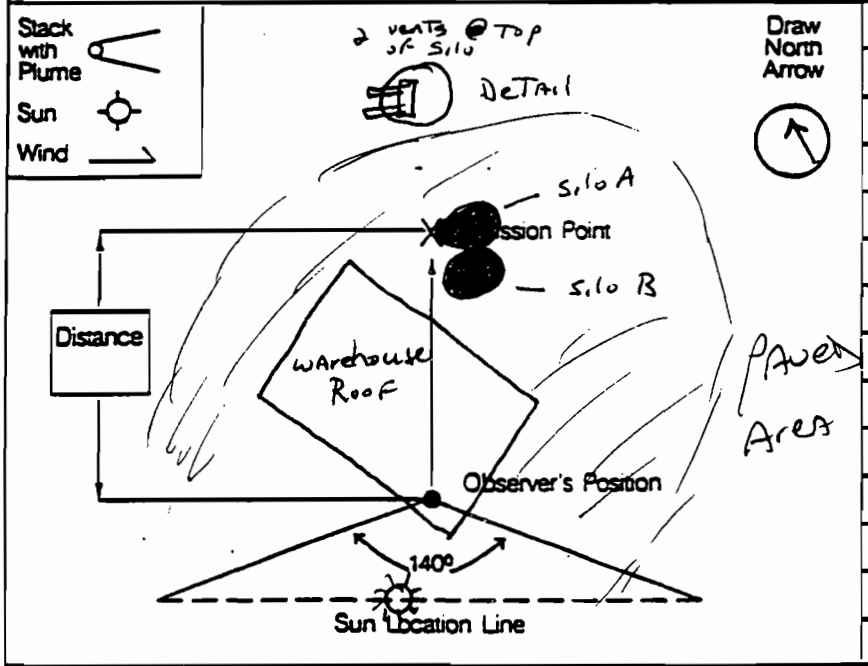
Emissions Description

DESCRIBE EMISSIONS — START: Light periodic puffs — END: SAME
PLUME COLOR: Gray — PLUME TYPE: Lofting
WATER DROPLETS PRESENT? YES ☐ NO ☑ — IF YES, IS PLUME: ATTACHED ☐ DETACHED ☐

Meteorological Information

BACKGROUND — START: Blue SKY — END: SAME — BACKGROUND COLOR — START: Blue — END: Blue
SKY CONDITIONS/% CLOUD COVER — START: Clear — END: SAME — AMBIENT TEMP — START: 65° — END: 65°
WIND SPEED — START: 5-10 mph — END: SAME — WIND DIRECTION — START: NW — END: NW

Observation Data, Site Diagram



Opacity Readings

OBSERVATION DATE: 12/29/98 — START TIME: 1400 — STOP TIME: 1500

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21					51				
22					52				
23					53				
24					54				
25					55				
26					56				
27					57				
28					58				
29					59				
30					60				

Compliance Information

RANGE OF OPACITY READINGS: MIN 0 MAX 0
AVERAGE OF HIGHEST 24 CONSECUTIVE READINGS: 0
SHORT TERM AVERAGE DATA — AVERAGING PERIOD: N/A MINUTES — ACTUAL AVERAGE: N/A %
COMMENTS:

Certification Data, Signatures

OBSERVER'S NAME: Kevin Lee Beaty
OBSERVER'S SIGNATURE: Kevin Beaty — DATE: 12/29/98
ORGANIZATION: Gulf Power Company
CERTIFIED BY: Eastern Technical Assoc. — DATE: 11/98
I HAVE RECEIVED A COPY OF THESE OBSERVATIONS. SIGNATURE: — DATE:
APS NUMBER:

PCT ATTACHMENT "F"

State of Florida

Visible Emissions Observation Form

COMPLIANCE STATUS: YES / NO / UNK

Source/Process Information

FACILITY NAME: Gulf Power Crist Electric Generating plant
SOURCE NAME: Fly Ash Silo B
PERMIT NO: A017-234356
LOCATION/ADDRESS: Ten Mile Rd. Pensacola Fl 32514
CONTACT: John Dominey
PHONE NO: 478-5900 EXT 2219
PROCESS/PRODUCTION RATE: Fly Ash Collection System (Dry)
CONTROL EQUIPMENT: Baghouse
OPERATING MODE: Normal
FUEL TYPE/RATE: N/A
MATERIAL TYPE/RATE: Fly Ash Tons/hr
PERMITTED RATE: 150 Tons/hr
DESCRIBE EMISSION POINT: Nearest (South most) Green Vent on Silo B
HEIGHT ABOVE GROUND LEVEL: ≈230 ft
HEIGHT RELATIVE TO OBSERVER: ≈75 ft

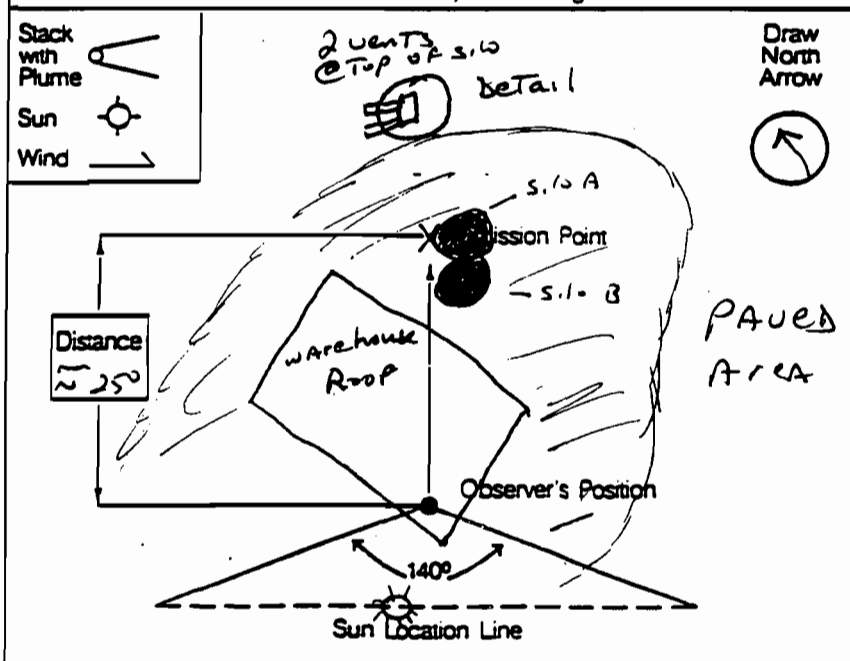
Emissions Description

DESCRIBE EMISSIONS START: ~~Black~~ ~~Grey~~ Light periodic puffs END: ~~Same~~
PLUME COLOR: Gray
PLUME TYPE: Lofting
WATER DROPLETS PRESENT? YES ☐ NO ☒
IF YES, IS PLUME: ATTACHED ☐ DETACHED ☐

Meteorological Information

BACKGROUND START: Blue Sky END: Same
BACKGROUND COLOR START: Blue END: Blue
SKY CONDITIONS/% CLOUD COVER START: Clear END: Same
AMBIENT TEMP START: 65° END: 65°
WIND SPEED START: 5-10 mph END: Same
WIND DIRECTION START: NW END: NW

Observation Data, Site Diagram



Opacity Readings

OBSERVATION DATE: 12/29/98
START TIME: 1400
STOP TIME: 1500

SEC MIN	0	15	30	45	SEC MIN	0	15	30	45
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28	0	0	0	0	58	0	0	0	0
29	0	0	0	0	59	0	0	0	0
30	0	0	0	0	60	0	0	0	0

Compliance Information

RANGE OF OPACITY READINGS: MIN 0 MAX 0
AVERAGE OF HIGHEST 24 CONSECUTIVE READINGS: 0
SHORT TERM AVERAGE DATA: AVERAGING PERIOD N/A MINUTES ACTUAL AVERAGE N/A %
COMMENTS:

Certification Data, Signatures

OBSERVERS NAME: Kevin Lee Beatty
OBSERVERS SIGNATURE: Kevin Lee Beatty DATE: 12/29/98
ORGANIZATION: Gulf Power Co.
CERTIFIED BY: Eastern Technical Assoc. DATE: 11/98
I HAVE RECEIVED A COPY OF THESE OBSERVATIONS. SIGNATURE: DATE:
APS NUMBER:

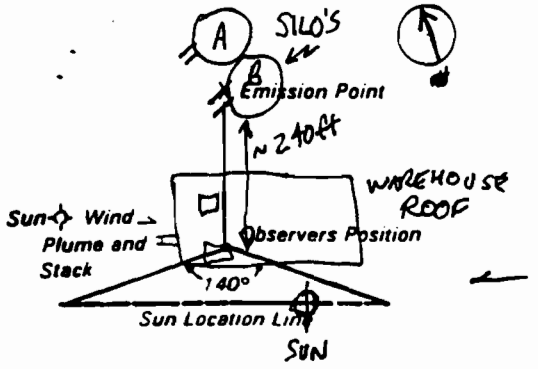
SILO B
VENT S-South

Section 3.12.10 6 April 1983

Visible Emission Observation Form

SOURCE NAME: FLY ASH SILO / PLANT CRIST	OBSERVATION DATE: 11/18/97
ADDRESS: 1999 PATE STREET	START TIME: 12:00 NOON
~~P.O. Box~~ ONE ENERGY PLACE	STOP TIME: 1:00 PM EST
CITY: PENSACOLA STATE: FL ZIP: 32520-0310	
PHONE: 478-5900 SOURCE ID NUMBER: 1017-23356	
PROCESS EQUIPMENT: FLY ASH COLLECTION OPERATING MODE: NORMAL	
CONTROL EQUIPMENT: BAGHOUSE OPERATING MODE: NORMAL	
DESCRIBE EMISSION POINT: START ON SILO B (NEAREST SOUTH-MOST VENT OF 2) STOP Same	
HEIGHT ABOVE GROUND LEVEL: START ~230' STOP Same HEIGHT RELATIVE TO OBSERVER: START ~75' STOP Same	
DISTANCE FROM OBSERVER: START ~240' STOP Same DIRECTION FROM OBSERVER: START NNW STOP Same	
DESCRIBE EMISSIONS: START NONE STOP Same	
EMISSION COLOR: START NONE STOP Same PLUME TYPE: CONTINUOUS ☐ FUGITIVE ☐ INTERMITTENT ☐ (NONE)	
WATER DROPLETS PRESENT: NO YES ☐ IF WATER DROPLET PLUME: ATTACHED ☐ DETACHED ☐	
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED: START ~~BLUE SKY~~ VENT EXIT STOP Same	
DESCRIBE BACKGROUND: START BLUE SKY STOP WHITE CLOUDS	
BACKGROUND COLOR: START BLUE STOP WHITE SKY CONDITIONS: START 50% CLOUDS & OF 80% STOP 80% CLOUDS	
WIND SPEED: START LIGHT STOP LIGHT WIND DIRECTION: START EAST (FROM) STOP FROM NE	
AMBIENT TEMP: START ~60°F STOP Same WET BULB TEMP: — RH percent: —	

Source Layout Sketch *Draw North Arrow*



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6	0	0	0	0	36	0	0	0	0
7	0	0	0	0	37	0	0	0	0
8	0	0	0	0	38	0	0	0	0
9	0	0	0	0	39	0	0	0	0
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14	0	0	0	0	44	0	0	0	0
15	0	0	0	0	45	0	0	0	0
16	0	0	0	0	46	0	0	0	0
17	0	0	0	0	47	0	0	0	0
18	0	0	0	0	48	0	0	0	0
19	0	0	0	0	49	0	0	0	0
20	0	0	0	0	50	0	0	0	0
21	0	0	0	0	51	0	0	0	0
22	0	0	0	0	52	0	0	0	0
23	0	0	0	0	53	0	0	0	0
24	0	0	0	0	54	0	0	0	0
25	0	0	0	0	55	0	0	0	0
26	0	0	0	0	56	0	0	0	0
27	0	0	0	0	57	0	0	0	0
28	0	0	0	0	58	0	0	0	0
29	0	0	0	0	59	0	0	0	0
30	0	0	0	0	60	0	0	0	0

AVERAGE OPACITY FOR HIGHEST PERIOD: 0% NUMBER OF READINGS ABOVE 5 % WERE 0

RANGE OF OPACITY READINGS: 0 % MINIMUM 0 % MAXIMUM

OBSERVER'S NAME (PRINT): GREG TERRY

COMMENTS: ONE OF TWO VENTS ON THIS SILO

TOMMY MITCHELL STARTED ASH AT 11:55

OBSERVER'S SIGNATURE: [signature] DATE: 11/18/97

ORGANIZATION: GULF POWER CO

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS
SIGNATURE

CERTIFIED BY: ETA DATE: 5/14/97

TITLE DATE

VERIFIED BY DATE

SILO B

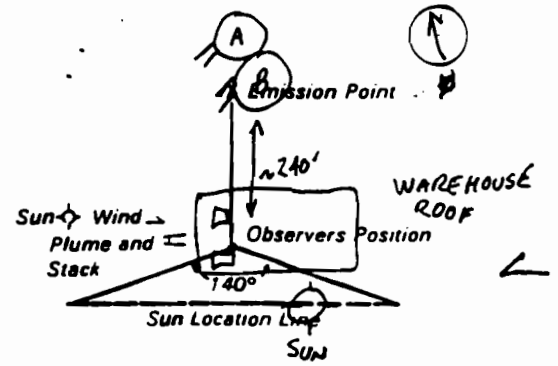
VENT N - North

Visible Emission Observation Form

SOURCE NAME: FLY ASH SILO / PLANT CRIST	OBSERVATION DATE: 11/18/97
ADDRESS: 1999 PATE STREET	START TIME: 12:00 NOON
~~20 St~~ GULF ENERGY PLACE	STOP TIME: 1:00 PM CST
CITY: PENSACOLA STATE: FL ZIP: 32520-0310	
PHONE: 478-5900 SOURCE ID NUMBER: 1017-234356	
PROCESS EQUIPMENT: FLY ASH COLLECTION OPERATING MODE: NORMAL	
CONTROL EQUIPMENT: BAGHOUSE OPERATING MODE: NORMAL	
DESCRIBE EMISSION POINT: START FARTHEREST NORTH-MOST VENT OF 2 ON B SILO STOP Same	
HEIGHT ABOVE GROUND LEVEL: START ~230' STOP same	HEIGHT RELATIVE TO OBSERVER: START ~75' STOP same
DISTANCE FROM OBSERVER: START ~240' STOP Same	DIRECTION FROM OBSERVER: START N/NW STOP Same
DESCRIBE EMISSIONS: START NONE STOP Same	
EMISSION COLOR: START NONE STOP Same	PLUME TYPE: CONTINUOUS ☐ FUGITIVE ☐ NONE INTERMITTENT ☐
WATER DROPLETS PRESENT: NO ☒ YES ☐	IF WATER DROPLET PLUME: ATTACHED ☐ DETACHED ☐
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED: START VENT EXIT STOP Same	
DESCRIBE BACKGROUND: START BLUE SKY STOP WHITE CLOUDS	
BACKGROUND COLOR: START BLUE STOP WHITE	SKY CONDITIONS: START 50% CLOUDS S. OF OBS. STOP 80% CLOUDS
WIND SPEED: START LIGHT STOP Same	WIND DIRECTION: START from East STOP from NE
AMBIENT TEMP: START ~60°F STOP Same	WET BULB TEMP. — RH percent —

SEC / MIN	0	15	30	45	SEC / MIN	0	15	30	45
1	0	0	0	0	31	0	0	0	0
2	0	0	0	0	32	0	0	0	0
3	0	0	0	0	33	0	0	0	0
4	0	0	0	0	34	0	0	0	0
5	0	0	0	0	35	0	0	0	0
6	0	0	0	0	36	0	0	0	0
7	0	0	0	0	37	0	0	0	0
8	0	0	0	0	38	0	0	0	0
9	0	0	0	0	39	0	0	0	0
10	0	0	0	0	40	0	0	0	0
11	0	0	0	0	41	0	0	0	0
12	0	0	0	0	42	0	0	0	0
13	0	0	0	0	43	0	0	0	0
14	0	0	0	0	44	0	0	0	0
15	0	0	0	0	45	0	0	0	0
16	0	0	0	0	46	0	0	0	0
17	0	0	0	0	47	0	0	0	0
18	0	0	0	0	48	0	0	0	0
19	0	0	0	0	49	0	0	0	0
20	0	0	0	0	50	0	0	0	0
21	0	0	0	0	51	0	0	0	0
22	0	0	0	0	52	0	0	0	0
23	0	0	0	0	53	0	0	0	0
24	0	0	0	0	54	0	0	0	0
25	0	0	0	0	55	0	0	0	0
26	0	0	0	0	56	0	0	0	0
27	0	0	0	0	57	0	0	0	0
28	0	0	0	0	58	0	0	0	0
29	0	0	0	0	59	0	0	0	0
30	0	0	0	0	60	0	0	0	0

Source Layout Sketch *Draw North Arrow*



AVERAGE OPACITY FOR HIGHEST PERIOD: 0 %	NUMBER OF READINGS ABOVE 5 % WERE 0
RANGE OF OPACITY READINGS: 0% MINIMUM	0% MAXIMUM
OBSERVER'S NAME (PRINT): GREG TERRY	
OBSERVER'S SIGNATURE: [signature]	DATE: 11/18/97
ORGANIZATION: GULF POWER Co	
CERTIFIED BY: ETA	DATE: 5/14/97
VERIFIED BY	DATE

COMMENTS: ONE OF TWO VENTS ON THIS SILO

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS
SIGNATURE
TITLE DATE

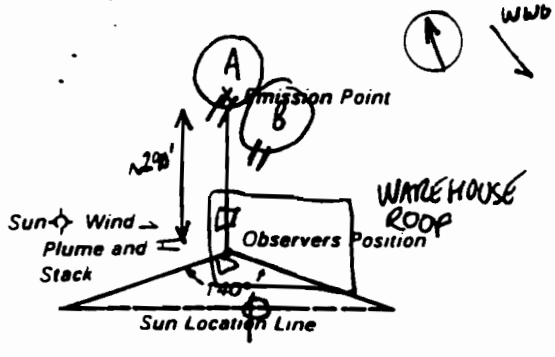
SILO A

VENT S-SOUTH

Visible Emission Observation Form

SOURCE NAME: FLY ASH SILO / PLANT CRIST	OBSERVATION DATE: 11/18/97
ADDRESS: 1999 PATE STREET	START TIME: 1:50 PM
~~P.O. Box~~ ONE ENERGY PLACE	STOP TIME: 2:50 PM CST
CITY: PENSACOLA STATE: FL ZIP: 32520-0310	
PHONE: 473-5900 SOURCE ID NUMBER: A017-23356	
PROCESS EQUIPMENT: FLY ASH COLLECTION OPERATING MODE: NORMAL	
CONTROL EQUIPMENT: BAGHOUSE OPERATING MODE: NORMAL	
DESCRIBE EMISSION POINT: NEAREST, SOUTH-MOST START: VENT OF 2 ON SILO STOP: Same	
HEIGHT ABOVE GROUND LEVEL START ~230' STOP Same	HEIGHT RELATIVE TO OBSERVER START ~75' STOP Same
DISTANCE FROM OBSERVER START ~290' STOP Same	DIRECTION FROM OBSERVER START NNW STOP Same
DESCRIBE EMISSIONS START NONE STOP NONE	
EMISSION COLOR START NONE STOP NONE	PLUME TYPE: CONTINUOUS ☐ FUGITIVE ☐ INTERMITTENT ☐ NONE
WATER DROPLETS PRESENT: NO ☒ YES ☐	IF WATER DROPLET PLUME: ATTACHED ☐ DETACHED ☐
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START AT VENT ERH STOP Same	
DESCRIBE BACKGROUND START WHITE / GREY CLOUDS STOP Same	
BACKGROUND COLOR START LIGHT GREY STOP Same	SKY CONDITIONS START 65% CLOUDS STOP Same
WIND SPEED START LIGHT STOP Same	WIND DIRECTION START Fred NW STOP Same
AMBIENT TEMP START ~60°F STOP Same	WET BULB TEMP — RH, percent —

Source Layout Sketch *Draw North Arrow*



SEC / MIN	0	15	30	45
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2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0
7	0	0	0	0
8	0	0	0	0
9	0	0	0	0
10	0	0	0	0
11	0	0	0	0
12	0	0	0	0
13	0	0	0	0
14	0	0	0	0
15	0	0	0	0
16	0	0	0	0
17	0	0	0	0
18	0	0	0	0
19	0	0	0	0
20	0	0	0	0
21	0	0	0	0
22	0	0	0	0
23	0	0	0	0
24	0	0	0	0
25	0	0	0	0
26	0	0	0	0
27	0	0	0	0
28	0	0	0	0
29	0	0	0	0
30	0	0	0	0

SEC / MIN	0	15	30	45
31	0	0	0	0
32	0	0	0	0
33	0	0	0	0
34	0	0	0	0
35	0	0	0	0
36	0	0	0	0
37	0	0	0	0
38	0	0	0	0
39	0	0	0	0
40	0	0	0	0
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42	0	0	0	0
43	0	0	0	0
44	0	0	0	0
45	0	0	0	0
46	0	0	0	0
47	0	0	0	0
48	0	0	0	0
49	0	0	0	0
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51	0	0	0	0
52	0	0	0	0
53	0	0	0	0
54	0	0	0	0
55	0	0	0	0
56	0	0	0	0
57	0	0	0	0
58	0	0	0	0
59	0	0	0	0
60	0	0	0	0

AVERAGE OPACITY FOR HIGHEST PERIOD: 0 %	NUMBER OF READINGS ABOVE 5 % WERE: 0
RANGE OF OPACITY READINGS: 0% MINIMUM 0% MAXIMUM	
OBSERVER'S NAME (PRINT): GREG TERRY	
OBSERVER'S SIGNATURE: [signature]	DATE: 11/18/97
ORGANIZATION: GULF POWER CO	
CERTIFIED BY: ETA	DATE: 5/14/97
VERIFIED BY:	DATE:

COMMENTS: ONE OF TWO VENTS ON THIS SILO

Fred Stallworth started ash @ 1:40

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS

SIGNATURE

TITLE DATE

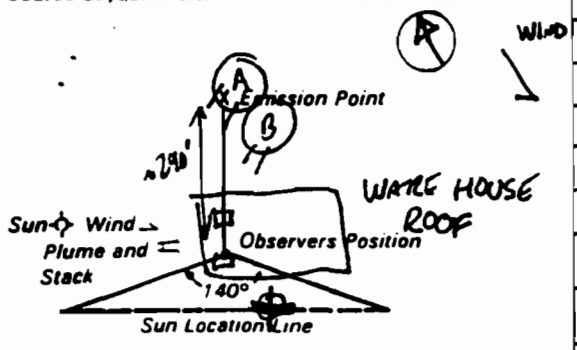
SILO A

VENT N-North

Visible Emission Observation Form

SOURCE NAME: FLY ASH SILO / PLANT CRIST	OBSERVATION DATE: 11/19/97
ADDRESS: 1999 PATE STREET	START TIME: 150PM
~~A0 Box~~ ONE ENERGY PLACE	STOP TIME: 250 PM CST
CITY: PENSACOLA STATE: FL ZIP: 32520-0310	
PHONE: 478-5900 SOURCE ID NUMBER: 1017-234356	
PROCESS EQUIPMENT: FLY ASH COLLECTION OPERATING MODE: NORMAL	
CONTROL EQUIPMENT: BAGHOUSE OPERATING MODE: NORMAL	
DESCRIBE EMISSION POINT: FARTHEST, NORTH-MOST VENT START OF SILO "A" STOP Same	
HEIGHT ABOVE GROUND LEVEL START ~230' STOP same / HEIGHT RELATIVE TO OBSERVER START ~75' STOP Same	
DISTANCE FROM OBSERVER START 210' STOP Same / DIRECTION FROM OBSERVER START NNW STOP Same	
DESCRIBE EMISSIONS START NONE STOP NONE	
EMISSION COLOR START NONE STOP NONE / PLUME TYPE: CONTINUOUS ☐ FUGITIVE ☐ INTERMITTENT ☐ NONE	
WATER DROPLETS PRESENT: NO ☒ YES ☐ / IF WATER DROPLET PLUME: ATTACHED ☐ DETACHED ☐	
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START AT VENT EXIT STOP Same	
DESCRIBE BACKGROUND START WHITE/GREY CLOUDS STOP Same	
BACKGROUND COLOR START LIGHT GREY STOP Same / SKY CONDITIONS START 85% CLOUDS STOP Same	
WIND SPEED START LIGHT STOP Same / WIND DIRECTION START FROM NW STOP Same	
AMBIENT TEMP START ~60°F STOP Same / WET BULB TEMP — / RH, percent —	

Source Layout Sketch *Draw North Arrow*



SEC / MIN	0	15	30	45	SEC / MIN	0	15	30	45
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2	0	0	0	0	32	0	0	0	0
3	0	0	0	0	33	0	0	0	0
4	0	0	0	0	34	0	0	0	0
5	0	0	0	0	35	0	0	0	0
6	0	0	0	0	36	0	0	0	0
7	0	0	0	0	37	0	0	0	0
8	0	0	0	0	38	0	0	0	0
9	0	0	0	0	39	0	0	0	0
10	0	0	0	0	40	0	0	0	0
11	0	0	0	0	41	0	0	0	0
12	0	0	0	0	42	0	0	0	0
13	0	0	0	0	43	0	0	0	0
14	0	0	0	0	44	0	0	0	0
15	0	0	0	0	45	0	0	0	0
16	0	0	0	0	46	0	0	0	0
17	0	0	0	0	47	0	0	0	0
18	0	0	0	0	48	0	0	0	0
19	0	0	0	0	49	0	0	0	0
20	0	0	0	0	50	0	0	0	0
21	0	0	0	0	51	0	0	0	0
22	0	0	0	0	52	0	0	0	0
23	0	0	0	0	53	0	0	0	0
24	0	0	0	0	54	0	0	0	0
25	0	0	0	0	55	0	0	0	0
26	0	0	0	0	56	0	0	0	0
27	0	0	0	0	57	0	0	0	0
28	0	0	0	0	58	0	0	0	0
29	0	0	0		59	0	0	0	0
30	0	0	0	0	60	0	0	0	0

AVERAGE OPACITY FOR HIGHEST PERIOD 0 %

NUMBER OF READINGS ABOVE 5 % WERE 0

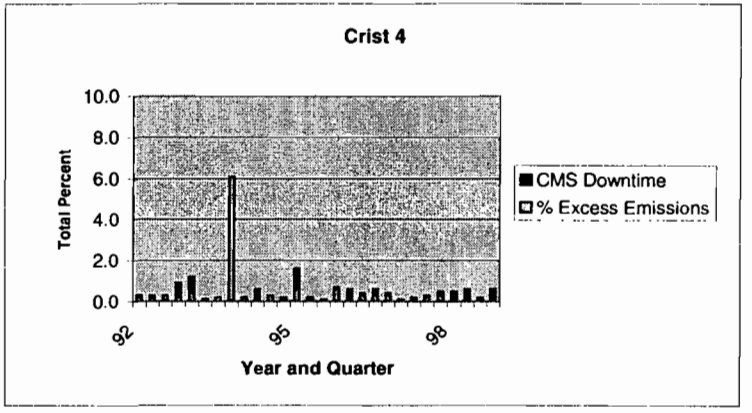
RANGE OF OPACITY READINGS 0 % MINIMUM 0 % MAXIMUM

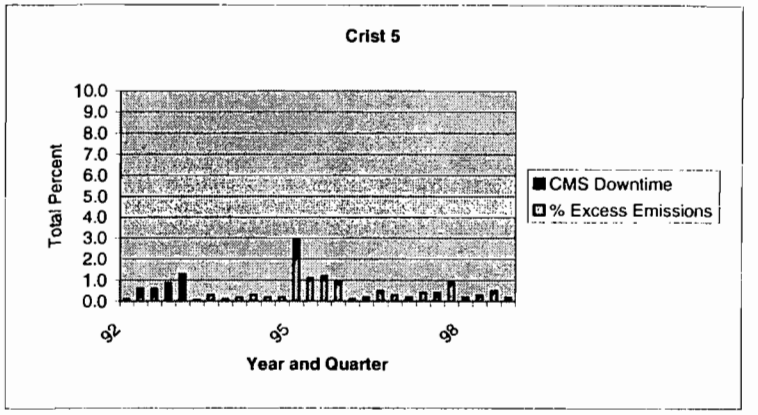
OBSERVER'S NAME (PRINT) GREG TERRY

COMMENTS: ONE OF TWO VENTS ON THIS SILO	OBSERVER'S SIGNATURE: [signature] DATE: 11/18/97
	ORGANIZATION: GULF POWER CO
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE	CERTIFIED BY: ETA DATE: 5/14/97
TITLE / DATE	VERIFIED BY / DATE

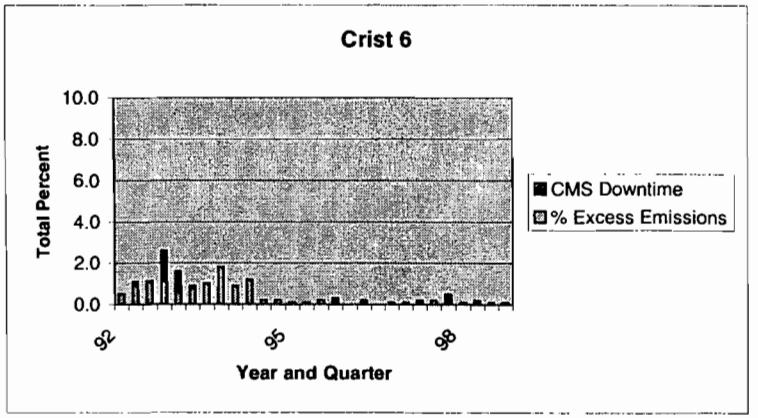
Opacity Excess Emissions Report for Crist (1992-1997)

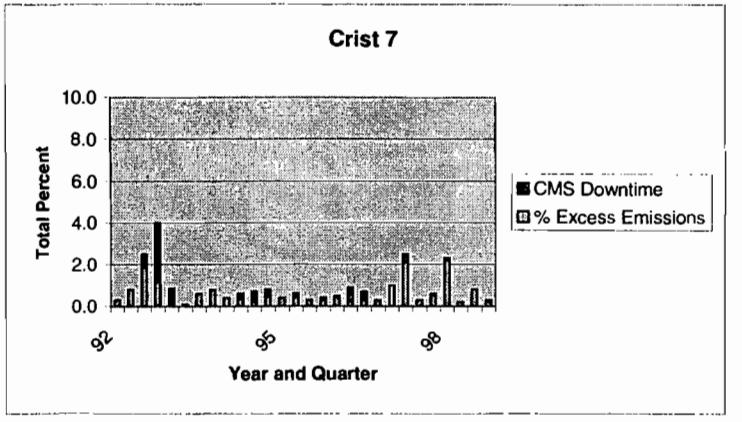
Year		92				93				94				95				96				97				98				5 Year Avg. [1]
Quarter		1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	
Crist 4	% Excess emissions	0.2	0.2	0.3	0.2	0.4	0.1	0.2	6.1	0.2	0.1	0.3	0.2	0.6	0.1	0.0	0.6	0.1	0.3	0.3	0.3	0.0	0.1	0.2	0.3	0.1	0.0	0.1	0.1	0.2
	% CMS Downtime	0.1	0.1	0.0	0.7	0.8	0.1	0.0	0.0	0.0	0.5	0.0	0.0	1.0	0.1	0.1	0.1	0.5	0.1	0.3	0.1	0.1	0.1	0.1	0.2	0.4	0.6	0.1	0.5	0.2
	Total Percent	0.3	0.3	0.3	0.9	1.2	0.1	0.2	6.1	0.2	0.6	0.3	0.2	1.6	0.2	0.1	0.7	0.6	0.4	0.6	0.4	0.1	0.2	0.3	0.5	0.5	0.6	0.2	0.6	0.4
Crist 5	% Excess emissions	0.1	0.2	0.2	0.1	0.0	0.1	0.3	0.1	0.2	0.3	0.2	0.2	2.0	1.0	1.0	0.8	0.1	0.1	0.4	0.3	0.1	0.4	0.2	0.8	0.1	0.2	0.4	0.0	0.4
	% CMS Downtime	0.0	0.4	0.4	0.8	1.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	0.1	0.2	0.1	0.0	0.1	0.1	0.0	0.1	0.0	0.2	0.1	0.1	0.1	0.1	0.2	0.1
	Total Percent	0.1	0.6	0.6	0.9	1.3	0.1	0.3	0.1	0.2	0.3	0.2	0.2	3.0	1.1	1.2	0.9	0.1	0.2	0.5	0.3	0.2	0.4	0.4	0.9	0.2	0.3	0.5	0.2	0.6
Crist 6	% Excess emissions	0.5	0.9	1.1	1.1	0.6	0.8	1.0	1.8	0.9	1.2	0.2	0.2	0.1	0.1	0.2	0.1	0.0	0.1	0.0	0.1	0.1	0.1	0.2	0.1	0.1	0.1	0.0	0.1	0.2
	% CMS Downtime	0.0	0.2	0.0	1.5	1.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.1	0.0	0.0	0.0	0.1	0.0	0.4	0.0	0.1	0.1	0.0	0.1
	Total Percent	0.5	1.1	1.1	2.6	1.6	0.9	1.0	1.8	0.9	1.2	0.2	0.2	0.1	0.1	0.2	0.3	0.0	0.2	0.0	0.1	0.1	0.2	0.2	0.5	0.1	0.2	0.1	0.1	0.3
Crist 7	% Excess emissions	0.3	0.8	1.9	1.2	0.1	0.1	0.6	0.8	0.4	0.4	0.2	0.5	0.4	0.5	0.3	0.3	0.4	0.2	0.3	0.3	1.0	2.1	0.3	0.5	2.2	0.2	0.8	0.2	0.6
	% CMS Downtime	0.0	0.0	0.6	2.8	0.8	0.0	0.0	0.0	0.0	0.2	0.5	0.3	0.0	0.1	0.0	0.1	0.1	0.7	0.4	0.0	0.0	0.4	0.0	0.1	0.1	0.0	0.0	0.1	0.2
	Total Percent	0.3	0.8	2.5	4.0	0.9	0.1	0.6	0.8	0.4	0.6	0.7	0.8	0.4	0.6	0.3	0.4	0.5	0.9	0.7	0.3	1.0	2.5	0.3	0.6	2.3	0.2	0.8	0.3	0.7





* High percentage for Crist 4 in 4th Quarter 1993 due to short running time due to outage



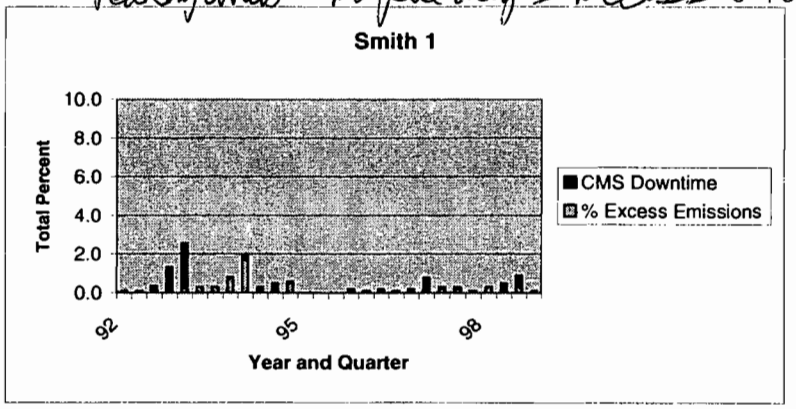


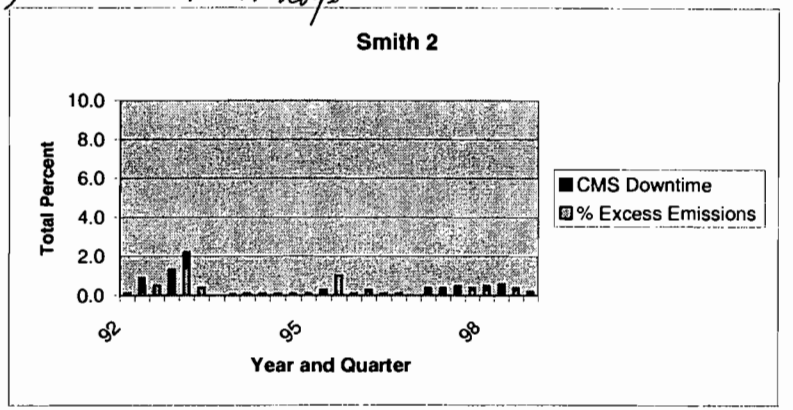
Includes startup & Shutdown

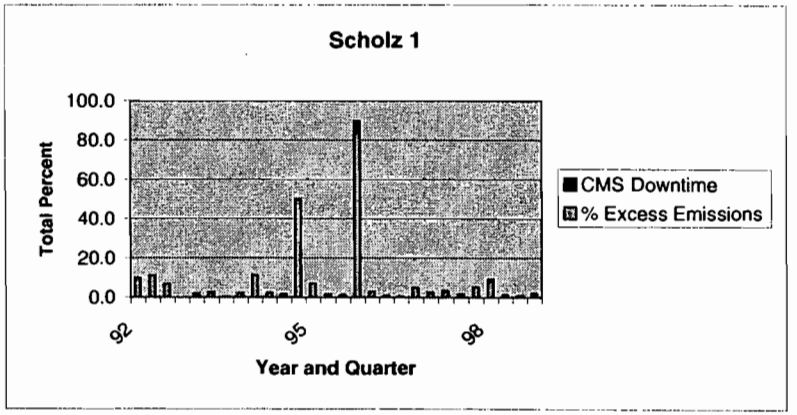
Opacity Excess Emissions Report for Smith and Scholz (1992-1997)

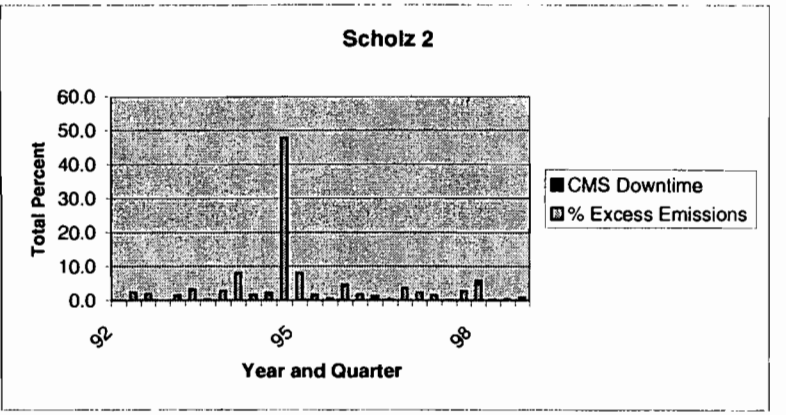
Year		92				93				94				95				96				97				98				
Quarter		1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	5 Year Avg.
Smith 1	% Excess emissions	0.1	0.1	0.0	0.0	0.3	0.3	0.3	0.8	1.7	0.2	0.0	0.5	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.1	0.1	0.2	0.2	0.0	0.3	0.2	0.3	0.0	0.2
	% CMS Downtime	0.0	0.0	0.3	1.3	2.3	0.0	0.0	0.0	0.2	0.1	0.5	0.1	0.0	0.0	0.0	0.1	0.1	0.1	0.1	0.1	0.7	0.1	0.1	0.1	0.0	0.3	0.6	0.1	0.2
	Total Percent	0.1	0.1	0.3	1.3	2.6	0.3	0.3	0.8	1.9	0.3	0.5	0.6	0.0	0.0	0.0	0.2	0.1	0.2	0.1	0.2	0.8	0.3	0.3	0.1	0.3	0.5	0.9	0.1	0.4
Smith 2	% Excess emissions	0.1	0.2	0.5	0.0	1.4	0.4	0.0	0.1	0.1	0.0	0.1	0.0	0.1	0.1	1.0	0.0	0.2	0.0	0.1	0.0	0.1	0.0	0.1	0.3	0.3	0.1	0.3	0.1	0.2
	% CMS Downtime	0.0	0.7	0.0	1.3	0.8	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.2	0.0	0.1	0.1	0.1	0.0	0.0	0.3	0.4	0.4	0.1	0.2	0.5	0.1	0.1	0.1
	Total Percent	0.1	0.9	0.5	1.3	2.2	0.4	0.0	0.1	0.1	0.1	0.1	0.1	0.1	0.3	1.0	0.1	0.3	0.1	0.1	0.0	0.4	0.4	0.5	0.4	0.5	0.6	0.4	0.2	0.3
Scholz 1	% Excess emissions	9.8	11.1	6.8	N/A	1.7	2.4	0.3	2.2	11.3	2.3	1.8	50.0	7.2	1.7	1.0	83.6	3.0	0.8	0.5	5.1	2.7	3.3	1.7	5.3	8.4	1.3	1.0	2.0	9.7
	% CMS Downtime	0.0	0.0	0.0	N/A	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	6.1	0.0	0.2	0.1	0.0	0.0	0.1	0.1	0.0	0.9	0.1	0.0	0.2	0.4
	Total Percent	9.8	11.1	6.8	N/A	1.9	2.4	0.3	2.2	11.3	2.3	1.8	50.0	7.2	1.7	1.1	89.7	3.0	1.0	0.6	5.1	2.7	3.4	1.8	5.3	9.3	1.4	1.0	2.2	10.1
Scholz 2	% Excess emissions	0.0	2.4	1.9	N/A	1.2	3.3	0.3	2.8	8.1	1.7	2.1	47.8	8.1	1.6	0.5	4.1	1.7	1.0	0.2	3.6	2.3	1.4	0.1	2.8	4.9	0.2	0.3	0.8	4.7
	% CMS Downtime	0.0	0.0	0.0	N/A	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.6	0.1	0.2	0.1	0.0	0.0	0.1	0.0	0.0	0.9	0.1	0.1	0.1	0.1
	Total Percent	0.0	2.4	1.9	N/A	1.5	3.3	0.3	2.8	8.1	1.7	2.1	47.8	8.1	1.6	0.5	4.7	1.8	1.2	0.3	3.6	2.3	1.5	0.1	2.8	5.8	0.3	0.4	0.9	4.8

Peaking Units maybe only 2 weeks at a time, 20 hours + startup





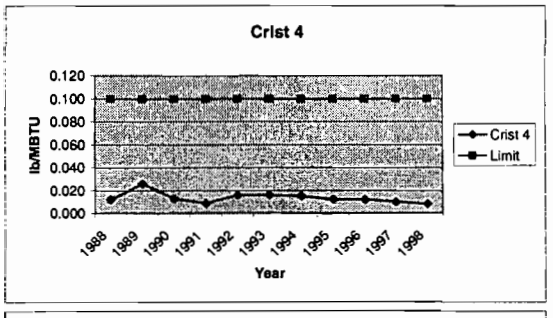


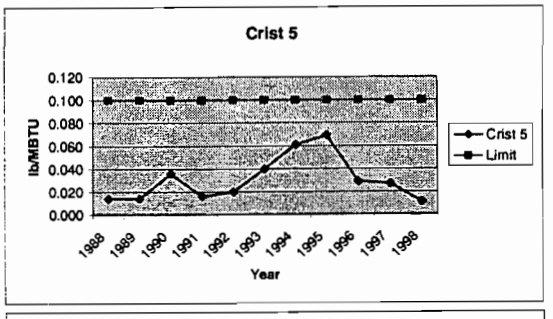


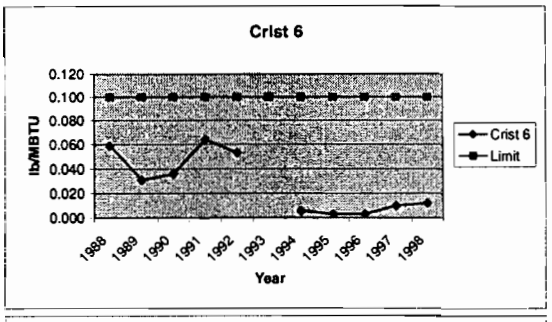
*High Scholz Percentages due to low source operating time; peaking units only.

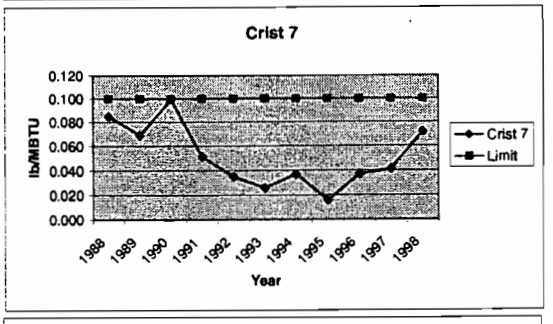
Gulf Power Emissons Summary for Steady State Particulate Emissions
(in lb/MBTU)

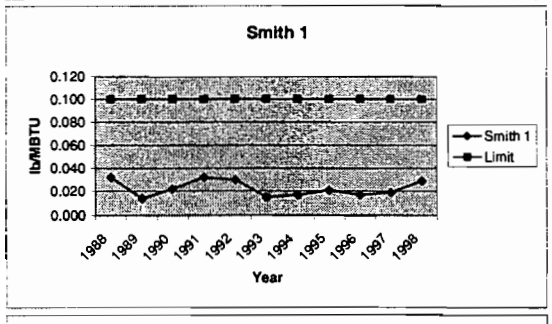
Unit	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	5 Year Avg
Limit	0.100	0.100	0.100	0.100	0.100	0.100	0.100	0.100	0.100	0.100	0.100	0.100
Crist 4	0.012	0.026	0.013	0.009	0.016	0.016	0.015	0.012	0.012	0.010	0.008	0.011
Crist 5	0.014	0.014	0.036	0.016	0.020	0.040	0.061	0.069	0.029	0.027	0.011	0.039
Crist 6	0.059	0.031	0.036	0.064	0.053		0.006	0.003	0.003	0.010	0.012	0.007
Crist 7	0.085	0.069	0.099	0.051	0.035	0.026	0.037	0.016	0.037	0.041	0.072	0.041
Smith 1	0.032	0.014	0.022	0.032	0.030	0.015	0.017	0.021	0.017	0.019	0.029	0.021
Smith 2	0.013	0.038	0.027	0.050	0.034	0.006	0.021	0.015	0.028	0.025	0.049	0.028
Scholz 1	0.011	0.008	0.011	0.038	0.011	0.008	0.018	0.023	0.035	0.024	0.016	0.023
Scholz 2	0.015	0.015	0.011	0.041	0.009	0.011	0.020	0.013	0.016	0.013	0.010	0.014

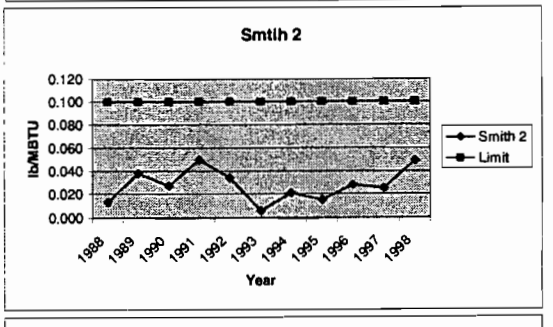


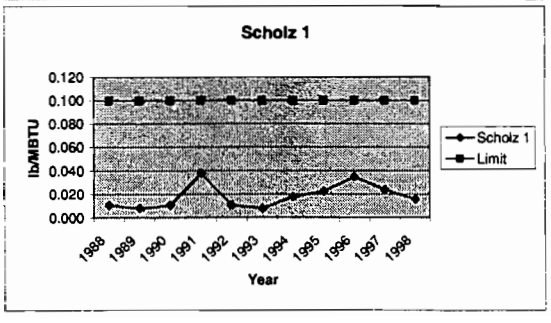


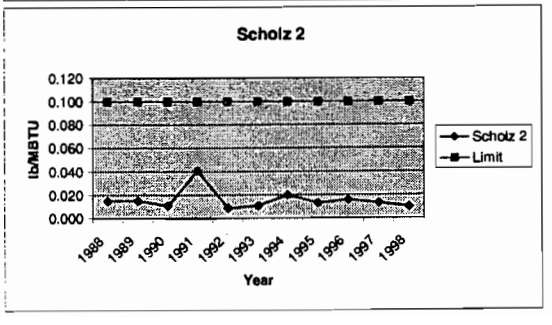






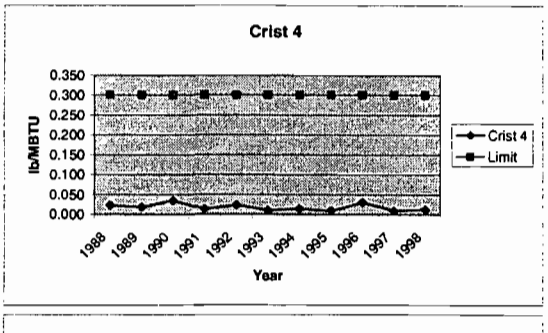


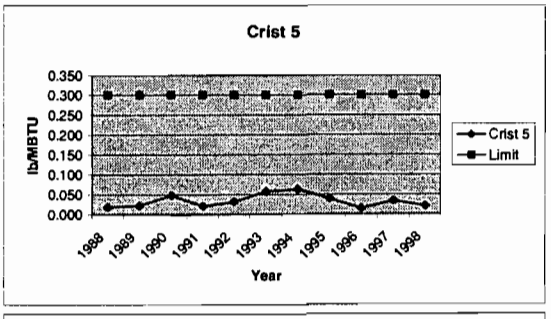


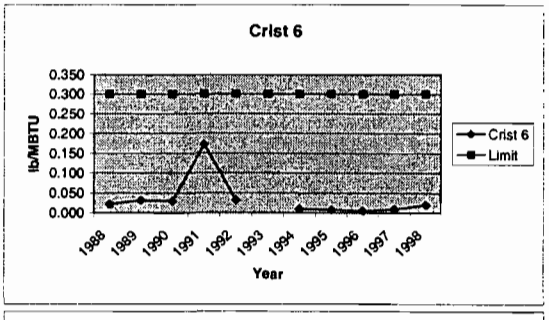


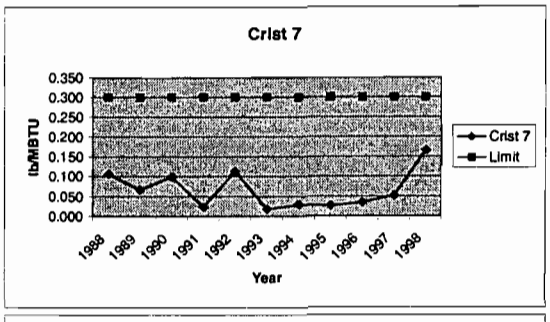
Gulf Power Emissons Summary for Soot Blowing Particulate Emissions (in lb/MBTU)

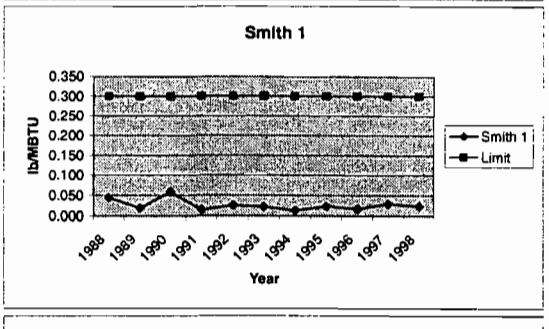
Unit	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	5 Year Avg
Limit	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300
Crist 4	0.023	0.019	0.035	0.014	0.024	0.011	0.015	0.009	0.031	0.010	0.013	0.016
Crist 5	0.019	0.023	0.048	0.021	0.032	0.058	0.064	0.039	0.015	0.034	0.021	0.035
Crist 6	0.022	0.032	0.030	0.172	0.032		0.010	0.008	0.005	0.009	0.020	0.010
Crist 7	0.106	0.067	0.099	0.024	0.113	0.018	0.029	0.027	0.035	0.053	0.166	0.062
Smith 1	0.044	0.019	0.059	0.015	0.025	0.022	0.013	0.024	0.017	0.029	0.024	0.021
Smith 2	0.016	0.037	0.053	0.031	0.025	0.009	0.019	0.016	0.050	0.040	0.028	0.031
Scholz 1	0.012	0.011	0.016	0.021	0.015	0.013	0.035	0.014	0.035	0.054	0.025	0.033
Scholz 2	0.013	0.009	0.013	0.029	0.016	0.008	0.044	0.016	0.018	0.014	0.018	0.022

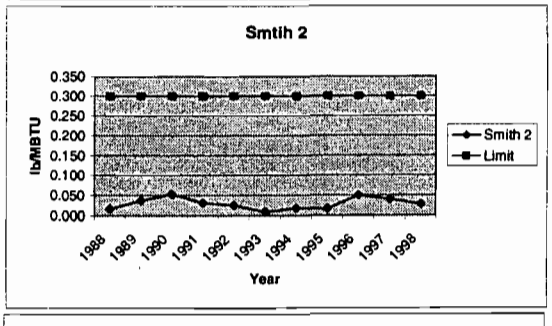


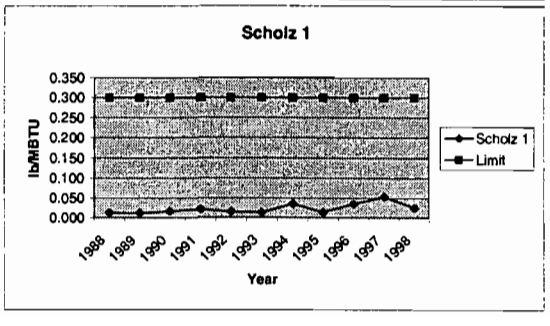


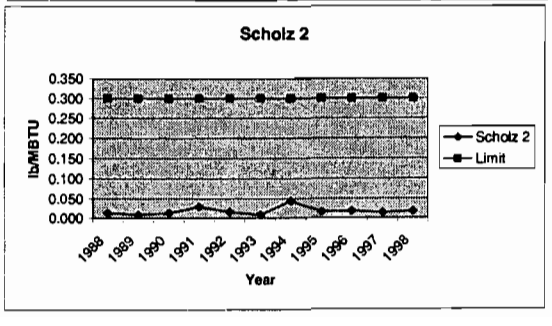












7952808512

MATERIAL SAFETY DATA SHEET

1 CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name:	GAM-60	Manufacturer:	Benetech, Inc.
Grades:	Technical		1750 Eastwood Drive
Chemical Formula:	Mixture (refer to Section 2)		Aurora, IL 60506
Chemical Name/Synonyms.	Mixture (refer to Section2)		
Chemical Family:	Inorganic Borates	Emergency Phone Numbers:	
		24 Hr. Info. Service:	(800) 843-2625
		CHEMTREC:	(800) 424-9300

2 COMPOSITION/INFORMATION OF INGREDIENTS' OSHA HAZARDS

If present, IARC, NTP and OSHA carcinogens and chemicals subject to the reporting requirements of SARA Title III Section 313 are identified in this section.

Ingredient Name	CAS Number	%(by WT)
Sodium Tetraborate Pentahydrate	#12179-043-3	>85%
Disodium Octaborate Tetrahydrate	#12280-03-4	>10%
Sodium Sulfate	#7757-82-6	<2%

~ .45% S

3 HAZARD IDENTIFICATION

EMERGENCY OVERVIEW:

GAM-60 is a white odorless, granular substance that is not flammable, combustible, or explosive, and it presents no unusual hazard if involved in a fire. GAM-60 presents little or no hazard (to humans) and has low acute oral and dermal toxicities. Care should be taken not to exceed recommended application rates for GAM-60 to avoid adverse ecological effects.

POTENTIAL ECOLOGICAL EFFECTS:

Routes of Exposure: Inhalation is the most significant route of exposure in occupational and other setting Dermal exposure is not usually a concern because GAM-j60 is not absorbed through intact skin.

Inhalation: Occasional mild irritation effects to nose and throat may occur from inhalation of GAM-60 dusts at levels greater than 10 mg/m^3.

Eye Contact: GAM-60 may cause eye irritation. Avoid contact with eyes.

Skin Contact: GAM-60 does not cause irritation to intact skin.

Ingestion: Products containing GAM-60 are not intended for ingestion. GAM-60 has a relatively low acute toxicity. Small amounts (e.g. a teaspoonful) swallowed accidently is not likely to cause effects; swallowing amounts larger than that may cause gastrointestinal symptoms.

Eye Contact: GAM-60 may cause eye irritation. Avoid contact with eyes.

Skin Contact: GAM-6- does not cause irritation to intact skin.

Ingestion: Products containing GAM-60 are not intended for ingestion. GAM-60 has a relatively low acute toxicity. Small amounts (e.g. a teaspoonful) swallowed accidentally is not likely to cause effects; swallowing amounts larger than that may cause gastrointestinal symptoms.

Cancer: GAM-60 is not considered a carcinogen.

Reproductive: Long-term, high dose animal ingestion studies have demonstrated reproductive effects in male animals. A human study of occupational exposure to borate dust showed no adverse affect to reproduction.

Developmental: High dose animal ingestion studies have demonstrated developmental effects in fetuses of pregnant animals, including fetal weight loss.

GAM-60 is non-hazardous waste when spilled or disposed of, as defined in the Resource Conservation and Recovery Act (RCRA) regulations (40 CFR 261). (Refer to Regulatory Information Section 15 for additional references and information regarding EPA and California regulations.)

7 HANDLING AND STORAGE

Storage Temperature: Ambient

Storage Pressure: Atmospheric

Special Sensitivity: Moisture (Caking)

General: Avoid contact with eyes and wash thoroughly after handling. Dry indoor storage is recommended. To maintain package integrity and to minimize caking of the product, bags should be handled on a "first-in first-out" basis. Good housekeeping procedures should be followed to minimize dust generation and accumulation.

8 EXPOSURE CONTROLS/PERSONAL PROTECTION

Engineering Controls: Use local exhaust ventilation to keep airborne concentrations of GAM-60 dust below permissible exposure levels.

Personal Protection: Where airborne concentrations are expected to exceed exposure limits, NIOSH/MSHA certified respirators must be used. Eye goggles and gloves are recommended, especially in excessively dusty environments.

Occupational Exposure Limits: GAM-60 is listed/regulated by OSHA, Cal OSHA and ACGIH as "Particulate Note Otherwise Classified" or "Nuisance Dust"."

OSHA; PEL* - 15 mg/m^3 total dust and 5 mg/m^3 respirable dust

ACGIH; TLV** - 5 mg/m^3

Cal OSHA; PEL* - 5 mg/m^3

*PEL = "Permissible Exposure Limit"

**TLV = "Threshold Limit Value"

9 PHYSICAL AND CHEMICAL PROPERTIES

Appearance:	White, odorless, granular solid
Specific Gravity:	1.75 (5 Mol is 1.81)
Vapor Pressure:	Negligible at 20°C
Viscosity:	Not applicable
Boiling Point:	Not applicable
Flash Point:	None
pH:	9.15 (3.0% solution) at 20°C

10 STABILITY AND REACTIVITY

General: GAM-60 is a stable product.

Incompatible Materials and Conditions to Avoid: Reaction with strong reducing agents such as metal hydrides or alkali metals with generate hydrogen gas which could create an explosive hazard

Hazardous Decomposition: None

11 TOXICOLOGICAL INFORMATION

INGESTION (ACUTE ORAL TOXICITY): Low acute oral toxicity; LD_{50} of GAM-60 in rats is expected to be approximately 5000 mg/kg of body weight based on results from similar borate chemicals

SKIN (ACUTE DERMAL TOXICITY): Low acute dermal toxicity; LD_{50} of GAM-60 in rabbits is greater than 2000 mg/kg body weight.

PRIMARY SKIN IRRITATION INDEX: Expected to be 0 (zero), No effect.

EYE: Draize test in rabbits produced eye corrosive irritation effects. Many years of occupational exposure history reflect no indication of human eye injury from exposure to GAM-60.

NOTE GAM-60 is chemically and toxicologically similar to the common borate chemical, Boric Acid The majority of the borate chronic toxicology studies were conducted on Boric Acid. The Boric Acid data discussed in this section can be converted to GAM-60 equivalent data by dividing by a factor of 0.8171.

INHALATION: Human epidemiological studies show no increase in pulmonary disease in occupational populations with chronic exposures to Boric Acid dust and Sodium Borate dust.

CARCINOGENICITY: A Technical Report issued by the National Toxicology Program showed "no evidence of CARCINOGENICITY" from a full 2-year bioassay on Boric Acid in mice at feed doses of 2500 and 5000 ppm in the diet. No mutagenic activity was observed for Boric Acid in a recent battery of four short-term mutagenicity assays

REPRODUCTIVE/DEVELOPMENTAL TOXICITY: Animal studies indicate Boric Acid reduces or inhibits sperm production, causes testicular atrophy, and, when given to pregnant animals during gestation, may cause developmental changes. These feed studies were conducted under chronic exposure conditions leading to doses many times in excess of those that could occur through inhalation of dust in occupational settings.

REPRODUCTIVE TOXICITY (Fertility): Dietary Boric Acid levels of 6,700 ppm in chronic feeding studies in rats and dogs produced testicular atrophy, while dogs and rats receiving 2,000 ppm did not develop testicular changes (Weir, Fisher, 1972). In chronic feeding studies of mice on diets containing 5,000 ppm (550 mg/kg/d) Boric Acid, testicular atrophy was present, while mice fed 2,500 ppm (275 mg/kg/d) Boric

Acid showed no significant increase in testicular atrophy [3NTP, 1987]. In another Boric Acid chronic study, in mice given 4,500 ppm (636 mg/kg/d), degeneration of seminiferous tubules was present together with a reduction of germ cells, while at 1,000 ppm (152 mg/kg/d) no effect was seen [5Fail et al., 1991].

In a reproduction study on rats, 2,000 ppm of dietary Boric Acid had no adverse effect on lactation, litter size, weight and appearnce [1 Weir, Fisher, 1972]. In a continuous breeding study in mice there was a reduction in fertility rates for males receiving 4,500 ppm (636 mg/kg/d) Boric Acid, but not for females receiving 4,500 ppm Boric Acid [5Fail et al., 1991].

Developmental Toxicity: Boric Acid at dietary levels of 1000 ppm (78 mg/kg/d) administered to pregnant female rats throughout gestation caused a slight reduction in fetal weight, but was considered to be close to the NOAEL.

Doses of 2,000 ppm (163 mg/kg/d) and above caused fetal malformations and maternal toxicity. In mice the no effect level for fetal weight reduction and maternal toxicity was 1,000 ppm (248 mg/kg/d) Boric Acid. Fetal weight loss was noted at dietary Boric Acid levels of 2,000 ppm (152 mg/kg/d) and above. Malformations (agenesis or shortening of the thirteenth rib) were seen at 4,000 ppm (1003 mg/kg/d), [6Heindel et al., 1992].

1 [Weir, R.J. and Fisher, R.S. Toxicol. Appl. Pharmacol., 23:341-362 (1972)]

3 [National Toxicology Program (NTP) - Technical Report Series No TR324, NIH Publication No 88-2480 (1987), PB88-21475/XAB)]

5 [Fail et al., Fund. Appl. Toxicol, 17, 225-239 (1991)]

6 [Heindel et al., Fund. Appl. Toxicol, 18, 226-277 (1992)]

12 ECOLOGICAL INFORMATION

ECOTOXICITY DATA:

Phytotoxicity: Although boron is an essential micronutrient for healthy growth of plants, it can be harmful to boron sensitive plant in higher quantities. Plants and trees can easily be exposed by root absorption to toxic levels of boron in the form of water-soluble borate leached into nearby soil or waters Care should be taken not to exceed recommendation application rates.

Fish Toxicity: Boron naturally occurs in seawater at an average concentration of 5 mg B/liter. In laboratory studies the acute toxicity (96-hr LC_{50}) for under-yearling Cobo salmon (Onchorhynchus kisutch) in seawater was determined as 40 mg B/L (added as sodium metaborate).

Boron concentrations in fresh surface water are generally less than 1 mg B/L. Laboratory studies on the toxicity of freshwater fish were determined using early life (embryolarval) stages in natural water and Boric Acid as a test substance. The results were.

Rainbow Trout (S. Gairdneri)
- 24 - day LC_{50} = 150.0 mg B/L
- 36 - day NOEC-LOEC = 0.75 mg B/L

Goldfish (Carassius Auratus)
- 7 - day NOEC-LOEC = 26.50 B/L
- 3 - day LC_{50} = 178 mg B/L

Invertebrate Toxicity: The acute toxicity (48-hour LC_{50}) to Daphnids (Daphnia magna Straus) in natural water is reported to be 133 mg B/L (added as Boric Acid). Estimated chronic toxicity (21-day NOEC-LOEC) values of 6 - 13 mg B/L (added as Boric Acid) have also been reported.

ENVIRONMENTAL FATE DATA:

Persistence/Degradation: Boron is naturally occurring and ubiquitous in the environment. GAM-60 decomposes in the environment to natural borate.

Soil Mobility: The product is soluble in water and is leachable through normal soil.

NOTE: Boron (B) is the element in GAM-60 which is used to characterize borate product ecological effects. To convert GAM-60 data to Boron (B), multiply by 0.143.

13 DISPOSAL CONSIDERATIONS

Disposal Guidance: Small quantities of GAM-60 can usually be disposed of at Municipal Landfill sites. No special disposal treatment is required, but refer to state and local regulations for applicable site-specific requirements. Tonnage quantities of product are not recommended to be sent to landfills. Such product should, if possible, be re-used for an appropriate application.

RCRA (40 CRF 261): GAM-60 is not listed under any sections of the Federal Resource Conservation and Recovery Act (RCRA).

California Hazardous Waste Designation: California identifies substances with acute LD_{50}'s less than 5,000 mg/kg as "hazardous wastes". GAM-60 may therefore be a "hazardous waste" if spilled in California, and should be handled in accordance with applicable state regulations.

Refer to Section 15 for additional regulatory information.

14 TRANSPORT INFORMATION

DOT Hazardous Material Classification: GAM-60 is not a U.S. Department of Transportation (DOT) Hazardous Material.

DOT Hazardous Substances Classification: GAM-60 is not a DOT Hazardous Substance.

International Transportation: GAM-60 has no U.N. Number, and is not regulated under international rail, highway, water or air transport regulations.

15 REGULATORY INFORMATION

TSCA No.: The major components of GAM-60 appear on the TSCA Inventory list under the CAS numbers representing the anhydrous forms of the inorganic borate salts Sodium Tetraborate (CAS No. 1330-43-4) and Disodium Octaborate (CAS No. 12006-41-2).

RCRA: GAM-60 is not listed as a hazardous waste under any sections of the Resource Conservation and Recovery Act of regulations (40 CFR 261 et seq.).

Superfund: CERCLA/SARA. GAM-60 is not listed under CERCLA (the Comprehensive Environmental Response Compensation and Liability Act) or its 1986 amendments, SARA, (the Superfund Amendments and Reauthorization Act), including substances listed under Section 313 of SARA, Toxic Chemicals, 42 USC 11023, 40 CFR 372.65; Section 302 of SARA, Extremely Hazardous Substances, 42 USC 11002, 40 CFR 355; or the CERCLA Hazardous Substances list, 42 USC 9604, 40 CFR 302.

Safe Drinking Water Act: GAM-60 is not regulated under the SDWA, 42 USC 300g-1, 40 CFR 141 et seq. Consult state and local regulations for possible water quality advisories regarding boron.

Clean Water Act (Federal Water Pollution Control Act):

33 USC 1251 et seq.

a. GAM-60 is not itself a discharge covered by any water quality criteria of Section 304 of the CWA, 33 USC 1314.

b. It is not on the Section 307 List of Priority Pollutants, 33 USC 1317, 40 CFR 116.

c. It is not on the Section 311 List of Hazardous Substances, 33 USC 1321, 40 CFR 116.

OSHA/Cal OSHA: This MSDS document meets the requirements of both OSHA (29 CFR 1910, 1200) and Cal OSHA (Title 8 ccr 5194(g)) hazard communication standards. Refer to Section 8 for regulatory exposure limits.

IARC: The International Agency for Research on Cancer (of the World Health Organization) does not list or categorize GAM-60 as a carcinogen.

NTP Annual Report on Carcinogens: GAM-60 is not listed.

OSHA Carcinogen: GAM-60 is not listed.

California Proposition 65: Gam-60 is not listed on any Proposition 65 lists of carcinogens or reproductive toxicants.

16 OTHER INFORMATION

Product Label Text Hazard Information

- May be harmful if swallowed.
- May cause eye irritation
- May cause reproductive harm or birth defects based on animal data.
- Avoid contamination of food or feed.
- Not for food, drug or pesticide use.
- Refer to MSDS.
- KEEP OUT OF REACH OF CHILDREN

National Fire Protection Associate (NFPA) Classification:

Health	0
Flammability	0
Reactivity	0

Hazardous Materials Information Systems (HMIS):

Red: (Flammability)	0
Yellow: (Reactivity)	0
Blue. (Acute Health)	1*

* Chronic Effects

Revision Date 7/7/95

TABLE I. SUMMARY OF PARTICULATE TEST RESULTS
GULF POWER COMPANY
PLANT CRIST, UNIT 5
SOOT BLOWING

Title of Run		RUN 1	RUN 2	RUN 3
Date of Test	Month/Day/Year	3/9/99	3/9/99	3/9/99
Sampling Time -Start	Military	0839	1049	1208
Sampling Time -Stop	Military	0943	1153	1312
Oxygen F Factor	SDCF/MMBTU	9780	9780	9780
Stack Static Pressure	Inches Water	-0.44	-0.44	-0.44
Barometric Pressure	Inches Mercury	30.10	30.10	30.10
Average Orifice Pressure (ΔH)	Inches Water	1.6	1.7	1.9
Meter Correction Factor		1.007	1.007	1.007
Average Meter Temperature	Degrees F	70.2	80.2	86.7
Oxygen Concentration	Percent O2	6.1	5.6	5.9
Carbon Dioxide Concentration	Percent CO2	12.5	12.5	12.5
Volume of Gas Metered	Cubic Feet	43.300	44.715	47.500
Volume of Water Collected	Milliliters	81.5	93.0	87.5
Sampling Time	Minutes	64	64	64
Nozzle Diameter	Inches	0.248	0.252	0.255
Average Stack Temperature	Deg. F	299.2	306.5	309.3
Area of Stack	Square Feet	92.1350	92.1350	92.1350
Weight of Solids Collected	Milligrams	99.6	17.4	28.8
Number of Points Sampled		32	32	32
Avg. Sqr. Root Velocity Press.	Inches Water	0.7958	0.7866	0.8056

RESULTS OF COMPUTATIONS

		RUN 1	RUN 2	RUN 3	Average
Volume of Gas Sampled	Standard Dry Cubic Feet	43.833	44.441	46.671	
Molecular Wt. of Stack Gas	LB/LB-MOLE	29.259	29.128	29.244	29.210
Water vapor in Stack Gas	Percent	8.0	9.0	8.1	8.4
Average Stack Gas Velocity	Feet per second	53.1	52.8	54.1	53.3
Stack Gas Flow Rate	Standard Dry Cubic Feet Per Minute	188,610	184,082	189,599	187,430
Stack Gas Flow Rate	Actual Cubic Feet Per Minute	293,480	292,114	299,131	294,908
Stack Gas Flow Rate	Pounds Dry Air per Hour	850,999	830,571	855,465	845,678
Particulate Concentration	Grains per Standard Dry Cubic Foot	0.035	0.006	0.010	0.017
Particulate Concentration	Grains per Actual Cubic Foot	0.022	0.004	0.006	0.011
Particulate Emission Rate	Pounds per Hour	56.6	9.5	15.4	27.2
Particulate Emission Rate	Pounds per Million Btu (O2 F Factor)	0.069	0.012	0.018	0.033
Heat Input (O2 F Factor)	Million Btu per Hour	819.39	826.74	834.82	826.99
Isokinetic Rate	Percent	99.8	100.4	100.0	

TABLE I. SUMMARY OF PARTICULATE TEST RESULTS
GULF POWER COMPANY
PLANT CRIST, UNIT 5
STEADY STATE

Title of Run		RUN 1	RUN 2	RUN 3
Date of Test	Month/Day/Year	3/10/99	3/10/99	3/10/99
Sampling Time -Start	Military	0839	1019	1202
Sampling Time -Stop	Military	0943	1123	1306
Oxygen F Factor	SDCF/MMBTU	9780	9780	9780
Stack Static Pressure	Inches Water	-0.75	-0.75	-0.75
Barometric Pressure	Inches Mercury	30.19	30.19	30.19
Average Orifice Pressure (ΔH)	Inches Water	1.3	1.4	1.5
Meter Correction Factor		1.007	1.007	1.007
Average Meter Temperature	Degrees F	62.0	69.1	73.6
Oxygen Concentration	Percent O2	4.7	4.8	4.7
Carbon Dioxide Concentration	Percent CO2	13.5	13.0	12.5
Volume of Gas Metered	Cubic Feet	39.000	40.920	41.850
Volume of Water Collected	Milliliters	71.0	85.5	84.5
Sampling Time	Minutes	64	64	64
Nozzle Diameter	Inches	0.248	0.252	0.255
Average Stack Temperature	Deg. F	283.0	289.3	294.0
Area of Stack	Square Feet	92.1350	92.1350	92.1350
Weight of Solids Collected	Milligrams	28.5	18.8	19.2
Number of Points Sampled		32	32	32
Avg. Sqr. Root Velocity Press.	Inches Water	0.7161	0.7282	0.7469

RESULTS OF COMPUTATIONS

		RUN 1	RUN 2	RUN 3	Average
Volume of Gas Sampled	Standard Dry Cubic Feet	40.189	41.613	42.214	
Molecular Wt. of Stack Gas	LB/LB-MOLE	29.400	29.190	29.139	29.243
Water vapor in Stack Gas	Percent	7.7	8.8	8.6	8.4
Average Stack Gas Velocity	Feet per second	47.1	48.3	49.7	48.4
Stack Gas Flow Rate	Standard Dry Cubic Feet Per Minute	172,027	172,676	177,103	173,935
Stack Gas Flow Rate	Actual Cubic Feet Per Minute	260,326	266,814	274,764	267,301
Stack Gas Flow Rate	Pounds Dry Air per Hour	776,179	779,105	799,080	784,788
Particulate Concentration	Grains per Standard Dry Cubic Foot	0.011	0.007	0.007	0.008
Particulate Concentration	Grains per Actual Cubic Foot	0.007	0.005	0.005	0.005
Particulate Emission Rate	Pounds per Hour	16.1	10.3	10.6	12.3
Particulate Emission Rate	Pounds per Million Btu (O2 F Factor)	0.020	0.013	0.013	0.015
Heat Input (O2 F Factor)	Million Btu per Hour	818.05	816.06	842.18	825.43
Isokinetic Rate	Percent	100.3	100.2	96.8	

matter emission limit of 0.3 lb/MMBtu would be equivalent to 0.349 lb/MMBtu. However, these statements are incorrect. A measured emission rate of 0.149 lb/MMBtu actually rounds to 0.15 lb/MMBtu rather than 0.1 lb/MMBtu, which is in excess of the emission limit, and therefore not allowable.

According to the June 6, 1990 memorandum "Performance Test Calculation Guidelines", issued by William G. Laxton, Director of the Technical Support Division, OAQPS, and John S. Seitz, Director of the Stationary Source Compliance Division, OAQPS, when calculating and reporting emission rates and concentrations in determining compliance with the new source performance standards (NSPS) and national emission standards for hazardous pollutants (NESHAP), as well as state implementation plans (SIP's), all emission standards should be considered to have at least two significant figures (SF's), but no more than three. Therefore, since the 0.1 lb/MMBtu emission limit for particulate matter comes from the Florida state SIP, it should be considered to have two SF's. In this case, the emission limit effectively becomes 0.10 lb/MMBtu. In order to comply with the emission limit of 0.1 lb/MMBtu, the highest allowable measured emission rate (measured to four SF's) is 0.1049 lb/MMBtu. Please correct the statement of basis to reflect the above discussion.

d. Section IV, Acid Rain Part: Please note that the allowances allocated to the Crist Plant units 4,5,6,7, as indicated under Section IV, Condition A.2 of the proposed permit have been changed. This revision was published in the Federal Register on September 28, 1998 (Vol. 63 No. 187, pp 51706-51765). We recommend that the allowances that are indicated for these units be adjusted to reflect the revised allocation.

an approved averaging plan is not approved, the owner or operator of each unit in the plan shall operate the unit in compliance with the emission limitation that would apply in the absence of an averaging plan or revision to a plan. Therefore, in the case where the permittee has an approved averaging plan but wishes to revise the plan, the approval of the revision is not final until all permitting authorities have approved the revision. Should the revision not be approved then the permittee is required to comply with the original approved (assuming it has been approved for multiple years) plan in absence of the revision.

Region 4's concern regarding the Rule 62-214.330(3)(b) requiring the designated representatives of a source in a multi-agency Phase II Averaging Plan to certify that every other affected permitting authority has approved the plan prior to the State of Florida's approval was indicated in a letter sent to Mr. Howard Rhodes from Mr. Douglas Neeley on December 9, 1997. It was Region 4's understanding, at that time, that Florida's Rule 62-214.330 was scheduled to be revised to avoid conflicts (such as has been described above) with the Federal Rule 40 CFR Part 76. Appendix CP-1 was prepared so that the approval process would not be delayed in the interim. Please provide Region 4 with a schedule indicating when the revision is to occur.

2) General Comments

a. Section II, condition 1: Please make sure that Appendix TV-2 reflects the updated version of condition 51, as it is contained in Appendix TV-3.

b. Section II, condition 12: Please correct the address, telephone and fax number for the Air Enforcement Section. All required reports should be sent to the Air Enforcement Section (AES), not the Operating Source Section. The correct telephone and fax numbers for AES are 404/562-9055 and 404/562-9163, respectively. Additionally, please delete the information concerning the submission of Acid Rain information. Region 4 does not have an Acid Rain Section.

c. Statement of Basis: The statement of basis indicates that each emission unit is subject to a particulate matter emissions limit of 0.1 lb/MMBtu, and this limit is effectively equivalent to 0.149 lb/MMBtu due to rounding. This is also stated for conditions of soot blowing, where the particulate

INTEROFFICE MEMORANDUM

Date: 04-Mar-1999 04:37pm
From: Andy Allen PEN
ALLEN_A@A1@PNS1
Dept: Northwest District Office
Tel No: 850/595-8300

To: See Below
Subject: Re: GAM-60 Status Update

<> Not to rush your evaluation regarding our Gam-60 request, but I am getting
<> weekly requests for a status update on its use from Plant Crist. Did you
<> receive the test data submitted several weeks ago regarding its use at Plant
<> Crist. Please let me know if you have additional questions. Thanks.
<> Dwain

Dwain,

We do not have enough specific information upon which to base a well-informed decision.
From the information provided, you want us to modify your permits to allow introducing a total of 412.4 TPY GAM-60 into Unit 4, 5, 6, and 7 at an average rate of 94 lbs/hr. You have reported that the material "should be" taken out by the electrostatic participator. We need reasonable assurance that the additive does not result in an increase in particulate. The opacity meter results does not appear adequate to provide this assurance since a recent failed particulate test did not show up on the opacity meter. Please consider conducting a particulate test while introducing the 350 pounds per hour to provide us with the reasonable assurance that we need.

each ?

total 4-7 in common stack ?

Please let me know how permitting this activity was handled in some of the other Southern Company facilities.

Thanks,
Andy

Distribution:

To:	Waters, Glenn D.	(GDWATERS@southernco.com@PMDF@EPIC66)
To:	Andy Allen (E-mail)	(allen_a@A1@PNS1)
CC:	Ed Middleswart PEN	(MIDDLESWAR_E@A1@PNS1)
CC:	Carolyn Salmon PEN	(SALMON_C@A1@PNS1)
CC:	Bruce Mitchell TAL	(MITCHELL_B@A1@DER)
CC:	Jonathan Holtom TAL	(HOLTOM_J@A1@DER)

MEMORANDUM

April 9, 1999

To: All DEP Employees

From: David B. Struhs, Secretary

Subject: Sovereign Submerged Lands

Of all the responsibilities managed by DEP, perhaps among the most complex and sensitive issues are those involving sovereign submerged lands. These submerged lands are held in trust for all Floridians by the Trustees of the Internal Improvement Trust Fund (the Governor and Cabinet). This ownership arrangement, known as the Public Trust Doctrine, guarantees that these sovereign resources will be protected for all to enjoy.

The Trustees may authorize certain private uses of sovereign submerged lands when such use is not contrary to the public interest. The Trustees have over the years delegated to DEP the authority, as staff to the Board of Trustees, to take final action on certain applications for the use of sovereign submerged lands, as set forth in the Board-approved Delegations of Authority. These delegated authorities are based on criteria such as size of the pre-empted area, nature of the proposed use, etc. However, all such delegations are qualified by the following caveat , to wit:

> "When a matter which is the subject of a delegation involves a controversial matter or an issue of significant public interest, the matter shall be brought before the Governor and Cabinet for their decision."

This is frequently referred to as the "heightened public concern" provision.

I will be recommending to the Trustees that we initiate rulemaking to, among other things, spell out in more detail what factors should be considered and criteria applied in determining which projects are of "heightened public concern." In the meantime, in an effort to clarify when it is appropriate to bring a matter which involves delegated authorization to use sovereign submerged lands to the Trustees, staff should pay particular attention to whether the request is by its nature a controversial matter or an issue of significant public interest. More specifically, you should refer to Rule 18-21.0051(4), F.A.C., which involves consideration of whether the request for authorization "is reasonably expected to result in a heightened public concern, because

of its potential effect on the environment, natural resources, or controversial nature or location."

It is also recognized that from time to time members of the staff may in good faith have a significant professional disagreement involving a sovereign submerged lands or other issue. In this situation, it is important that the applicable decisionmaker (typically, the Department District Director, but, in some cases, others, such as the Department Secretary or where applicable, the Board of Trustees) be made aware of the disagreement by appropriate management personnel. In this atmosphere of transparency, the disagreement can be resolved in a professional manner and ultimately one that results in the best decision being reached on behalf of the people of the state of Florida.

This policy is in keeping with my philosophy that the best decisions come only after a free and open exchange of ideas where all views can be expressed and considered in arriving at the ultimate decision. Such an exchange of ideas and viewpoints is a healthy and worthwhile exercise. As DEP staff, you are all expected to express your opinions in an open, honest, and respectful manner. Nowhere is this more true than when we are seeking the best management decisions for Florida's submerged lands resources. I look forward to working with you on these issues.

cc: Steve Medina, General Counsel, PEER
Pat Rose, Save the Manatee Club
Colleen Castille, Chief Cabinet Aide, Office of the Governor
Jena Brooks, Cabinet Aide, Commissioner of Education
Diana Sawaya-Crane, Cabinet Aide, Attorney General
Dana Wiehle, Cabinet Aide, State Comptroller
Michele Myers, Cabinet Aide, Commissioner of Agriculture
Wayne Hrydziusko, Cabinet Aide, State Treasurer
Kim Grippa, Cabinet Aide, Secretary of State
Henry Dean, Executive Director, SJRWMD
Sonny Vergara, Executive Director, SWFWMD
Jim Harvey, Interim Executive Director, SFWMD
Jerry Scarborough, Executive Director, SRWMD
Kirby B. Green, III, Deputy Secretary, DEP
Judy Brooks, Director of Cabinet Affairs, DEP
F. Perry Odom, General Counsel, DEP

DEP

Fax

To:	Dwain Waters	**From:**	Jonathan Holtom
Fax:	850/444-6217	**Pages:**	7 (including cover)
Phone:	850/444-6527	**Date:**	04/07/99
Re:	Model Results	**CC:**	

☐ **Urgent** ☐ **For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

- **Comments:** I am still trying to locate a map that I can fax to you. I will E-mail a clean copy of the Proposed permit for Crist and a Revised Draft permit for Scholz as soon as I get them finished. Probably tomorrow. Tuesday, 4/13 @ 1:30 looks OK, Clair would like a brief agenda faxed or E-mailed if possible. Call me if you have any questions.

INTEROFFICE MEMORANDUM

Date: 12-Mar-1999 08:15am
From: Waters, Glenn D.
Dept:
Tel No:

To: Jonathan Holtom

Subject: Gulf NOx Averaging Plan

The following is a response to your NOx Averaging question. The word is that the states of Alabama and Mississippi have approved the System NOx Averaging Plan. However, Georgia Power has requested that 3 small units be added to the plan. These units were suppose to have been converted to gas as part of the ozone SIP for Atlanta but I gather there has been a delay in the pipeline for gas. Georgia Power will offset the new emissions within GPC and there will be no changes to any of the existing units in the plan. This however will require new applications to all parties and a new round of state approval. SO, you better keep your default language as you have it. Let me know if you have any questions.
Dwain

INTEROFFICE MEMORANDUM

Date: 05-Mar-1999 08:51am
From: Waters, Glenn D.
GDWATERS@southernco.com@PMDF@EPIC66
Dept:
Tel No:

To: Jonathan Holtom (E-mail) (holtom_j@A1@DER)
CC: Scott M. Sheplak (E-mail) (sheplak_s@A1@DER)
CC: Clair H. Fancy (E-mail) (fancy_c@A1@DER)
CC: Angela Morrison (E-mail) (morrisona@hgss.com@PMDF@EPIC66)

Subject: 2nd Request: Title V Comments

2nd Request: Original request 2/12/99.
Dwain

-----Original Message-----
From: Waters, Glenn D.
Sent: Friday, February 12, 1999 1:46 PM
To: Jonathan Holtom (E-mail)
Cc: Angela Morrison (E-mail); Clair H. Fancy (E-mail); Scott M. Sheplak (E-mail)
Subject: Title V Comments

Gulf Power would like to continue a timely productive process on our Title V permits. Our attorneys have indicated that there is no requirement for the RO to sign comments in reference to your request for Gulf Power to resubmit our Title V December 98 comments for Plant Crist. As you may recall, the original draft of the Gulf Power permits for Crist, Smith and Scholz were sent out in September, 1997. During the early comment periods, Gulf Power requested and FDEP agreed to work together with us to resolve any modeling issues. The reason for this request was to eliminate fuel contract concerns so fuel negotiations could remain flexible. Additionally, Plant Smith requested and has implemented the suggested fencing to assure compliance with your model results even though we haven't had an opportunity to review those results. To date, no data or proposed limits have been received regarding this matter for Plant Smith and Plant Scholz. Please provide Gulf Power with a timely schedule when we can expect information regarding a final permit or a response to our comments for Plant Crist and information to resolve Smith and Scholz modeling issues.

If you have any questions or would like to further discuss these issues, please call me at (850) 444 - 6527. Thanks.
Dwain

When will a response be ready? Scott 3/5

INTEROFFICE MEMORANDUM

Date: 29-Jan-1999 04:13pm
From: Waters, Glenn D.
GDWATERS@southernco.com@PMDF@EPIC66
Dept:
Tel No:

To: 'Jonathan Holtom TAL 850/921-9531 G (HOLTOM_J@A1@DER)
To: Andy Allen PEN (ALLEN_A@A1@PNS1)
To: Waters, Glenn D. (GDWATERS@southernco.com@PMDF@EPIC66)

Subject: Re: Crist GAM-60

Per our conversation yesterday, Plant Crist conducted a test this morning whereby GAM-60 was injected at the normal rate (300 lbs) and opacity readings were taken. Below is a summary sheet of the data but the test showed no impact on emissions. The opacity did not change from 3.9-4.0 before, during or after the test.

If you have any further questions regarding this issue, please email me. Thanks.

Background - Unit 5 loaded to 82 MW at 7-8 am- 1/29/99
300 lbs of GAM-60 injected into the boiler at 8:35-9:05.

Opacity readings 1/29/99:
7am-8am
4.3,4.3,4.2,4.3,4.1,4.2,4.2,5.2,4.1,4.1

8am -9am
4.4,4,4,4.2,1.0,3.9,3.9,3.9,4.0,3.9,3.9

9am-10am
3.9,3.9,3.9,3.9,3.9,3.9,3.9,3.9,3.9,3.9

D4.2wain

-----Original Message-----
From: Jonathan Holtom TAL 850/921-9531 GIC: 286
[SMTP:HOLTOM_J@dep.state.fl.us]
Sent: Thursday, January 28, 1999 9:19 AM
To: Andy Allen PEN; Waters, Glenn D.
Subject: Re: Crist GAM-60

Andy/Dwain,

How about performing some tests while injecting the GAM-60 to see what happens.

This could serve to provide the Department with a basis for approving or disapproving the use of the GAM-60 while allowing Gulf Power the opportunity to make definitive claims on emissions rather than speculation. If testing is not an acceptable option, maybe Gulf Power could suggest some other type of information to satisfy the Department's concerns.

At this point, I am hesitant to continue with blanket approval in the Title V permit until the compliance office is satisfied that there will not be a significant increase in pollutant emissions. Please let me know what will be agreeable to both of you as soon as you can.

<>
<> I thought this would be the fastest way to respond to your questions
<> regarding GAM-60 use at Plant Crist. If you need a formal letter, I can
<> send this as a official response letter.
<>
<> The form of borate is listed in the MSDS as Sodium Tetraborate Pentahydrate
<> and Disodium Octaborate Tetrahydrate. Any GAM-60 not used in the boiler
<> should be collected by the electrostatic precipitator as normal particulate
<> matter and disposed as ash. It is my understanding that the material
<> attaches to the boiler tubes and helps maintain the reheat temperature.
<> These borate materials are not listed as a hazardous waste under RCRA or
<> CERCLA/SARA nor listed under the Safe Drinking Water Act or Clean Water Act.
<>
<>
<> You should have received with the initial request letter, a copy of the MSDS
<> sheet for GAM-60. If you did not receive the MSDS, I can fax one to you.
<> Also, this material has been previously discussed and evaluated with
<> Jonathan Holtom for Title V purposes and at last conversation is being
<> included as a additive for all the Gulf Power units.
<>
<> If you have any further questions, please call me at (850) 444-6527.
<> Thanks.

<>
<>
<>
<> Dwain
Dwain,

I think what is bothering me is your statement; "SHOULD BE COLLECTED BY THE ESP".
If it attaches to the tubes, why do you have to keep adding so much?

How do we know that you are not increasing particulate emmissions to the atmosphere?

Thanks,
Andy

RFC-822-headers:
Received: from alxapex03.southernco.com (socp-b.scsnet.com)
 by EPIC66.DEP.STATE.FL.US (PMDF V5.1-4 #7204)
 with ESMTP id <01J74A4YNZUO000775@EPIC66.DEP.STATE.FL.US> for
 HOLTOM_J@dep.state.fl.us; Fri, 29 Jan 1999 15:57:42 EST
Received: by ALXAPEX03.southernco.com with Internet Mail Service (5.5.2232.9)
 id <DZ2YZ6BR>; Fri, 29 Jan 1999 14:56:11 -0600
X-Mailer: Internet Mail Service (5.5.2232.9)

INTEROFFICE MEMORANDUM

Date: 29-Jan-1999 04:16pm
From: Waters, Glenn D.
GDWATERS@southernco.com@PMDF@EPIC66
Dept:
Tel No:

To: Waters, Glenn D. (GDWATERS@southernco.com@PMDF@EPIC66)
To: 'Jonathan Holtom TAL 850/921-9531 G (HOLTOM_J@A1@DER)
To: 'Andy Allen PEN' (ALLEN_A@A1@PNS1)

Subject: Re: Crist GAM-60

Sorry, I had a typo on the last version. Opacity change from 1.0 to 4.0 at 8-9am and the loading of the unit was until 8:30am.
Dwain

-----Original Message-----
From: Waters, Glenn D.
Sent: Friday, January 29, 1999 2:56 PM
To: 'Jonathan Holtom TAL 850/921-9531 GIC: 286'; Andy Allen PEN; Waters, Glenn D.
Subject: RE: Crist GAM-60

Per our conversation yesterday, Plant Crist conducted a test this morning whereby GAM-60 was injected at the normal rate (300 lbs) and opacity readings were taken. Below is a summary sheet of the data but the test showed no impact on emissions. The opacity did not change from 3.9-4.0 before, during or after the test.

If you have any further questions regarding this issue, please email me. Thanks.

Background - Unit 5 loaded to 82 MW at 7-8:30 am- 1/29/99
300 lbs of GAM-60 injected into the boiler at 8:35-9:05.

Opacity readings 1/29/99:
7am-8am
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8am -9am
4.4,4,4,4.2,4.0,3.9,3.9,3.9,4.0,3.9,3.9

9am-10am
3.9,3.9,3.9,3.9,3.9,3.9,3.9,3.9,3.9,3.9

D4.2wain

-----Original Message-----
From: Jonathan Holtom TAL 850/921-9531 GIC: 286 [SMTP:HOLTOM_J@dep.state.fl.us] <mailto:[SMTP:HOLTOM_J@dep.state.fl.us]>
Sent: Thursday, January 28, 1999 9:19 AM
To: Andy Allen PEN; Waters, Glenn D.
Subject: Re: Crist GAM-60

Andy/Dwain,

How about performing some tests while injecting the GAM-60 to see what happens. This could serve to provide the Department with a basis for approving or disapproving the use of the GAM-60 while allowing Gulf Power the opportunity to make definitive claims on emissions rather than speculation. If testing is not an acceptable option, maybe Gulf Power could suggest some other type of information to satisfy the Department's concerns.

At this point, I am hesitant to continue with blanket approval in the Title V permit until the compliance office is satisfied that there will not be a significant increase in pollutant emissions. Please let me know what will be agreeable to both of you as soon as you can.

<>
<> I thought this would be the fastest way to respond to your questions
<> regarding GAM-60 use at Plant Crist. If you need a formal letter, I can
<> send this as a official response letter.
<>
<> The form of borate is listed in the MSDS as Sodium Tetraborate Pentahydrate
<> and Disodium Octaborate Tetrahydrate. Any GAM-60 not used in the boiler
<> should be collected by the electrostatic precipitator as normal particulate
<> matter and disposed as ash. It is my understanding that the material
<> attaches to the boiler tubes and helps maintain the reheat temperature.
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<> CERCLA/SARA nor listed under the Safe Drinking Water Act

or Clean
Water Act.
<>
<>
<> You should have received with the initial request
letter, a copy
of the MSDS
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<> Also, this material has been previously discussed and
evaluated
with
<> Jonathan Holtom for Title V purposes and at last
conversation is
being
<> included as a additive for all the Gulf Power units.
<>
<> If you have any further questions, please call me at
(850)
444-6527.
<> Thanks.
<>
<>
<>
<> Dwain
Dwain,
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"SHOULD BE
COLLECTED BY THE ESP".
If it attaches to the tubes, why do you have to keep adding
so much?
How do we know that you are not increasing particulate
emmissions to
the atmosphere?

Thanks,
Andy

RFC-822-headers:
Received: from alxapex03.southernco.com (socp-b.scsnet.com)
 by EPIC66.DEP.STATE.FL.US (PMDF V5.1-4 #7204)
 with ESMTP id <01J74A9V4C9S0005GN@EPIC66.DEP.STATE.FL.US> for
 HOLTOM_J@dep.state.fl.us; Fri, 29 Jan 1999 16:01:40 EST
Received: by ALXAPEX03.southernco.com with Internet Mail Service (5.5.2232.9)
 id <DZ2YZ61Q>; Fri, 29 Jan 1999 15:00:08 -0600
X-Mailer: Internet Mail Service (5.5.2232.9)

INTEROFFICE MEMORANDUM

Date: 28-Jan-1999 09:58am
From: Andy Allen PEN
ALLEN_A@A1@PNS1
Dept: Northwest District Office
Tel No: 850/595-8300

To: Waters, Glenn D. (GDWATERS@southernco.com@PMDF@EPIC66)
CC: Jonathan Holtom TAL (HOLTOM_J@A1@DER)

Subject: Re: Crist GAM-60

<>
<> I thought this would be the fastest way to respond to your questions
<> regarding GAM-60 use at Plant Crist. If you need a formal letter, I can
<> send this as a official response letter.
<>
<> The form of borate is listed in the MSDS as Sodium Tetraborate Pentahydrate
<> and Disodium Octaborate Tetrahydrate. Any GAM-60 not used in the boiler
<> should be collected by the electrostatic precipitator as normal particulate
<> matter and disposed as ash. It is my understanding that the material
<> attaches to the boiler tubes and helps maintain the reheat temperature.
<> These borate materials are not listed as a hazardous waste under RCRA or
<> CERCLA/SARA nor listed under the Safe Drinking Water Act or Clean Water Act.
<>
<>
<> You should have received with the initial request letter, a copy of the MSDS
<> sheet for GAM-60. If you did not receive the MSDS, I can fax one to you.
<> Also, this material has been previously discussed and evaluated with
<> Jonathan Holtom for Title V purposes and at last conversation is being
<> included as a additive for all the Gulf Power units.
<>
<> If you have any further questions, please call me at (850) 444-6527.
<> Thanks.
<>
<>
<>
<> Dwain
Dwain,
I think what is bothering me is your statement; "SHOULD BE COLLECTED BY THE ESP".

If it attaches to the tubes, why do you have to keep adding so much? How do we know that you are not increasing particulate emmissions to the atmosphere?

Thanks,
Andy

INTEROFFICE MEMORANDUM

Date: 28-Jan-1999 03:07pm
From: Waters, Glenn D.
GDWATERS@southernco.com@PMDF@EPIC66
Dept:
Tel No:

To: 'Jonathan Holtom TAL 850/921-9531 G (HOLTOM_J@A1@DER)
To: Andy Allen PEN (ALLEN_A@A1@PNS1)
To: Waters, Glenn D. (GDWATERS@southernco.com@PMDF@EPIC66)

Subject: Re: Crist GAM-60

Crist has agreed to monitor opacity the next time they inject GAM-60. We should have data next week.
Dwain

-----Original Message-----
From: Jonathan Holtom TAL 850/921-9531 GIC: 286 [SMTP:HOLTOM_J@dep.state.fl.us]
Sent: Thursday, January 28, 1999 9:19 AM
To: Andy Allen PEN; Waters, Glenn D.
Subject: Re: Crist GAM-60

Andy/Dwain,

How about performing some tests while injecting the GAM-60 to see what happens.
This could serve to provide the Department with a basis for approving or
disapproving the use of the GAM-60 while allowing Gulf Power the opportunity to
make definitive claims on emissions rather than speculation. If testing is not
an acceptable option, maybe Gulf Power could suggest some other type of
information to satisfy the Department's concerns.

At this point, I am hesitant to continue with blanket approval in the Title V
permit until the compliance office is satisfied that there will not be a
significant increase in pollutant emissions. Please let me know what will be
agreeable to both of you as soon as you can.

<>
<> I thought this would be the fastest way to respond to your questions
<> regarding GAM-60 use at Plant Crist. If you need a formal letter, I can
<> send this as a official response letter.
<>

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to you.
<> Also, this material has been previously discussed and evaluated with
<> Jonathan Holtom for Title V purposes and at last conversation is being
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<>
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<> Thanks.
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<> Dwain
Dwain,
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If it attaches to the tubes, why do you have to keep adding so much?

How do we know that you are not increasing particulate emmissions to the atmosphere?

Thanks,
Andy

RFC-822-headers:
Received: from alxapex03.southernco.com (socp-b.scsnet.com)
by EPIC66.DEP.STATE.FL.US (PMDF V5.1-4 #7204)
with ESMTP id <01J72TWN01LC002MCK@EPIC66.DEP.STATE.FL.US> for
HOLTOM_J@dep.state.fl.us; Thu, 28 Jan 1999 15:02:49 EDT
Received: by ALXAPEX03.southernco.com with Internet Mail Service (5.5.2232.9)
id <DZ2YZMTG>; Thu, 28 Jan 1999 13:40:42 -0600
X-Mailer: Internet Mail Service (5.5.2232.9)

Below is the Plant Crist response regarding the additive GAM-60 which the plant would like to use to maintain or increase reheat temperature. Current plans are to use the product in Units 4 & 5. They may want to try it later in Unit 6 & 7 so I would suggest to go ahead and modify our permit for all units at Plant Crist. The feed rate is 300 to 350 pounds per every 48 hours per unit but as outlined below it would be injected within one hour. The about per year based on a 48 hour usage would be 127,750 pounds/year. Of course this is based on continuous usage which would not be the case due to load cuts and outages, but for maximum use it should be correct. The calculated maximum rates for the units therefore are:

Unit 4 - 7.29 lbs/hr average rate or 31.9 tons/year
Unit 5 - 7.29 lbs/hr average rate or 31.9 tons/year
Unit 6 - 29.6 lbs/hr average rate or 129.6 tons/year (estimated amount based on MW size)
Unit 7 - 50.1 lbs/hr average rate or 219 tons/year (estimated amount based on MW size)

The MSDS sheet is attached. The sulfur % is .45% by weight. Therefore there should be no problem with SO2. Additionally, fugitive emissions should also not be a problem due to the method outlined below for injection.

Please look at modifying the current draft to include this additive with others outlined under Methods of Operation. Please call me if you have additional questions on this product. Thanks.

Dwain

-----Original Message-----
From: Young, Melvin A., III
Sent: Tuesday, December 01, 1998 12:50 PM
To: Waters, Glenn D.
Cc: Dominey, John M.
Subject:

Dwain,

The Gam-60 product is put into the furnace through an observation port above the burners. It is sucked out of the barrel by an compressed air eductor at a rate of one barrel (300 pounds) per hour. One barrel is put in every three to four days as needed.

The attached file is the MSDS you requested. If you have any other questions feel free to contact me, ext. 2214.

Mel <<GAM60.DOC>>

MATERIAL SAFETY DATA SHEET

1 CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name:	GAM-60	Manufacturer:	Benetech, Inc.
Grades:	Technical		1750 Eastwood Drive
Chemical Formula:	Mixture (refer to Section 2)		Aurora, IL 60506
Chemical Name/Synonyms:	Mixture (refer to Section2)		
Chemical Family:	Inorganic Borates	Emergency Phone Numbers:	
		24 Hr. Info. Service:	(800) 843-2625
		CHEMTREC:	(800) 424-9300

2 COMPOSITION/INFORMATION OF INGREDIENTS' OSHA HAZARDS

A proprietary blend of borates (greater than 97%).

3 HAZARD IDENTIFICATION

EMERGENCY OVERVIEW:

GAM-60 is a white odorless, granular substance that is not flammable, combustible, or explosive, and it presents no unusual hazard if involved in a fire. GAM-60 presents little or no hazard (to humans) and has low acute oral and dermal toxicities. Care should be taken not to exceed recommended application rates for GAM-60 to avoid adverse ecological effects.

POTENTIAL ECOLOGICAL EFFECTS:

Routes of Exposure: Inhalation is the most significant route of exposure in occupational and other setting. Dermal exposure is not usually a concern because GAM-j60 is not absorbed through intact skin.

Inhalation: Occasional mild irritation effects to nose and throat may occur from inhalation of GAM-60 dusts at levels greater than 10 mg/m^3.

Eye Contact: GAM-60 may cause eye irritation. Avoid contact with eyes.

Skin Contact: GAM-60 does not cause irritation to intact skin.

Ingestion: Products containing GAM-60 are not intended for ingestion. GAM-60 has a relatively low acute toxicity. Small amounts (e.g. a teaspoonful) swallowed accidently is not likely to cause effects; swallowing amounts larger than that may cause gastrointestinal symptons.

Eye Contact: GAM-60 may cause eye irritation. Avoid contact with eyes.

Skin Contact: GAM-6- does not cause irritation to intact skin.

Ingestion: Products containing GAM-60 are not intended for ingestion. GAM-60 has a relatively low acute toxicity. Small amounts (e.g. a teaspoonful) swallowed accidentally is not likely to cause effects; swallowing amounts larger than that may cause gastrointestinal symptoms.

Cancer: GAM-60 is not considered a carcinogen.

Reproductive: Long-term, high dose animal ingestion studies have demonstrated reproductive effects in male animals. A human study of occupational exposure to borate dust showed no adverse affect to reproduction.

Developmental: High dose animal ingestion studies have demonstrated developmental effects in fetuses of pregnant animals, including fetal weight loss.

GAM-60 is non-hazardous waste when spilled or disposed of, as defined in the Resource Conservation and Recovery Act (RCRA) regulations (40 CFR 261). (Refer to Regulatory Information Section 15 for additional references and information regarding EPA and California regulations.)

7 HANDLING AND STORAGE

Storage Temperature: Ambient

Storage Pressure: Atmospheric

Special Sensitivity: Moisture (Caking)

General: Avoid contact with eyes and wash thoroughly after handling. Dry indoor storage is recommended. To maintain package integrity and to minimize caking of the product, bags should be handled on a "first-in first-out" basis. Good housekeeping procedures should be followed to minimize dust generation and accumulation.

8 EXPOSURE CONTROLS/PERSONAL PROTECTION

Engineering Controls: Use local exhaust ventilation to keep airborne concentrations of GAM-60 dust below permissible exposure levels.

Personal Protection: Where airborne concentrations are expected to exceed exposure limits, NIOSH/MSHA certified respirators must be used. Eye goggles and gloves are recommended, especially in excessively dusty environments.

Occupational Exposure Limits: GAM-60 is listed/regulated by OSHA, Cal OSHA and ACGIH as "Particulate Note Otherwise Classified" or "Nuisance Dust"."

OSHA; PEL* - 15 mg/m^3 total dust and 5 mg/m^3 respirable dust

ACGIH; TLV** - 5 mg/m^3

Cal OSHA; PEL* - 5 mg/m^3

*PEL = "Permissible Exposure Limit"

**TLV = "Threshold Limit Value"

9 PHYSICAL AND CHEMICAL PROPERTIES

Appearance:	White, odorless, granular solid
Specific Gravity:	1.75 (5 Mol is 1.81)
Vapor Pressure:	Negligible at 20^0C
Viscosity:	Not applicable
Boiling Point:	Not applicable
Flash Point:	None
pH:	9.15 (3.0% solution) at 20^0C

10 STABILITY AND REACTIVITY

General: GAM-60 is a stable product.

Incompatible Materials and Conditions to Avoid: Reaction with strong reducing agents such as metal hydrides or alkali metals with generate hydrogen gas which could create an explosive hazard.

Hazardous Decomposition: None

11 TOXICOLOGICAL INFORMATION

INGESTION (ACUTE ORAL TOXICITY): Low acute oral toxicity; LD_{50} of GAM-60 in rats is expected to be approximately 5000 mg/kg of body weight based on results from similar borate chemicals.

SKIN (ACUTE DERMAL TOXICITY): Low acute dermal toxicity; LD_{50} of GAM-60 in rabbits is greater than 2000 mg/kg body weight.

PRIMARY SKIN IRRITATION INDEX: Expected to be 0 (zero), No effect.

EYE: Draize test in rabbits produced eye corrosive irritation effects. Many years of occupational exposure history reflect no indication of human eye injury from exposure to GAM-60.

NOTE: GAM-60 is chemically and toxicologically similar to the common borate chemical, Boric Acid. The majority of the borate chronic toxicology studies were conducted on Boric Acid. The Boric Acid data discussed in this section can be converted to GAM-60 equivalent data by dividing by a factor of 0.8171.

INHALATION: Human epidemiological studies show no increase in pulmonary disease in occupational populations with chronic exposures to Boric Acid dust and Sodium Borate dust.

CARCINOGENICITY: A Technical Report issued by the National Toxicology Program showed "no evidence of CARCINOGENICITY" from a full 2-year bioassay on Boric Acid in mice at feed doses of 2500 and 5000 ppm in the diet. No mutagenic activity was observed for Boric Acid in a recent battery of four short-term mutagenicity assays.

REPRODUCTIVE/DEVELOPMENTAL TOXICITY: Animal studies indicate Boric Acid reduces or inhibits sperm production, causes testicular atrophy, and, when given to pregnant animals during gestation, may cause developmental changes. These feed studies were conducted under chronic exposure conditions leading to doses many times in excess of those that could occur through inhalation of dust in occupational settings.

REPRODUCTIVE TOXICITY (Fertility): Dietary Boric Acid levels of 6,700 ppm in chronic feeding studies in rats and dogs produced testicular atrophy, while dogs and rats receiving 2,000 ppm did not develop testicular changes {[1] Weir, Fisher, 1972}. In chronic feeding studies of mice on diets containing 5,000 ppm (550 mg/kg/d) Boric Acid, testicular atrophy was present, while mice fed 2,500 ppm (275 mg/kg/d) Boric Acid showed no significant increase in testicular atrophy {[2]NTP, 1987}. In another Boric Acid chronic study, in mice given 4,500 ppm (636 mg/kg/d), degeneration of seminiferous tubules was present together with a reduction of germ cells, white at 1,000 ppm (152 mg/kg/d) no effect was seen {[3]Fail et al.,1991}.

In a reproduction study on rats, 2,000 ppm of dietary Boric Acid had no adverse effect on lactation, litter size, weight and appearnce {[1] Weir, Fisher, 1972}. In a continuous breeding study in mice there was a reduction in fertility rates for males receiving 4,500 ppm (636 mg/kg/d) Boric Acid, but not for females receiving 4,500 ppm Boric Acid {[3]Fail et al.,1991}.

Developmental Toxicity: Boric Acid at dietary levels of 1000 ppm (78 mg/kg/d) administered to pregnant female rats throughout gestation caused a slight reduction in fetal weight, but was considered to be close to the NOAEL.

Doses of 2,000 ppm (163 mg/kg/d) and above caused fetal malformations and maternal toxicity. In mice the no effect level for fetal weight reduction and maternal toxicity was 1,000 ppm (248 mg/kg/d) Boric Acid. Fetal weight loss was noted at dietary Boric Acid levels of 2,000 ppm (152 mg/kg/d) and above. Malformations (agenesis or shortening of the thirteenth rib) were seen at 4,000 ppm (1003 mg/kg/d), {[4]Heidel et al., 1992}.

[1] {Weir, R.J. and Fisher, R.S. Toxicol. Appl. Pharmacol., 23:341-362 (1972)}

[2] {National Toxicology Program (NTP) - Technical Report Series No. TR324, NIH Publication No. 88-2480 (1987), PB88-21475/XAB)}

[3] {Fail et al., Fund. Appl. Toxicol, 17, 225-239 (1991)}

[4] {Heindel et al., Fund. Appl. Toxicol, 18, 226-277 (1992)}

12 ECOLOGICAL INFORMATION

ECOTOXICITY DATA:

Phytotoxicity: Although boron is an essential micronutrient for healthy growth of plants, it can be harmful to boron sensitive plant in higher quanitites. Plants and trees can easily be exposed by root absorption to toxic levels of boron in the form of water-soluble borate leached into nearby soil or waters. Care should be taken not to exceed recommendation application rates.

Fish Toxicity: Boron naturally occurs in seawater at an average concentration of 5 mg B/liter. In laboratory studies the acute toxicity (96-hr LC_{50}) for under-yearling Cobo salmon (Onchorhynchus kisutch) in seawater was determined as 40 mg B/L (added as sodium metaborate).

Boron concentrations in fresh surface water are generally less than 1 mg B/L. Laboratory studies on the toxicity of freshwater fish were determined using early life (embryolarval) stages in natural water and Boric Acid as a test substance. The results were:

Rainbow Trout (S. Gairdneri)
- 24 - day LC_{50} = 150.0 mg B/L
- 36 - day NOEC-LOEC = 0.75 mg B/L

Goldfish (Carassius Auratus)
- 7 - day NOEC-LOEC = 26.50 B/L
- 3 - day LC_{50} = 178 mg B/L

Invertebrate Toxicity: The acute toxicity (48-hour LC_{50}) to Daphnids (Daphnia magna Straus) in natural water is reported to be 133 mg B/L (added as Boric Acid). Estimated chronic toxicity (21-day NOEC-LOEC) values of 6 - 13 mg B/L (added as Boric Acid) have also been reported.

ENVIRONMENTAL FATE DATA:

Persistence/Degradation: Boron is naturally occurring and ubiquitous in the environment. GAM-60 decomposes in the environment to natural borate.

Soil Mobility: The product is soluble in water and is leachable through normal soil.

NOTE: Boron (B) is the element in GAM-60 which is used to characterize borate product ecological effects. To convert GAM-60 data to Boron (B), multiply by 0.143.

13 DISPOSAL CONSIDERATIONS

Disposal Guidance: Small quantities of GAM-60 can usually be disposed of at Municipal Landfill sites. No special disposal treatment is required, but refer to state and local regulations for applicable site-specific requirements. Tonnage quantities of product are not recommended to be sent to landfills. Such product should, if possible, be re-used for an appropriate application.

RCRA (40 CRF 261): GAM-60 is not listed under any sections of the Federal Resource Conservation and Recovery Act (RCRA).

California Hazardous Waste Designation: California identifies substances with acute LD_{50}'s less than 5,000 mg/kg as "hazardous wastes". GAM-60 may therefore be a "hazardous waste" if spilled in California, and should be handled in accordance with applicable state regulations.

Refer to Section 15 for additional regulatory information.

14 TRANSPORT INFORMATION

DOT Hazardous Material Classification: GAM-60 is not a U.S. Department of Transportation (DOT) Hazardous Material.

DOT Hazardous Substances Classification: GAM-60 is not a DOT Hazardous Substance.

International Transportation: GAM-60 has no U.N. Number, and is not regulated under international rail, highway, water or air transport regulations.

15 REGULATORY INFORMATION

TSCA No.: The major components of GAM-60 appear on the TSCA Inventory list under the CAS numbers representing the anhydrous forms of the inorganic borate salts Sodium Tetraborate (CAS No. 1330-43-4) and Disodium Octaborate (CAS No. 12006-41-2).

RCRA: GAM-60 is not listed as a hazardous waste under any sections of the Resource Conservation and Recovery Act of regulations (40 CFR 261 et seq.).

Superfund: CERCLA/SARA. GAM-60 is not listed under CERCLA (the Comprehensive Environmental Response Compensation and Liability Act) or its 1986 amendments, SARA, (the Superfund Amendments and Reauthorization Act), including substances listed under Section 313 of SARA, Toxic Chemicals, 42 USC 11023, 40 CFR 372.65; Section 302 of SARA, Extremely Hazardous Substances, 42 USC 11002, 40 CFR 355; or the CERCLA Hazardous Substances list, 42 USC 9604, 40 CFR 302.

Safe Drinking Water Act: GAM-60 is not regulated under the SDWA, 42 USC 300g-1, 40 CFR 141 et seq. Consult state and local regulations for possible water quality advisories regarding boron.

Clean Water Act (Federal Water Pollution Control Act):

33 USC 1251 et seq.

a. GAM-60 is not itself a discharge covered by any water quality criteria of Section 304 of the CWA, 33 USC 1314.

b. It is not on the Section 307 List of Priority Pollutants, 33 USC 1317, 40 CFR 116.

c. It is not on the Section 311 List of Hazardous Substances, 33 USC 1321, 40 CFR 116.

OSHA/Cal OSHA: This MSDS document meets the requirements of both OSHA (29 CFR 1910, 1200) and Cal OSHA (Title 8 ccr 5194(g)) hazard communication standards. Refer to Section 8 for regulatory exposure limits.

IARC: The International Agency for Research on Cancer (of the World Health Organization) does not list or categorize GAM-60 as a carcinogen.

NTP Annual Report on Carcinogens: GAM-60 is not listed.

OSHA Carcinogen: GAM-60 is not listed.

California Proposition 65: Gam-60 is not listed on any Proposition 65 lists of carcinogens or reproductive toxicants.

16 OTHER INFORMATION

Product Label Text Hazard Information

- May be harmful if swallowed.
- May cause eye irritation
- May cause reproductive harm or birth defects based on animal data.
- Avoid contamination of food or feed.
- Not for food, drug or pesticide use.
- Refer to MSDS.
- KEEP OUT OF REACH OF CHILDREN

National Fire Protection Associate (NFPA) Classification:

Health	0
Flammability	0
Reactivity	0

Hazardous Materials Information Systems (HMIS):

Red: (Flammability)	0
Yellow: (Reactivity)	0
Blue: (Acute Health)	1*

* Chronic Effects

Yes it is, thank you.

Hi Jonathan, I am Jeff Brown's secretary.
On December 18th we received a request for time extension from
the Gulf Power Company, Draft permit #0330045-001-AV.
They are asking for extended time until 02-01-99.

Is it okay to grant this extension?

JARO

Department of
Environmental Protection

Jeb Bush
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

David B. Struhs
Secretary

January 22, 1999

G. Dwain Waters
Air Quality Programs Coordinator
Gulf Power Company
One Energy Place
Pensacola FL 32520

Dear Mr. Waters:

This is in response to your request received by the Department January 20, to use the additive GAM-60.

You document that 412 tons per year of the inorganic borates are introduced into the furnaces from barrels at a rate of 300 pounds per hour. Please clarify what form and quantity of emissions results from routinely adding the average rate of 94 pounds per hour of borates.

If you have any questions, please contact me at 595-8364.

Sincerely,

A. S. Allen

Andrew S. Allen
Air Permitting Supervisor

ASA:aac

cc: Jonathan Holtom, DEP Division of Air Resources Management, Tallahassee

Division of Air Resources Management Tallahassee

--ATTENTION MAIL ROOM--

PLEASE ROUTE THIS DOCUMENT TO:

Jonathon Holtom Daem

Name of Individual/Office

5505

Mail Station Number

Recd By E-Mail Friday, 12/18 AM

GULF POWER COMPANY TITLE V PERMIT COMMENTS
CRIST ELECTRIC GENERATING PLANT
Proposed Permit No.: 0330045-001-AV
December 15, 1998

SECTION III. Emissions Units and Conditions

1. Gulf Power December 15, 1998 Comment:

A.4, B.4, C.4. **Hours of Operation**. Requires Units 1-2-3 to maintain an operations log available for Department inspection that documents the total hours of annual operation, including a detailed account of hours operated on each of the allowable fuels. 62-213.440 and 62-210.200(PTE).

Not specified

Comment: Unit(s) should not be required to have a continuous log of operations. Requirement does not note if this is a daily, hourly, monthly or annual log. Compliance to applicable standards are through vendor fuel oil analysis or generally exempt from annual visible emissions and particulate testing by operating less than 400 hour per year on fuel oil. The current reporting under the AOR is all that should be required.

If Log not kept, how do you demonstrate < 400 hrs/yr of Fuel oil

Please add a Permit Note to restate the following **FDEP November 14, 1997 Response:**
Rule 62-213.440, F.A.C. requires Title V permits to include "...operational requirements and limitations that assure compliance with all applicable requirements,..." Without the log book documentation, an annual claim on the AOR is not easily supportable and would not meet the requirements of Rule 62-213.440, F.A.C. A specification to daily, hourly, monthly, etc. is not needed as a detailed account of all fuels used is not time specific.

Log book reqd, No change needed.
hrs of operation & amts of fuel are needed for AEFs.

2. Gulf Power December 15, 1998 Comment:

A.14, B.14, C.14 **Sulfur Dioxide.** Requires fuel analysis for each fuel delivery. Please change to each fuel shipment. Each delivery could require each truck to be sampled and analyzed. Fuel is usually sampled per shipment for payment purposes.
Also, correct A.20 for reference to each fuel delivery.

If < Sulfur limit, no Sample needed.
otherwise, each delivery or Gas-Fired

3. Gulf Power December 15, 1998 Comment:

A.15, B.17, C.17, C.32 **Determination of Process Variables** **(a) Required Equipment**. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance. It should be noted that heat input (MMBtu/hr) for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/MMBtu) can be determined by the F-factor method as outlined in A.19 during this test. SO2 process variables are determined by vendor fuel analysis. Please note item is listed under C.17 and C.32.

Please add the following paragraphs from the Crist Statement of Basis and the Ft. Worth Title V permit as a Permit Note under A.15, B.17, and C.17. ?

The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for the purposes of confirming the emissions testing is conducted within 90 to 100 percent of the emissions unit's rated capacity (or to limit future operation to 110 persent of the test load), to establish appropriate emissions limits and to aid in determining future rule applicability. A note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required to demonstrate at what percentage of the rated capacity that the emissions unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of process variables for emissions tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

Additionally Gulf Power requests the following language be added similar to Ft. Worth Final Permit No: 0990045-002-AV:

The permittee and the Department agree that the CEMS used for the federal Acid Rain Program conservatively overestimates the heat input for this unit. The monitoring data for heat input is therefore not appropriate for purposes of compliance, including annual compliance certification. ??

4. Gulf Power October 28, 1997 Comment:

A.15, B.17, C.17, C.32 **Determination of Process Variables** **(b) Accuracy of Equipment**. Requires equipment and instruments noted in (a) above to be operated , 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) Please note that this item is also listed under C.17 and C.32. Quote of Rule

Up Chge

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO2 compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing. Gulf Power requests the following be added as a permit note:

This requirement applies to equipment used during compliance testing. Equipment used for SO2 compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. P.N. Not appropriate

5. Gulf Power December 15, 1998 Comment:

A.30, B.31, C.33 Recordkeeping and Reporting Requirements. Requires owner or operator to maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. Rule 62-214.440 and 62-4.070(3) F.A.C.

Comments: Unit(s) should not be required to maintain continuous records of fuel consumption if the unit accepts a percent sulfur restriction for sulfur dioxide compliance for liquid fuels or burns gas. Liquid fuel is monitored by as-received vendor fuel analysis. See condition A.20. Only annual reporting under the Annual Operating Report should be required.

Please add the Permit Note requested under A.4, B.4, C.4 under A.30, B..31, C.33, i.e.

Rule 62-213.440, F.A.C. requires Title V permits to include "...operational requirements and limitations that assure compliance with all applicable requirements,..." Without the log book documentation, an annual claim on the AOR is not easily supportable and would not meet the requirements of Rule 62-213.440, F.A.C. A specification to daily, hourly, monthly, etc. is not needed as a detailed account of all fuels used is not time specific. The source should have sufficient information for completion of the AOR. maintenance

6. Gulf Power October 28, 1997 Comment:

A.34, B.36, C.38 Used Oil. F. Record Keeping Requirements: The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (1): Condition requires the source to maintain records of quantities of used oil generated that is transferred into the approved AST (above ground storage tank) at the source.

Comments: Current procedures allow the AST to be batch-tested once it is filled and that quantity burned. It is overly burdensome to maintain records of each volume of oil added to the AST during any period. Additionally, there is no regulatory requirement for records to be completed by any specified date, particularly arbitrarily derived dates. **Please correct the November -1998 Draft Title V Crist Permit to previously agreed language outlined below:**

> **f. Record Keeping Requirements**. The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (2): Requires records of used oil management to completed by no later than the fifteenth day of the succeeding month.
>
> Gulf Power October 28, 1997 Comment: There is no regulatory requirement for any specified date for record keeping completion purposes. The Department's language in this part of the proposed condition regarding consecutive 12 month periods is not consistent with earlier provisions which talk about a calendar year limitation on the total quantity of used oil that can be burned. Delete this requirement.
>
> **FDEP November 14, 1997 Response:**
>
> Your interpretation of batch testing is correct, as long as you are not blending in order to meet the limits. The requirement to complete records within 15 days of the end of a given month will be deleted. Keep in

 still ok

mind, however, that it is your responsibility to be able to produce these records upon Department request. The requirement to maintain records of used oil usage during the previous 12 month period will be deleted. Used oil records should be maintained on a calendar year basis. ✓

As a result of this comment, **Condition A.34.f.** is changed:

From:
f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
(1) The gallons of on-specification used oil generated and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
(2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
(3) Results of the analyses required above.
[40 CFR 279.61 and 40 CFR 761.20(e)]

To:
f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
(1) The gallons of on-specification used oil generated and burned each month.
(2) Results of the analyses required above.
(3) Other information, besides testing, used to make a claim that the used oil meets the requirements of on-specification used oil or that the used oil contains less than 50 ppm of PCBs.
[40 CFR 279.72(b), 40 CFR 279.74(b) and 40 CFR 761.20(e)]

Add this

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP November 14, 1997response.

7. Gulf Power October 28, 1997 Comment:

B.3, C.3 Methods of Operation

- Correct B.3 by deleting statement referencing Fuel Oil is only used for periods of startup and as needed for flame stabilization. Crist Unit 4 & 5 has full capacity capability with fuel oil. See B.1 Permitted Capacity.
- Replace "on-site" generated with "Gulf Power". ?
- Add new Section (B) Other: Also add: Use of GAM-60 additive as necessary for re-heat temperature control.

Not until NWD is satisfied

8. Gulf Power December 15, 1998 Comment:

B.16, C.16 Sulfur Dioxide. Correct monitoring to "compliance" for SO2 CEMS. Add permit note under B.22, B.23, C.23, C.24 to note use of CEMS for SO2 compliance. This will correct the general confusion in the permit regarding what is the compliance method for SO2 under B.22 and B.23 (also C.23 and C.23).

Annual RATA requirement

9. Gulf Power December 15, 1998 Comment:

Add new B.19 similar to C.19 for additive testing. Additionally, Gulf Power believes GAM-60 should be tested only once to satisfy that the additive has no impact on compliance to particulate and/or SO2. Once a successful test shows no impact, annual testing should be deleted from the permit.

No change Now

10. Gulf Power December 15, 1998 Comment:

B.24, C.25 Continuous Monitor Performance Specifications. Plant does not current meet all aspects of 40 CFR Part 60 NSPS regulation. Add "or meet 40 CRF Part 75". Part 75 is generally more restrictive than Part 60. FDEP has previously agreed to this change in Compliance Simplification Workshops.

Please add "or meet 40 CFR Part 75".

probably ok

11. Gulf Power December 15, 1998 Comment:

C.9. Sulfur Dioxide – Solid Fuel Delete reference to unit not exceeding 87,035 tons per year. This statement was included as informational data from the Unit 6 construction permit. New guidance under Permit Simplification grants removal of informational data as permit limitations. See latest FAW notice.

in AC. Can't delete in T-5

12. Gulf Power December 15, 1998 Comment:

C.36. Recordkeeping Requirements. Delete specific requirement to maintenance logs for CEMS. This item is already covered under QA/QC requirements under C.24 and C.25.

NO?

13. Gulf Power December 15, 1998 Comment:

Appendix I-1 List of Insignificant Emissions Units and/or Activities.
General Comment: Many of the list of trivial or insignificant activities noted under the facility section and the applicant's "Emissions Unit 10" outlined in the Crist Title V Application were not included in the final permit. Gulf Power assumes that these activities and units not listed in the permit were determined to be either exempt or unregulated as "Trivial" by the Department's guidance memorandum dated March 15, 1996 or agreed to by the Department as case by case trivial activities requiring no permitting action.

FDEP agreed with this statement in a November 14, 1997 response. Gulf Power requests the above statement be incorporated under Appendix I-1 as a Permit Note.

Not needed
may change shield in hearing officer's eyes.

14. Gulf Power December 15, 1998 Comment:

Appndix U1 List of Unregulated Emissions Units and/or Activities.
Correct Cooling Towers SCC Code = 3-90-900-04

Thankyou. Addition will be made.

15. Gulf Power December 15, 1998 Comment:

Appendix CP-1 Alternative Phase II NOx Compliance Plan.
1. Change status reporting from quarterly to biannual pursuant to new Permit Simplification rules. See FAW.

16. Gulf Power December 15, 1998 Comment:

Table 2-1 Summary of Compliance Requirements. Correct Units 004, 005, 006, 007 SO2 method of compliance to Fuel Sampling and Analysis/CEMs, Time of Frequency (24 hour sample), Minimum Compliance Test Duration (24 hour or NA). See Ft. Worth example. Also delete NOx pollutant under 007 and reference to C.12 Permit Condition.

Recd By E-Mail Friday, 12/18 AM

GULF POWER COMPANY TITLE V PERMIT COMMENTS
CRIST ELECTRIC GENERATING PLANT
Proposed Permit No.: 0330045-001-AV
December 15, 1998

SECTION III. Emissions Units and Conditions

1. Gulf Power December 15, 1998 Comment:

A.4, B.4, C.4. **Hours of Operation**. Requires Units 1-2-3 to maintain an operations log available for Department inspection that documents the total hours of annual operation, including a detailed account of hours operated on each of the allowable fuels. 62-213.440 and 62-210.200(PTE).

Comment: Unit(s) should not be required to have a continuous log of operations. Requirement does not note if this is a daily, hourly, monthly or annual log. Compliance to applicable standards are through vendor fuel oil analysis or generally exempt from annual visible emissions and particulate testing by operating less than 400 hour per year on fuel oil. The current reporting under the AOR is all that should be required.

Please add a Permit Note to restate the following **FDEP November 14, 1997 Response:**
Rule 62-213.440, F.A.C. requires Title V permits to include "...operational requirements and limitations that assure compliance with all applicable requirements,..." Without the log book documentation, an annual claim on the AOR is not easily supportable and would not meet the requirements of Rule 62-213.440, F.A.C. A specification to daily, hourly, monthly, etc. is not needed as a detailed account of all fuels used is not time specific.

2. Gulf Power December 15, 1998 Comment:

A.14, B.14, C.14 **Sulfur Dioxide.** Requires fuel analysis for each fuel delivery. Please change to each fuel shipment. Each delivery could require each truck to be sampled and analyzed. Fuel is usually sampled per shipment for payment purposes.
Also, correct A.20 for reference to each fuel delivery.

3. Gulf Power December 15, 1998 Comment:

A.15, B.17, C.17, C.32 **Determination of Process Variables** (a) **Required Equipment**. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance. It should be noted that heat input (MMBtu/hr) for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/MMBtu) can be determined by the F-factor method as outlined in A.19 during this test. SO2 process variables are determined by vendor fuel analysis. Please note item is listed under C.17 and C.32.

Please add the following paragraphs from the Crist Statement of Basis and the Ft. Worth Title V permit as a Permit Note under A.15, B.17, and C.17.

The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for the purposes of confirming the emissions testing is conducted within 90 to 100 percent of the emissions unit's rated capacity (or to limit future operation to 110 persent of the test load), to establish appropriate emissions limits and to aid in determining future rule applicability. A note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required to demonstrate at what percentage of the rated capacity that the emissions unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of process variables for emissions tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

Additionally Gulf Power requests the following language be added similar to Ft. Worth Final Permit No: 0990045-002-AV:

The permittee and the Department agree that the CEMS used for the federal Acid Rain Program conservatively overestimates the heat input for this unit. The monitoring data for heat input is therefore not appropriate for purposes of compliance, including annual compliance certification.

4. Gulf Power October 28, 1997 Comment:

A.15, B.17, C.17, C.32 **Determination of Process Variables** **(b) Accuracy of Equipment**. Requires equipment and instruments noted in (a) above to be operated , 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) Please note that this item is also listed under C.17 and C.32.

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO2 compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing. Gulf Power requests the following be added as a permit note:

This requirement applies to equipment used during compliance testing. Equipment used for SO2 compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period.

5. Gulf Power December 15, 1998 Comment:

A.30, B.31, C.33 **Recordkeeping and Reporting Requirements.** Requires owner or operator to maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. Rule 62-214.440 and 62-4.070(3) F.A.C.

Comments: Unit(s) should not be required to maintain continuous records of fuel consumption if the unit accepts a percent sulfur restriction for sulfur dioxide compliance for liquid fuels or burns gas. Liquid fuel is monitored by as-received vendor fuel analysis. See condition A.20. Only annual reporting under the Annual Operating Report should be required.

Please add the Permit Note requested under A.4, B.4, C.4 under A.30, B..31, C.33, i.e.

Rule 62-213.440, F.A.C. requires Title V permits to include "...operational requirements and limitations that assure compliance with all applicable requirements,..." Without the log book documentation, an annual claim on the AOR is not easily supportable and would not meet the requirements of Rule 62-213.440, F.A.C. A specification to daily, hourly, monthly, etc. is not needed as a detailed account of all fuels used is not time specific. The source should have sufficient information for completion of the AOR.

6. Gulf Power October 28, 1997 Comment:

A.34, B.36, C.38 Used Oil. F. Record Keeping Requirements: The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (1): Condition requires the source to maintain records of quantities of used oil generated that is transferred into the approved AST (above ground storage tank) at the source.

Comments: Current procedures allow the AST to be batch-tested once it is filled and that quantity burned. It is overly burdensome to maintain records of each volume of oil added to the AST during any period. Additionally, there is no regulatory requirement for records to be completed by any specified date, particularly arbitrarily derived dates. **Please correct the November -1998 Draft Title V Crist Permit to previously agreed language outlined below:**

> **f. Record Keeping Requirements**. The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (2): Requires records of used oil management to completed by no later than the fifteenth day of the succeeding month.
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> Gulf Power October 28, 1997 Comment: There is no regulatory requirement for any specified date for record keeping completion purposes. The Department's language in this part of the proposed condition regarding consecutive 12 month periods is not consistent with earlier provisions which talk about a calendar year limitation on the total quantity of used oil that can be burned. Delete this requirement.
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> Your interpretation of batch testing is correct, as long as you are not blending in order to meet the limits. The requirement to complete records within 15 days of the end of a given month will be deleted. Keep in

mind, however, that it is your responsibility to be able to produce these records upon Department request. The requirement to maintain records of used oil usage during the previous 12 month period will be deleted. Used oil records should be maintained on a calendar year basis.

As a result of this comment, **Condition A.34.f.** is changed:

From:
f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
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(3) Results of the analyses required above.
[40 CFR 279.61 and 40 CFR 761.20(e)]
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(3) Other information, besides testing, used to make a claim that the used oil meets the requirements of on-specification used oil or that the used oil contains less than 50 ppm of PCBs.
[40 CFR 279.72(b), 40 CFR 279.74(b) and 40 CFR 761.20(e)]

Gulf Power December 15, 1997 Comment: Gulf Power accepts the FDEP November 14, 1997response.

7. Gulf Power October 28, 1997 Comment:

B.3, C.3 Methods of Operation

- Correct B.3 by deleting statement referencing Fuel Oil is only used for periods of startup and as needed for flame stabilization. Crist Unit 4 & 5 has full capacity capability with fuel oil. See B.1 Permitted Capacity.
- Replace "on-site" generated with "Gulf Power".
- Add new Section (B) Other: Also add: Use of GAM-60 additive as necessary for re-heat temperature control.

8. Gulf Power December 15, 1998 Comment:

B.16, C.16 Sulfur Dioxide. Correct monitoring to "compliance" for SO2 CEMS. Add permit note under B.22, B.23, C.23, C.24 to note use of CEMS for SO2 compliance. This will correct the general confusion in the permit regarding what is the compliance method for SO2 under B.22 and B.23 (also C.23 and C.23).

9. Gulf Power December 15, 1998 Comment:

Add new B.19 similar to C.19 for additive testing. Additionally, Gulf Power believes GAM-60 should be tested only once to satisfy that the additive has no impact on compliance to particulate and/or SO2. Once a successful test shows no impact, annual testing should be deleted from the permit.

10. Gulf Power December 15, 1998 Comment:

B.24, C.25 Continuous Monitor Performance Specifications. Plant does not current meet all aspects of 40 CFR Part 60 NSPS regulation. Add "or meet 40 CRF Part 75". Part 75 is generally more restrictive than Part 60. FDEP has previously agreed to this change in Compliance Simplification Workshops.

Please add "or meet 40 CFR Part 75".

11. Gulf Power December 15, 1998 Comment:

C.9. Sulfur Dioxide – Solid Fuel Delete reference to unit not exceeding 87,035 tons per year. This statement was included as informational data from the Unit 6 construction permit. New guidance under Permit Simplification grants removal of informational data as permit limitations. See latest FAW notice.

12. Gulf Power December 15, 1998 Comment:

C.36. Recordkeeping Requirements. Delete specific requirement to maintenance logs for CEMS. This item is already covered under QA/QC requirements under C.24 and C.25.

13. Gulf Power December 15, 1998 Comment:

Appendix I-1 List of Insignificant Emissions Units and/or Activities.
General Comment: Many of the list of trivial or insignificant activities noted under the facility section and the applicant's "Emissions Unit 10" outlined in the Crist Title V Application were not included in the final permit. Gulf Power assumes that these activities and units not listed in the permit were determined to be either exempt or unregulated as "Trivial" by the Department's guidance memorandum dated March 15, 1996 or agreed to by the Department as case by case trivial activities requiring no permitting action.

FDEP agreed with this statement in a November 14, 1997 response. Gulf Power requests the above statement be incorporated under Appendix I-1 as a Permit Note.

14. Gulf Power December 15, 1998 Comment:

Appndix U1 List of Unregulated Emissions Units and/or Activities.
Correct Cooling Towers SCC Code = 3-90-900-04

15. Gulf Power December 15, 1998 Comment:

Appendix CP-1 Alternative Phase II NOx Compliance Plan.
1. Change status reporting from quarterly to biannual pursuant to new Permit Simplification rules. See FAW.

16. Gulf Power December 15, 1998 Comment:

Table 2-1 Summary of Compliance Requirements. Correct Units 004, 005, 006, 007 SO2 method of compliance to Fuel Sampling and Analysis/CEMs, Time of Frequency (24 hour sample), Minimum Compliance Test Duration (24 hour or NA). See Ft. Worth example. Also delete NOx pollutant under 007 and reference to C.12 Permit Condition.

Recd By E-Mail Friday, 12/18 A.M.

GULF POWER COMPANY TITLE V PERMIT COMMENTS
CRIST ELECTRIC GENERATING PLANT
Proposed Permit No.: 0330045-001-AV
December 15, 1998

SECTION III. Emissions Units and Conditions

1. Gulf Power December 15, 1998 Comment:

A.4, B.4, C.4. **Hours of Operation**. Requires Units 1-2-3 to maintain an operations log available for Department inspection that documents the total hours of annual operation, including a detailed account of hours operated on each of the allowable fuels. 62-213.440 and 62-210.200(PTE).

Comment: Unit(s) should not be required to have a continuous log of operations. Requirement does not note if this is a daily, hourly, monthly or annual log. Compliance to applicable standards are through vendor fuel oil analysis or generally exempt from annual visible emissions and particulate testing by operating less than 400 hour per year on fuel oil. The current reporting under the AOR is all that should be required.

Please add a Permit Note to restate the following **FDEP November 14, 1997 Response:**
Rule 62-213.440, F.A.C. requires Title V permits to include "...operational requirements and limitations that assure compliance with all applicable requirements,..." Without the log book documentation, an annual claim on the AOR is not easily supportable and would not meet the requirements of Rule 62-213.440, F.A.C. A specification to daily, hourly, monthly, etc. is not needed as a detailed account of all fuels used is not time specific.

2. Gulf Power December 15, 1998 Comment:

A.14, B.14, C.14 **Sulfur Dioxide.** Requires fuel analysis for each fuel delivery. Please change to each fuel shipment. Each delivery could require each truck to be sampled and analyzed. Fuel is usually sampled per shipment for payment purposes.
Also, correct A.20 for reference to each fuel delivery.

3. Gulf Power December 15, 1998 Comment:

A.15, B.17, C.17, C.32 **Determination of Process Variables** **(a) Required Equipment**. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Below is the Plant Crist response regarding the additive GAM-60 which the plant would like to use to maintain or increase reheat temperature. Current plans are to use the product in Units 4 & 5. They may want to try it later in Unit 6 & 7 so I would suggest to go ahead and modify our permit for all units at Plant Crist. The feed rate is 300 to 350 pounds per every 48 hours per unit but as outlined below it would be injected within one hour. The about per year based on a 48 hour usage would be 127,750 pounds/year. Of course this is based on continuous usage which would not be the case due to load cuts and outages, but for maximum use it should be correct. The calculated maximum rates for the units therefore are:

Unit 4 - 7.29 lbs/hr average rate or 31.9 tons/year
Unit 5 - 7.29 lbs/hr average rate or 31.9 tons/year
Unit 6 - 29.6 lbs/hr average rate or 129.6 tons/year (estimated amount based on MW size)
Unit 7 - 50.1 lbs/hr average rate or 219 tons/year (estimated amount based on MW size)

The MSDS sheet is attached. The sulfur % is .45% by weight. Therefore there should be no problem with SO2. Additionally, fugitive emissions should also not be a problem due to the method outlined below for injection.

Please look at modifying the current draft to include this additive with others outlined under Methods of Operation. Please call me if you have additional questions on this product. Thanks.

Dwain

-----Original Message-----
From: Young, Melvin A., III
Sent: Tuesday, December 01, 1998 12:50 PM
To: Waters, Glenn D.
Cc: Dominey, John M.
Subject:

Dwain,

The Gam-60 product is put into the furnace through an observation port above the burners. It is sucked out of the barrel by an compressed air eductor at a rate of one barrel (300 pounds) per hour. One barrel is put in every three to four days as needed.

The attached file is the MSDS you requested. If you have any other questions feel free to contact me, ext. 2214.

Mel <<GAM60.DOC>>

MATERIAL SAFETY DATA SHEET

1 CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name:	GAM-60	Manufacturer:	Benetech, Inc.
Grades:	Technical		1750 Eastwood Drive
Chemical Formula:	Mixture (refer to Section 2)		Aurora, IL 60506
Chemical Name/Synonyms:	Mixture (refer to Section2)		
Chemical Family:	Inorganic Borates	Emergency Phone Numbers:	
		24 Hr. Info. Service:	(800) 843-2625
		CHEMTREC:	(800) 424-9300

2 COMPOSITION/INFORMATION OF INGREDIENTS' OSHA HAZARDS

A proprietary blend of borates (greater than 97%).

3 HAZARD IDENTIFICATION

EMERGENCY OVERVIEW:

GAM-60 is a white odorless, granular substance that is not flammable, combustible, or explosive, and it presents no unusual hazard if involved in a fire. GAM-60 presents little or no hazard (to humans) and has low acute oral and dermal toxicities. Care should be taken not to exceed recommended application rates for GAM-60 to avoid adverse ecological effects.

POTENTIAL ECOLOGICAL EFFECTS:

Routes of Exposure: Inhalation is the most significant route of exposure in occupational and other setting. Dermal exposure is not usually a concern because GAM-j60 is not absorbed through intact skin.

Inhalation: Occasional mild irritation effects to nose and throat may occur from inhalation of GAM-60 dusts at levels greater than 10 mg/m^3.

Eye Contact: GAM-60 may cause eye irritation. Avoid contact with eyes.

Skin Contact: GAM-60 does not cause irritation to intact skin.

Ingestion: Products containing GAM-60 are not intended for ingestion. GAM-60 has a relatively low acute toxicity. Small amounts (e.g. a teaspoonful) swallowed accidently is not likely to cause effects; swallowing amounts larger than that may cause gastrointestinal symptons.

Eye Contact: GAM-60 may cause eye irritation. Avoid contact with eyes.

Skin Contact: GAM-6- does not cause irritation to intact skin.

Ingestion: Products containing GAM-60 are not intended for ingestion. GAM-60 has a relatively low acute toxicity. Small amounts (e.g. a teaspoonful) swallowed accidentally is not likely to cause effects; swallowing amounts larger than that may cause gastrointestinal symptoms.

Cancer: GAM-60 is not considered a carcinogen.

Reproductive: Long-term, high dose animal ingestion studies have demonstrated reproductive effects in male animals. A human study of occupational exposure to borate dust showed no adverse affect to reproduction.

Developmental: High dose animal ingestion studies have demonstrated developmental effects in fetuses of pregnant animals, including fetal weight loss.

GAM-60 is non-hazardous waste when spilled or disposed of, as defined in the Resource Conservation and Recovery Act (RCRA) regulations (40 CFR 261). (Refer to Regulatory Information Section 15 for additional references and information regarding EPA and California regulations.)

7 HANDLING AND STORAGE

Storage Temperature: Ambient

Storage Pressure: Atmospheric

Special Sensitivity: Moisture (Caking)

General: Avoid contact with eyes and wash thoroughly after handling. Dry indoor storage is recommended. To maintain package integrity and to minimize caking of the product, bags should be handled on a "first-in first-out" basis. Good housekeeping procedures should be followed to minimize dust generation and accumulation.

8 EXPOSURE CONTROLS/PERSONAL PROTECTION

Engineering Controls: Use local exhaust ventilation to keep airborne concentrations of GAM-60 dust below permissible exposure levels.

Personal Protection: Where airborne concentrations are expected to exceed exposure limits, NIOSH/MSHA certified respirators must be used. Eye goggles and gloves are recommended, especially in excessively dusty environments.

Occupational Exposure Limits: GAM-60 is listed/regulated by OSHA, Cal OSHA and ACGIH as "Particulate Note Otherwise Classified" or "Nuisance Dust"."

OSHA; PEL* - 15 mg/m^3 total dust and 5 mg/m^3 respirable dust

ACGIH; TLV** - 5 mg/m^3

Cal OSHA; PEL* - 5 mg/m^3

*PEL = "Permissible Exposure Limit"

**TLV = "Threshold Limit Value"

9 PHYSICAL AND CHEMICAL PROPERTIES

Appearance:	White, odorless, granular solid
Specific Gravity:	1.75 (5 Mol is 1.81)
Vapor Pressure:	Negligible at 20^0C
Viscosity:	Not applicable
Boiling Point:	Not applicable
Flash Point:	None
pH:	9.15 (3.0% solution) at 20^0C

10 STABILITY AND REACTIVITY

General: GAM-60 is a stable product.

Incompatible Materials and Conditions to Avoid: Reaction with strong reducing agents such as metal hydrides or alkali metals with generate hydrogen gas which could create an explosive hazard.

Hazardous Decomposition: None

11 TOXICOLOGICAL INFORMATION

INGESTION (ACUTE ORAL TOXICITY): Low acute oral toxicity; LD_{50} of GAM-60 in rats is expected to be approximately 5000 mg/kg of body weight based on results from similar borate chemicals.

SKIN (ACUTE DERMAL TOXICITY): Low acute dermal toxicity; LD_{50} of GAM-60 in rabbits is greater than 2000 mg/kg body weight.

PRIMARY SKIN IRRITATION INDEX: Expected to be 0 (zero), No effect.

EYE: Draize test in rabbits produced eye corrosive irritation effects. Many years of occupational exposure history reflect no indication of human eye injury from exposure to GAM-60.

NOTE: GAM-60 is chemically and toxicologically similar to the common borate chemical, Boric Acid. The majority of the borate chronic toxicology studies were conducted on Boric Acid. The Boric Acid data discussed in this section can be converted to GAM-60 equivalent data by dividing by a factor of 0.8171.

INHALATION: Human epidemiological studies show no increase in pulmonary disease in occupational populations with chronic exposures to Boric Acid dust and Sodium Borate dust.

CARCINOGENICITY: A Technical Report issued by the National Toxicology Program showed "no evidence of CARCINOGENICITY" from a full 2-year bioassay on Boric Acid in mice at feed doses of 2500 and 5000 ppm in the diet. No mutagenic activity was observed for Boric Acid in a recent battery of four short-term mutagenicity assays.

REPRODUCTIVE/DEVELOPMENTAL TOXICITY: Animal studies indicate Boric Acid reduces or inhibits sperm production, causes testicular atrophy, and, when given to pregnant animals during gestation, may cause developmental changes. These feed studies were conducted under chronic exposure conditions leading to doses many times in excess of those that could occur through inhalation of dust in occupational settings.

REPRODUCTIVE TOXICITY (Fertility): Dietary Boric Acid levels of 6,700 ppm in chronic feeding studies in rats and dogs produced testicular atrophy, while dogs and rats receiving 2,000 ppm did not develop testicular changes {[1] Weir, Fisher, 1972}. In chronic feeding studies of mice on diets containing 5,000 ppm (550 mg/kg/d) Boric Acid, testicular atrophy was present, while mice fed 2,500 ppm (275 mg/kg/d) Boric Acid showed no significant increase in testicular atrophy {[2]NTP, 1987}. In another Boric Acid chronic study, in mice given 4,500 ppm (636 mg/kg/d), degeneration of seminiferous tubules was present together with a reduction of germ cells, white at 1,000 ppm (152 mg/kg/d) no effect was seen {[3]Fail et al.,1991}.

In a reproduction study on rats, 2,000 ppm of dietary Boric Acid had no adverse effect on lactation, litter size, weight and appearnce {[1] Weir, Fisher, 1972}. In a continuous breeding study in mice there was a reduction in fertility rates for males receiving 4,500 ppm (636 mg/kg/d) Boric Acid, but not for females receiving 4,500 ppm Boric Acid {[3]Fail et al.,1991}.

Developmental Toxicity: Boric Acid at dietary levels of 1000 ppm (78 mg/kg/d) administered to pregnant female rats throughout gestation caused a slight reduction in fetal weight, but was considered to be close to the NOAEL.

Doses of 2,000 ppm (163 mg/kg/d) and above caused fetal malformations and maternal toxicity. In mice the no effect level for fetal weight reduction and maternal toxicity was 1,000 ppm (248 mg/kg/d) Boric Acid. Fetal weight loss was noted at dietary Boric Acid levels of 2,000 ppm (152 mg/kg/d) and above. Malformations (agenesis or shortening of the thirteenth rib) were seen at 4,000 ppm (1003 mg/kg/d), {[4]Heidel et al., 1992}.

[1] {Weir, R.J. and Fisher, R.S. Toxicol. Appl. Pharmacol., 23:341-362 (1972)}

[2] {National Toxicology Program (NTP) - Technical Report Series No. TR324, NIH Publication No. 88-2480 (1987), PB88-21475/XAB)}

[3] {Fail et al., Fund. Appl. Toxicol, 17, 225-239 (1991)}

[4] {Heindel et al., Fund. Appl. Toxicol, 18, 226-277 (1992)}

12 ECOLOGICAL INFORMATION

ECOTOXICITY DATA:

Phytotoxicity: Although boron is an essential micronutrient for healthy growth of plants, it can be harmful to boron sensitive plant in higher quanitites. Plants and trees can easily be exposed by root absorption to toxic levels of boron in the form of water-soluble borate leached into nearby soil or waters. Care should be taken not to exceed recommendation application rates.

Fish Toxicity: Boron naturally occurs in seawater at an average concentration of 5 mg B/liter. In laboratory studies the acute toxicity (96-hr LC_{50}) for under-yearling Cobo salmon (Onchorhynchus kisutch) in seawater was determined as 40 mg B/L (added as sodium metaborate).

Boron concentrations in fresh surface water are generally less than 1 mg B/L. Laboratory studies on the toxicity of freshwater fish were determined using early life (embryolarval) stages in natural water and Boric Acid as a test substance. The results were:

Rainbow Trout (S. Gairdneri)
- 24 - day LC_{50} = 150.0 mg B/L
- 36 - day NOEC-LOEC = 0.75 mg B/L

Goldfish (Carassius Auratus)
- 7 - day NOEC-LOEC = 26.50 B/L
- 3 - day LC_{50} = 178 mg B/L

Invertebrate Toxicity: The acute toxicity (48-hour LC_{50}) to Daphnids (Daphnia magna Straus) in natural water is reported to be 133 mg B/L (added as Boric Acid). Estimated chronic toxicity (21-day NOEC-LOEC) values of 6 - 13 mg B/L (added as Boric Acid) have also been reported.

ENVIRONMENTAL FATE DATA:

Persistence/Degradation: Boron is naturally occurring and ubiquitous in the environment. GAM-60 decomposes in the environment to natural borate.

Soil Mobility: The product is soluble in water and is leachable through normal soil.

NOTE: Boron (B) is the element in GAM-60 which is used to characterize borate product ecological effects. To convert GAM-60 data to Boron (B), multiply by 0.143.

13 DISPOSAL CONSIDERATIONS

Disposal Guidance: Small quantities of GAM-60 can usually be disposed of at Municipal Landfill sites. No special disposal treatment is required, but refer to state and local regulations for applicable site-specific requirements. Tonnage quantities of product are not recommended to be sent to landfills. Such product should, if possible, be re-used for an appropriate application.

RCRA (40 CRF 261): GAM-60 is not listed under any sections of the Federal Resource Conservation and Recovery Act (RCRA).

California Hazardous Waste Designation: California identifies substances with acute LD_{50}'s less than 5,000 mg/kg as "hazardous wastes". GAM-60 may therefore be a "hazardous waste" if spilled in California, and should be handled in accordance with applicable state regulations.

Refer to Section 15 for additional regulatory information.

14 TRANSPORT INFORMATION

DOT Hazardous Material Classification: GAM-60 is not a U.S. Department of Transportation (DOT) Hazardous Material.

DOT Hazardous Substances Classification: GAM-60 is not a DOT Hazardous Substance.

International Transportation: GAM-60 has no U.N. Number, and is not regulated under international rail, highway, water or air transport regulations.

15 REGULATORY INFORMATION

TSCA No.: The major components of GAM-60 appear on the TSCA Inventory list under the CAS numbers representing the anhydrous forms of the inorganic borate salts Sodium Tetraborate (CAS No. 1330-43-4) and Disodium Octaborate (CAS No. 12006-41-2).

RCRA: GAM-60 is not listed as a hazardous waste under any sections of the Resource Conservation and Recovery Act of regulations (40 CFR 261 et seq.).

Superfund: CERCLA/SARA. GAM-60 is not listed under CERCLA (the Comprehensive Environmental Response Compensation and Liability Act) or its 1986 amendments, SARA, (the Superfund Amendments and Reauthorization Act), including substances listed under Section 313 of SARA, Toxic Chemicals, 42 USC 11023, 40 CFR 372.65; Section 302 of SARA, Extremely Hazardous Substances, 42 USC 11002, 40 CFR 355; or the CERCLA Hazardous Substances list, 42 USC 9604, 40 CFR 302.

Safe Drinking Water Act: GAM-60 is not regulated under the SDWA, 42 USC 300g-1, 40 CFR 141 et seq. Consult state and local regulations for possible water quality advisories regarding boron.

Clean Water Act (Federal Water Pollution Control Act):

33 USC 1251 et seq.

a. GAM-60 is not itself a discharge covered by any water quality criteria of Section 304 of the CWA, 33 USC 1314.

b. It is not on the Section 307 List of Priority Pollutants, 33 USC 1317, 40 CFR 116.

c. It is not on the Section 311 List of Hazardous Substances, 33 USC 1321, 40 CFR 116.

OSHA/Cal OSHA: This MSDS document meets the requirements of both OSHA (29 CFR 1910, 1200) and Cal OSHA (Title 8 ccr 5194(g)) hazard communication standards. Refer to Section 8 for regulatory exposure limits.

IARC: The International Agency for Research on Cancer (of the World Health Organization) does not list or categorize GAM-60 as a carcinogen.

NTP Annual Report on Carcinogens: GAM-60 is not listed.

OSHA Carcinogen: GAM-60 is not listed.

California Proposition 65: Gam-60 is not listed on any Proposition 65 lists of carcinogens or reproductive toxicants.

16 OTHER INFORMATION

Product Label Text Hazard Information

- May be harmful if swallowed.
- May cause eye irritation
- May cause reproductive harm or birth defects based on animal data.
- Avoid contamination of food or feed.
- Not for food, drug or pesticide use.
- Refer to MSDS.
- KEEP OUT OF REACH OF CHILDREN

National Fire Protection Associate (NFPA) Classification:

Health	0
Flammability	0
Reactivity	0

Hazardous Materials Information Systems (HMIS):

Red: (Flammability)	0
Yellow: (Reactivity)	0
Blue: (Acute Health)	1*

* Chronic Effects

Gulf Power, Lansing Smith Plant

Facility ID #: 0050014

Permit History

This facility consists of two coal fired boilers (Units 1 & 2) and one combustion turbine. Units 1 & 2 were originally permitted through an operation permit in 1973. The capacities that were listed in the application and incorporated into the permit were 130 MW & 1300 MMBtu/hr for Unit 1 and 140.75 MW & 1,406 MMBtu/hr for Unit 2. The electrostatic precipitators that were included with the original design were unable to meet the PM limit. Because of this, AC permits were issued in 1975 to install two additional EPs in order to meet the PM limit. The permits did not directly limit the capacities, but did incorporate the application data as enforceable conditions of the permit. The applications listed the capacities as 1,229 & 1,404 MMBtu/hr for Units 1 & 2, respectively. The electrical output was not mentioned in either the application or the permits.

Operation permits were issued following construction for Unit 1 in 1977 and for Unit 2 in 1978. The AO for Unit 1 limited heat input to 1,556 MMBtu/hr, the electrical output was not mentioned. The AO for Unit 2 limited heat input to 1,924 MMBtu/hr, the electrical output was not mentioned.

Renewal operating permits were issued in 1982 for Units 1 & 2, with the application for renewal listing the capacities as 1,556 and 1,974 MMBtu/hr, respectively. The electrical outputs were mentioned in the facility descriptions as 175 & 205 MW, respectively.

Renewal operating permits were issued in 1987 and 1992 for Units 1 & 2, with the application for renewal listing the capacities as 1,768 and 2,024 MMBtu/hr, respectively. The electrical outputs were mentioned in the permits as 175 & 205 MW, respectively. The permit states that the "Maximum allowable heat input is that heat input necessary to maintain electrical load output at 110% of the level at which the most recent successful particulate matter compliance test was conducted."

For compliance with the Title V requirements, the Title V DRAFT permit will be issued with the capacities listed at the levels allowed by the construction permits that were issued in 1975.

GULF POWER COMPANY

Plant	Unit No.	Primary Fuel	SO_2 (lb/MMBtu)	AC Permit No.	Issue Date	Exp. Date	Heat Input Limit	Requested Rates	Stack Height	Exit Dia.	Exit Temp.	Flow Rate (acfm)	FPS	Year Built
Smith	Boiler 1	Coal	6.17	AC03-2023	2/10/75		1,229	1,768	199 ft.	18 ft.	260 °F	984,400	64.5	5/12/65
				AO03-2031	8/17/77		1,556				1,556			
	Boiler 2	Coal	6.17	AC03-2024	2/10/75		1,404	2,042	"	"	"	"	"	4/9/67
				AO03-7636	**3/22/78**		1,924							
	CT	#2	0.5% S	N/A	N/A		542	542	33 ft.	13.7	1200 °F	1,069,740	120.9	5/18/71
				AO03-24090	11/16/79	11/1/84	542							
				AO03-2015	12/20/74	12/20/79	429.7							
Scholz	Boiler 1	Coal	6.17	AC32-2004	1/10/74		340.2	587	150 ft	13.5 ft.	330 °F	346,900	40.4	2/24/53
				AO32-4625	12/14/77	12/14/82	546							
	Boiler 2	Coal	6.17	AC32-2005	1/10/74		344.3	587	"	"	"	"	"	10/26/53
				AO32-4624	12/14/77	12/14/82	546							
Crist	Boiler 1	Nat. Gas	2.75	N/A	N/A		320	320	450 ft.	18 ft.	290 °F	802,500	52.6	1/1/45
				AO17-2073	1/8/75	1/8/80	249							
	Boiler 2	Nat. Gas	2.75	N/A	N/A		320	320	"	"	"	"	"	6/1/49
				AO17-2074	1/8/75	1/8/80	232							
	Boiler 3	Nat. Gas	2.75	N/A	N/A		550	550	"	"	"	"	"	9/1/52
				AO17-2075	1/8/75	1/8/80	310							
	Boiler 4	Coal	5.9	AC17-2126	10/15/75		491	977	"	"	"	"	"	7/1/59
				AO17-2185	8/30/77		1,025							
	Boiler 5	Coal	5.9	AC17-2127	10/15/75		422	977	"	"	"	"	"	6/1/61
				AO17-2186	9/15/77		926							
	Boiler 6	Coal	5.9	AC17-234016	10/7/93	***	3,368	3,368	450	23.2 ft.	320 °F	2,462,700	97.1	5/1/70
				AO17-4623	12/23/77		3,219							
	Boiler 7	Coal	5.9	N/A	N/A		5,824	5,824	"	"	"	"	"	8/1/73
				AO17-4622	12/23/77		4854 *							

645.7
645.7
420 N.G.
420 N.G.
550
1096.7
1096.7
3709.8?
6906.4

* Filed petition on 1/14/80, claiming that imposed heat limit was calc'ed by DEP inappropriatly.

** PM Limit for all = 0.1 lb/MMBtu.

*** AC17-234016 further limited PM and SO_2 to 1,475 and 87,035 tpy, respectively.

Jonathan Holtom

RECEIVED
NOV 20 1998
BUREAU OF
AIR REGULATION

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

Gulf Power Company
One Energy Place
Pensacola, FL 32520

OGC No. 97-1824

DRAFT Permit No.: 0330045-001-AV
Crist Plant
Escambia County

/

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 62-110.106(4), an extension of time, to and including December 18, 1998, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, Gulf states the following:

1. On or about November 9, 1998, Gulf received from the Department of Environmental Protection (Department) a Revised "Intent to Issue Title V Air Operation Permit" (Permit No. 0330045-001-AV) for the Crist Plant located in Escambia County, Florida. Along with the Intent to Issue, Gulf received a revised draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit." Gulf had previously received the original Intent to Issue and draft Title V permit on October 6, 1997, and a first revised draft Title V permit on October 12, 1998.

2. By orders dated October 13 and November 9, 1998, the Department granted extensions of time until December 1, 1998, within which to file a petition for an administrative hearing regarding the original and first revised Intents to Issue and draft Title V permits.

3. The current (second) revised draft permit and associated documents contain several provisions that warrant clarification or correction.

4. Representatives of Gulf have corresponded and intend to continue to correspond with staff of the Department's Bureau of Air Regulation in an effort to resolve all issues.

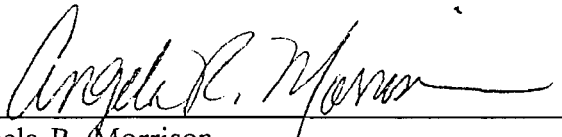
5. This request is filed simply as a protective measure to avoid waiver of Gulf's right to challenge certain conditions contained in the revised draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing.

6. Jeffrey Brown, Assistant General Counsel for the Department, was contacted by counsel for Gulf, and he had no objection to this request.

WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Revised Title V Air Operation Permit for Permit No. 0330045-001-AV (received on November 9, 1998) be formally extended to and including December 18, 1998. If the Department denies this request, Gulf requests the opportunity to file a Petition for Administrative Proceedings within 10 days of such denial.

Respectfully submitted this 19th day of November, 1998.

HOPPING GREEN SAMS & SMITH, P.A.



Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(904) 222-7500
Attorney for GULF POWER COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S. Mail on this 19th day of November, 1998:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Attorney

Jonathan Hatton

PENSACOLA News Journal

PUBLISHED DAILY

Pensacola, Escambia County, Florida

STATE OF FLORIDA
County of Escambia

Before the undersigned authority personally appeared

Kay Godwin

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 at Pensacola in Escambia County, Florida; that the attached copy of advertisement, being a Legal in the matter of

Public Notice

_____ in the _____ Court, was

published in said newspaper in the issues of

November 5, 1998

Affiant further says that the said Pensacola News Journal is a newspaper published at 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 16th day of Nov A.D. 19 98

Berdth Ferguson
Notary Public

BERDTH FERGUSON
Notary Public, State of Florida
My comm. expires Oct. 10, 2001
Comm. No. CC657980

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V Revised DRAFT Permit No.:0330045-001-AV
Crist Electric Generating Plant
Escambia County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Gulf Power Company for the Crist Electric Generating Plant located at Governor's Bayou, North of Pensacola, Escambia County. This permit incorporates the Phase I/II NOx standards into the Title IV Acid Rain Part pursuant to Rule 62-214.360(6), Florida Administrative Code (F.A.C.). The applicant's name and address are: Gulf Power Company, One Energy Place, Pensacola, Florida 32520.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change or terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulations, 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 results in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT 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 of the Florida Statutes (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 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 Section 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 (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, 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.

In addition to the above, 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 that were raised with resonable 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 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.

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/Local Program:
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8300
Fax: 850/595-4417

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.

Legal No. 56494 1T November 5, 1998

Department of Environmental Protection

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

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

October 29, 1998

Mr. Robert G. Moore
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0100

Re: Revised DRAFT Title V Permit No.: 0330045-001-AV
Crist Electric Generating Plant

Dear Mr. Moore:

One copy of the Revised DRAFT Title V Air Operation Permit for the Crist Electric Generating Plant located at Governor's Bayou, North of Pensacola, Escambia County, is enclosed. The previous DRAFT Title V Operation Permit dated October 2, 1997, and the Revised DRAFT Title V Operation Permit that was sent to you on October 2, 1998, are withdrawn. The enclosed version of the Revised DRAFT Title V Operation Permit contains some minor changes that were made pursuant to a request by Mr. Dwain Waters and is the version that will be made available for public inspection following publication of the public notice. Please replace the pages of the Revised DRAFT Title V Operation Permit that was sent to you on October 2 with the enclosed pages. A list of the changes that have been made is enclosed for your information. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" is also included.

The Department will publish the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" as soon as possible. This issue is important in order for you to receive your revised Title IV Acid Rain permit by January 1, 2000, for the inclusion of the Phase I/II NO_X limitations pursuant to Rule 62-214.360(6), Florida Administrative Code.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak, P.E., at the above letterhead address. If you have any other questions, please contact Jonathan Holtom, P.E. at 850/921-9531.

Sincerely,

for C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/h

Enclosures

cc: Ms. Carla E. Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)
Ms. Gracy Danois, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

In the Matter of an
Application for Permit by:

Gulf Power Company
One Energy Place
Pensacola, FL 32520-0100

Revised DRAFT Permit No.: 0330045-001-AV
Crist Electric Generating Plant
Escambia County

_____/

INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Gulf Power Company, applied on June 14, 1996, to the permitting authority for a Title V air operation permit for the Crist Electric Generating Plant located at Governor's Bayou, North of Pensacola, Escambia County. The applicant submitted the Phase I/II NO_x Acid Rain Compliance Plan on December 22, 1997. This permit incorporates the Phase I/II NO_x standards into the Title IV Acid Rain Part pursuant to Rule 62-214.360(6), Florida Administrative Code (F.A.C.).

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, 62-213, and 62-214. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation 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, 62-214, 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 TITLE V AIR OPERATION PERMIT." However, the Department will publish the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" as soon as possible. This issue is important in order for you to receive your Title IV Acid Rain Part by January 1, 2000, pursuant to Rule 62-214.360(6), Florida Administrative Code.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the attached Title V DRAFT 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 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE 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 Permit, the permitting authority shall issue a Revised DRAFT 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 (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 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 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 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 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.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

for C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the DRAFT permit) and all copies were sent by certified mail before the close of business on 11/3/98 to the person(s) listed:

Mr. Robert G. Moore, Gulf Power Company
Ms. Gail Kamaras, Legal Environmental Assistance Foundation

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the DRAFT permit) were sent by U.S. mail on the same date to the person(s) listed:

Mr. Kennard Kosky, P.E., Golder Associates
Mr. G. Dwain Waters, Gulf Power Company
Mr. Ed K. Middleswart, DEP, Northwest District Office

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. Bontwell 11/3/98
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V Revised DRAFT Permit No.: 0330045-001-AV
Crist Electric Generating Plant
Escambia County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Gulf Power Company for the Crist Electric Generating Plant located at Governor's Bayou, North of Pensacola, Escambia County. This permit incorporates the Phase I/II NO_x standards into the Title IV Acid Rain Part pursuant to Rule 62-214.360(6), Florida Administrative Code (F.A.C.). The applicant's name and address are: Gulf Power Company, One Energy Place, Pensacola, Florida 32520.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT 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 Title V DRAFT Permit issuance action for a period of 30 (thirty) 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 Permit, the permitting authority shall issue a Revised DRAFT 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 of the Florida Statutes (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 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 of the 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 or identification number, 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.

In addition to the above, 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 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.

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/Local Program:
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8300
Fax: 850/595-4417

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.

For Proposed determination

Crist Comments

- √ add Language for testing while injecting additives.
- √ correct cap plant to read 2000 – 2004 in table.
- √ Boiler 7 add 5H column
- √ Remove Add'l Reqmts from Cap Plan
- √ Rem. Note Re Startup / excess And the Δ
- √ correct Table 1-1 to reflect Heat Charg to 420 on #1 & 2

Clair, P.S

- Letter authorizing raise to 420 Pending effective date of J5

- add'l Language for SO_2 Compl. NO SOF Now by CEM's that they talked about

DEPARTMENT OF ENVIRONMENTAL PROTECTION
FLORIDA

1, 2, 3
desc. Sep 420/320
See SOB

A. 6. Note about Load chge ?
B. 6 ?
C. 6 ? Measured by M. W.

No Language

Drop Startup Appdx

Raise heat limit on 1 & 2 — Clair
by letter to district
See orig Memo !

Semi Annual Report ?

Smith - Force ?

420

$320 \frac{MMBtu}{h}$

$1000 \frac{Btu}{CF}$ $320{,}000 \frac{CF}{h}$

$550 \frac{lb}{10^6 CFT}$ $320 \Rightarrow 176 \frac{lb}{h}$

$420 \rightarrow 231 \frac{lb}{h}$

$\uparrow 55 \frac{lb}{h}$ $\uparrow \geq 40.9$ TPY

Jonathan Holtom

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

GULF POWER COMPANY,
Crist Plant,

Petitioner,

vs. OGC CASE NO. 97-1824

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

_____/

RECEIVED
OCT 13 1998
BUREAU OF
AIR REGULATION

ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, GULF POWER COMPANY, to grant an extension of time to file a petition for an administrative hearing on application No. 0330045-001-AV. See Exhibit 1.

Respondent, State of Florida Department of Environmental Protection, has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until December 1, 1998, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 12 day of October, 1998, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

F. PERRY ODOM
General Counsel

Douglas Building
3900 Commonwealth Boulevard
Mail Station #35
Tallahassee, FL. 32399-3000
Telephone: (850) 488-9314

CERTIFICATE OF SERVICE

I CERTIFY that a copy of the foregoing has been mailed to:

Angela R. Morrison, Esquire
HOPPING, GREEN, SAMS & SMITH, P.A.
Post Office Box 6526
Tallahassee, FL 32314-6526

on this 13 day of October, 1998.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

JEFFREY BROWN
Florida Bar No. 0843430
Assistant General Counsel

3900 Commonwealth Boulevard
Mail Station #35
Tallahassee, FL. 32399-3000
Telephone: (850) 488-9314

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

OGC No. 97-1824

Gulf Power Company
One Energy Place
Pensacola, FL 32520

DRAFT Permit No.: 0330045-001-AV
Crist Plant
Escambia County

/

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 62-110.106(4), an extension of time, to and including December 1, 1998, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, Gulf states the following:

1. On or about October 6, 1997, Gulf received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0330045-001-AV) for the Crist Plant located in Escambia County, Florida. Along with the Intent to Issue, Gulf received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."

2. By order dated June 25, 1998, the Department granted an extension of time until October 1, 1998, within which to file a petition for an administrative hearing.

3. The draft permit and associated documents contain several provisions that warrant clarification or correction.

4. Representatives of Gulf have corresponded and intend to continue to correspond with staff of the Department's Bureau of Air Regulation in an effort to resolve all issues.

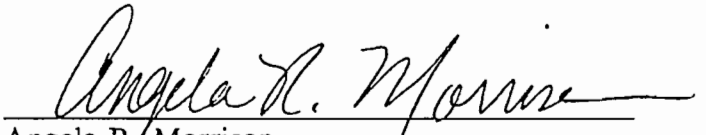
5. This request is filed simply as a protective measure to avoid waiver of Gulf's right to challenge certain conditions contained in the draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing.

6. Counsel for Gulf has attempted without success to contact Jeffrey Brown with the Office of General Counsel regarding this request.

WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0330045-001-AV be formally extended to and including December 1, 1998. If the Department denies this request, Gulf requests the opportunity to file a Petition for Administrative Proceedings within 10 days of such denial.

Respectfully submitted this 1st day of October, 1998.

HOPPING GREEN SAMS & SMITH, P.A.



Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(904) 222-7500

Attorney for GULF POWER COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S. Mail on this 1st day of October, 1998:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Angela R. Morrison
Attorney

Jonathan KST
Staff

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

Gulf Power Company
One Energy Place
Pensacola, FL 32520

/

OGC No. 97-1824

DRAFT Permit No.: 0330045-001-AV
Crist Plant
Escambia County

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Respectfully submitted this 1st day of October, 1998.

HOPPING GREEN SAMS & SMITH, P.A.

Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(904) 222-7500

Attorney for GULF POWER COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S. Mail on this 1st day of October, 1998:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Angela R. Morrison
Attorney

One Energy Place
Pensacola, Florida 32520

850.444.6111

GULF POWER
A SOUTHERN COMPANY

August 31 1998

Mr. Clair H. Fancy.
Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Dear Mr. Fancy:

RE: Plant Crist Title V Heat Input Correction
FDEP Draft Permit No: 0330045-001-AV

Background:

Gulf Power recently discovered that the heat input values previously requested in the Title V Permit Application for Crist 1 and Crist 2 are in error. These units started commercial operation in 1945 and 1949, respectively, and have a maximum rating of 28 mw. We believe these values have been in error since the 1970's and were miscalculated because the plant once burned "well head gas" that had a higher heating value of approximately 1326 btu/cf in lieu of natural gas at approximately 1000 btu/cf. Using the correct heating value for the gas flow results in a maximum heat input value of approximately 420 mmbtu/hr in lieu of the historically permitted 320 mmbtu/hr. The reason this error wasn't discovered earlier is because it wasn't possible to measure individual unit gas consumption until the installation of the acid rain monitoring provisions on these units. Historically, total gas flow for Crist Units 1-2-3 was measured at the gas header and only total gas consumption was recorded as required by our contract with the supplier. This amount was tracked to make sure that the total about of gas allotted per day wasn't exceeded. Additionally, only an average heat rate was tracked for these small gas and oil fired peaking units.

Proposal:

Gulf Power requests heat input values for Crist Unit 1 and Unit 2 be corrected in the Title V Permit Application based on the rated heat rate (mmbtu/kwh) documented in the EPA National Allowance Database (NADB) at the nameplate rating of each unit. To document actual heat rate, we have enclosed as Attachment One (1) the calculated average heat rates during the high operational years between 1970 to 1980. Since 1980, these units have operated as peaking units and therefore the calculated average heat rate is meaningless. The EPA NADB data

indicates a maximum heat rate at full load for these units at 14,700 mmbtu/kwh at a maximum rate of 28,000 kw. Therefore, the maximum heat input should be approximately 412 mmbtu/hr.

Conclusion:

Crist Unit 1 and Unit 2 are identical units having emission limitations for visible emissions (20%), particulate matter (.1 lb/mmbtu) and sulfur dioxide (1.98 lbs/mmbtu). The units have never been tested for particulate matter (thus no heat input), because the units have never operated more than 400 hours/year on oil. We do not believe the error in hear input affects our compliance with permit conditions because natural gas is considered a clean fuel with deminimus emissions. Attachment One (1) illustrates the average heat rate of Crist Unit 1 and 2 between 1970 and 1980 when they were operated as base load units. This heat rate averages 15,535 mmbtu/kwh and represents heat requirements over all operational loads. Attachment Two (2) are "well head gas" analyses during 1986. These are the earliest available fuel records due to our records retention program. Attachment Three (3) are revised applicable pages of the Crist Title V Permit Application with new certification statements addressing this request.

If you have any questions or if you need additional information, please call me at (850) 444-6527.

Sincerely,

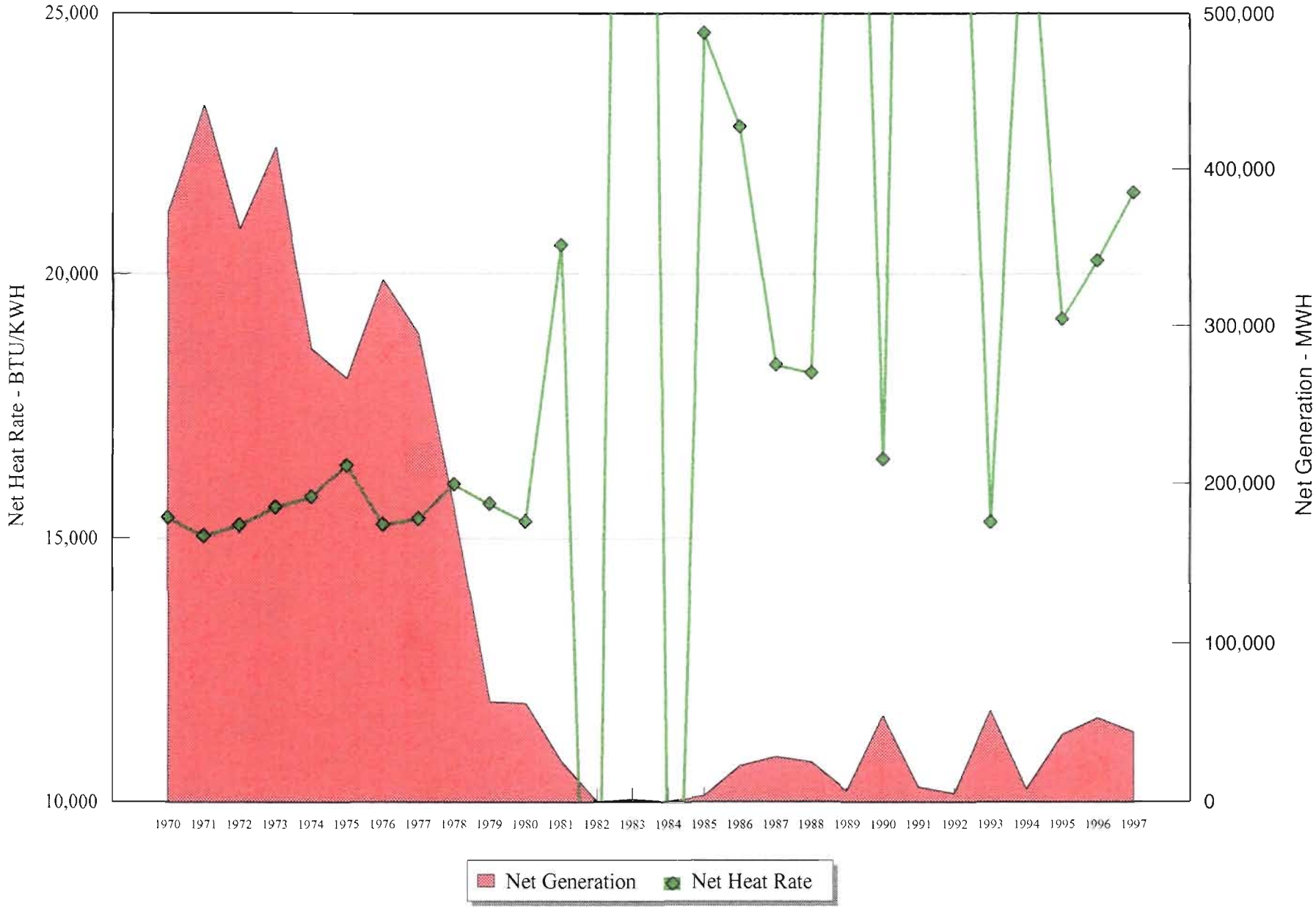
G. Dwain Waters, Q.E.P.
Air Quality Programs Coordinator

cc: Robert G. Moore, Gulf Power Company
James O Vick, Gulf Power Company
J. W. Martin, Gulf Power Company
John Dominey, Gulf Power Company
Danny Herrin, Southern Company Services

ATTACHMENT 1

	Year	Crist 1	Crist 2	Crist 3
	BTU Consumed - (Millions)			
BTU Consumed (Millions)	1970	1,913,297	1,913,297	1,913,297
	1971	2,214,310	2,214,310	2,214,310
	1972	1,839,591	1,839,591	1,839,591
	1973	2,152,326	2,152,326	2,152,326
	1974	1,500,163	1,500,163	1,500,163
	1975	1,451,597	1,451,597	1,451,597
	1976	1,675,766	1,675,766	1,675,766
	1977	1,509,557	1,509,557	1,509,557
	1978	986,559	986,559	986,559
	1979	328,858	328,858	328,858
	1980	317,880	317,880	317,880
	Net Generation - (MWH)			
Net Generation (MWH)	1970	124,347	124,347	124,347
	1971	147,243	147,243	147,243
	1972	120,703	120,703	120,703
	1973	138,204	138,204	138,204
	1974	95,184	95,184	95,184
	1975	88,830	88,830	88,830
	1976	109,853	109,853	109,853
	1977	98,273	98,273	98,273
	1978	61,711	61,711	61,711
	1979	21,036	21,036	21,036
	1980	20,765	20,765	20,765
	Net Heat Rate - (BTU/KWH)			
Net Heat Rate (BTU/KWH)	1970	15,387	15,387	15,387
	1971	15,038	15,038	15,038
	1972	15,241	15,241	15,241
	1973	15,574	15,574	15,574
	1974	15,761	15,761	15,761
	1975	16,341	16,341	16,341
	1976	15,255	15,255	15,255
	1977	15,361	15,361	15,361
	1978	15,987	15,987	15,987
	1979	15,633	15,633	15,633
	1980	15,309	15,309	15,309

Crist Unit 1, 2 and 3



These words are scheduled to be destroyed 12/98

E-570.4

PETROLEUM ANALYST INC.

ANALYTICAL CONSULTANTS

GAS ANALYSIS REPORT NO: 014-090486-01 DATE: 09-04-86

FOR: FIVE FLAGS PIPELINE
ATTN: CINDY NEAL
P.O. BOX 1062
PACE FL 32570

SAMPLE IDENTIFICATION:
COMPANY: FIVE FLAGS PIPELINE
FIELD: PACE FLORIDA
LEASE: MONSANTO

SAMPLE DATA: DATE: 08-29-86 BY:
PSIG: 80 TEMP: 98 DEG.F. GRAV:
MCF/D: DIF: IN. DP: LBS H2O

REMARKS: SAMPLED FROM 07-29-86 TO 08-29-86.

CYL # 1021

COMPONENT ANALYSIS

COMPONENT		MOL PERCENT	GPM @ 14.696 PSIA
CARBON DIOXIDE	(CO2)	0.06	
NITROGEN	(N2)	5.04	
METHANE	(C1)	39.90	
ETHANE	(C2)	51.08	13.630
PROPANE	(C3)	3.26	0.896
ISO-BUTANE	(IC4)	0.25	0.082
N-BUTANE	(NC4)	0.30	0.094
ISO-PENTANE	(IC5)	0.05	0.018
N-PENTANE	(NC5)	0.04	0.014
HEXANES PLUS	(C6+)	0.02	0.008
TOTAL		100.00	

ETHANE + GPM	14.742
ISO-PENTANE + GPM	0.040
COMPRESSIBILITY FACTOR	0.9949
SPECIFIC GRAVITY @ 60 DEG. F. (AIR = 1)	0.869
BTU/CU. FT. @ 60 DEG. F., 14.650 PSIA DRY	1414.3
WET	1389.5

PETROLEUM ANALYST INC.

ANALYTICAL CONSULTANTS

GAS ANALYSIS REPORT NO: 010-090486-01 DATE: 09-04-86

FOR: FIVE FLAGS PIPELINE
ATTN: CINDY NEAL
P.O. BOX 1062
PACE FL. 32570

SAMPLE IDENTIFICATION:
COMPANY: FIVE FLAGS PIPELINE
FIELD: PACE FLORIDA
LEASE: GULF POWER

SAMPLE DATA: DATE: 08-29-86 BY:
PSIG: 35 TEMP: 56 DEG.F. GRAV:
MCF/D: DIF: IN. DP: LBS H2O

REMARKS: SAMPLED FROM 07-29-86 TO 08-29-86.

CYL # 1019

COMPONENT ANALYSIS

COMPONENT		MOL PERCENT	GPM @ 14.696 PSIA
CARBON DIOXIDE	(CO2)	0.06	
NITROGEN	(N2)	5.06	
METHANE	(C1)	39.64	
ETHANE	(C2)	52.58	14.030
PROPANE	(C3)	1.99	0.547
ISO-BUTANE	(IC4)	0.23	0.075
N-BUTANE	(NC4)	0.32	0.101
ISO-PENTANE	(IC5)	0.06	0.022
N-PENTANE	(NC5)	0.05	0.018
HEXANES PLUS	(C6+)	0.01	0.004
TOTAL		100.00	

ETHANE + GPM		14.797
ISO-PENTANE + GPM		0.044
COMPRESSIBILITY FACTOR		0.9949
SPECIFIC GRAVITY @ 60 DEG. F. (AIR = 1)		0.864
BTU/CU. FT. @ 60 DEG. F., 14.650 PSIA	DRY	1406.5
	WET	1381.9

PETROLEUM ANALYST INC.

ANALYTICAL CONSULTANTS

GAS ANALYSIS REPORT NO: 027-090486-01 DATE: 09-04-86

FOR: FIVE FLAGS PIPELINE
ATTN: CINDY NEAL
P.O. BOX 1062
PACE FL 32570

SAMPLE IDENTIFICATION:
COMPANY: FIVE FLAGS PIPELINE
FIELD: PACE FLORIDA
LEASE: GAS TRANSPORTATION

SAMPLE DATA: DATE: 08-29-86 BY:
PSIG: 50 TEMP: 120 DEG.F. GRAV:
MCF/D: DIF: IN. DP: LBS H2O

REMARKS: SPOT SAMPLE.

CYL # 1025

COMPONENT ANALYSIS

COMPONENT		MOL PERCENT	GPM @ 14.696 PSIA
CARBON DIOXIDE	(CO2)	0.71	
NITROGEN	(N2)	5.08	
METHANE	(C1)	71.45	
ETHANE	(C2)	11.35	3.029
PROPANE	(C3)	5.67	1.559
ISO-BUTANE	(IC4)	1.13	0.369
N-BUTANE	(NC4)	2.55	0.802
ISO-PENTANE	(IC5)	0.68	0.248
N-PENTANE	(NC5)	0.73	0.264
HEXANES PLUS	(C6+)	0.65	0.280
TOTAL		100.00	

ETHANE + GPM		6.551
ISO-PENTANE + GPM		0.792
COMPRESSIBILITY FACTOR		0.9959
SPECIFIC GRAVITY @ 60 DEG. F. (AIR = 1)		0.793
BTU/CU. FT. @ 60 DEG. F., 14.650 PSIA	DRY	1275.9
	WET	1253.6

PETROLEUM ANALYST INC.

ANALYTICAL CONSULTANTS

GAS ANALYSIS REPORT NO: 011-090486-01 DATE: 09-04-86

FOR: FIVE FLAGS PIPELINE
ATTN: CINDY NEAL
P.O. BOX 1062
PACE FL 32570

SAMPLE IDENTIFICATION:
COMPANY: FIVE FLAGS PIPELINE
FIELD: PACE FLORIDA
LEASE: AIR PRODUCTS

SAMPLE DATA: DATE: 08-29-86 BY: J. H.
PSIG: 44 TEMP: 66 DEG.F. GRAV:
MCF/D: DIF: IN. DP: LBS H2O

REMARKS: COMPOSITE SAMPLE FROM 07-29-86 TO 08-29-86.

CYL # 1017

COMPONENT ANALYSIS

COMPONENT		MOL PERCENT	GPM @ 14.696 PSIA
CARBON DIOXIDE	(CO2)	0.05	
NITROGEN	(N2)	4.87	
METHANE	(C1)	39.36	
ETHANE	(C2)	53.27	14.214
PROPANE	(C3)	1.85	0.509
ISO-BUTANE	(IC4)	0.21	0.069
N-BUTANE	(NC4)	0.30	0.094
ISO-PENTANE	(IC5)	0.05	0.018
N-PENTANE	(NC5)	0.04	0.014
HEXANES PLUS	(C6+)	0.00	0.000
TOTAL		100.00	

ETHANE + GPM		14.918
ISO-PENTANE + GPM		0.032
COMPRESSIBILITY FACTOR		0.9949
SPECIFIC GRAVITY @ 60 DEG. F. (AIR = 1)		0.864
BTU/CU. FT. @ 60 DEG. F., 14.650 PSIA	DRY	1409.8
	WET	1385.1

~~L.W.~~

F-570.4

PETROLEUM ANALYST INC.

ANALYTICAL CONSULTANTS

GAS ANALYSIS REPORT NO: 011-080186-01 DATE: 08-01-86

FOR: FIVE FLAGS PIPELINE
ATTN: CINDY NEAL
P.O. BOX 1062
PACE FL 32570

SAMPLE IDENTIFICATION:
COMPANY: FIVE FLAGS PIPELINE
FIELD: PACE FLORIDA
LEASE: AIR PRODUCTS

SAMPLE DATA: DATE: 07-29-86 BY: T. P.
PSIG: 40 TEMP: 82 DEG.F. GRAV:
MCF/D: DIF: IN. DP: LBS H2O

REMARKS: COMPOSITE SAMPLE FROM 06-30-86 TO 07-29-86.

CYL # 1018

COMPONENT ANALYSIS

COMPONENT		MOL PERCENT	GPM @ 14.696 PSIA
CARBON DIOXIDE	(CO2)	0.06	
NITROGEN	(N2)	5.57	
METHANE	(C1)	34.87	
ETHANE	(C2)	56.33	15.031
PROPANE	(C3)	2.46	0.676
ISO-BUTANE	(IC4)	0.24	0.078
N-BUTANE	(NC4)	0.34	0.107
ISO-PENTANE	(IC5)	0.07	0.026
N-PENTANE	(NC5)	0.05	0.018
HEXANES PLUS	(C6+)	0.01	0.004
TOTAL		100.00	

ETHANE + GPM	15.940
ISO-PENTANE + GPM	0.049
COMPRESSIBILITY FACTOR	0.9946
SPECIFIC GRAVITY @ 60 DEG. F. (AIR = 1)	0.690
BTU/CU. FT. @ 60 DEG. F., 14.650 PSIA DRY	1438.4
WET	1413.2

PETROLEUM ANALYST INC.

ANALYTICAL CONSULTANTS

GAS ANALYSIS REPORT NO: 010-080186-01 DATE: 08-01-86

FOR: FIVE FLAGS PIPELINE
ATTN: CINDY NEAL
P.O. BOX 1062
PACE FL 32570

SAMPLE IDENTIFICATION:
COMPANY: FIVE FLAGS PIPELINE
FIELD: PACE FLORIDA
LEASE: GULF POWER

SAMPLE DATA: DATE: 07-29-86 BY: T. P.
PSIG: 35 TEMP: 81 DEG.F. GRAV:
MCF/D: DIF: IN. DP: LBS H2O

REMARKS: COMPOSITE SAMPLE FROM 06-30-86 TO 07-29-86.

CYL # 1020

COMPONENT ANALYSIS

COMPONENT		MOL PERCENT	GPM @ 14.696 PSIA
CARBON DIOXIDE	(CO2)	0.08	
NITROGEN	(N2)	5.21	
METHANE	(C1)	40.57	
ETHANE	(C2)	51.36	13.705
PROPANE	(C3)	2.06	0.566
ISO-BUTANE	(IC4)	0.24	0.078
N-BUTANE	(NC4)	0.34	0.107
ISO-PENTANE	(IC5)	0.07	0.026
N-PENTANE	(NC5)	0.06	0.022
HEXANES PLUS	(C6+)	0.01	0.004
TOTAL		100.00	

ETHANE + GPM	14.508
ISO-PENTANE + GPM	0.052
COMPRESSIBILITY FACTOR	0.9950
SPECIFIC GRAVITY @ 60 DEG. F. (AIR = 1)	0.860
BTU/CU. FT. @ 60 DEG. F., 14.650 PSIA DRY	1347.7
WET	1323.3

PETROLEUM ANALYST INC.

ANALYTICAL CONSULTANTS

GAS ANALYSIS REPORT NO: 006-080186-01 DATE: 08-01-86

FOR: FIVE FLAGS PIPELINE
ATTN: CINDY NEAL
P.O. BOX 1062
PACE FL 32570

SAMPLE IDENTIFICATION:
COMPANY: FIVE FLAGS PIPELINE
FIELD: PACE FLORIDA
LEASE: CHAMPION METER STA.

SAMPLE DATA: DATE: 07-29-86 BY: T. P.
PSIG: 80 TEMP: 118 DEG.F. GRAV:
MCF/D: DIF: IN. DP: LBS H2O

REMARKS: COMPOSITE SAMPLE FROM 06-30-86 TO 07-29-86.

CYL # 1024

COMPONENT ANALYSIS

COMPONENT		MOL PERCENT	GPM @ 14.696 PSIA
CARBON DIOXIDE	(CO2)	0.06	
NITROGEN	(N2)	4.65	
METHANE	(C1)	39.09	
ETHANE	(C2)	53.19	14.193
PROPANE	(C3)	2.36	0.649
ISO-BUTANE	(IC4)	0.24	0.078
N-BUTANE	(NC4)	0.31	0.098
ISO-PENTANE	(IC5)	0.05	0.018
N-PENTANE	(NC5)	0.04	0.014
HEXANES PLUS	(C6+)	0.01	0.004
TOTAL		100.00	

ETHANE + GPM		15.054
ISO-PENTANE + GPM		0.036
COMPRESSIBILITY FACTOR		0.9948
SPECIFIC GRAVITY @ 60 DEG. F. (AIR = 1)		0.869
BTU/CU. FT. @ 60 DEG. F., 14.650 PSIA	DRY	1420.4
	WET	1395.6

PETROLEUM ANALYST INC.

ANALYTICAL CONSULTANTS

GAS ANALYSIS REPORT NO: 003-080186-01 DATE: 08-01-86

FOR: FIVE FLAGS PIPELINE
ATTN: CINDY NEAL
P.O. BOX 1062
PACE FL 32570

SAMPLE IDENTIFICATION:
COMPANY: FIVE FLAGS PIPELINE
FIELD: PACE FLORIDA
LEASE: GAS TRANSPORTATION

SAMPLE DATA: DATE: 07-29-86 BY: T. P.
PSIG: 50 TEMP: 114 DEG.F. GRAV:
MCF/D: DIF: IN. DP: LBS H2O

REMARKS: COMPOSITE SAMPLE FROM 06-30-86 TO 07-29-86.

CYL # 1026

COMPONENT ANALYSIS

COMPONENT		MOL PERCENT	GPM @ 14.696 PSIA
CARBON DIOXIDE	(CO2)	0.15	
NITROGEN	(N2)	5.10	
METHANE	(C1)	71.90	
ETHANE	(C2)	11.41	3.045
PROPANE	(C3)	5.71	1.570
ISO-BUTANE	(IC4)	1.16	0.379
N-BUTANE	(NC4)	2.63	0.827
ISO-PENTANE	(IC5)	0.71	0.259
N-PENTANE	(NC5)	0.76	0.275
HEXANES PLUS	(C6+)	0.47	0.202
TOTAL		100.00	

ETHANE + GPM		6.557
ISO-PENTANE + GPM		0.736
COMPRESSIBILITY FACTOR		0.9960
SPECIFIC GRAVITY @ 60 DEG. F. (AIR = 1)		0.786
BTU/CU. FT. @ 60 DEG. F., 14.650 PSIA	DRY	1279.2
	WET	1256.9

PETROLEUM ANALYST INC.

ANALYTICAL CONSULTANTS

GAS ANALYSIS REPORT NO: 005-070786-01 DATE: 07-07-86

FOR: FIVE FLAGS PIPELINE
ATTN: CINDY NEAL
P.O. BOX 1062
PACE FL 32570

SAMPLE IDENTIFICATION:
COMPANY: FIVE FLAGS PIPELINE
FIELD: PACE FLORIDA
LEASE: GULF POWER

SAMPLE DATA: DATE: 06-30-86 BY: V. H.
PSIG: 34 TEMP: 102 DEG.F. GRAV:
MCF/D: DIF: IN. DP: LBS H2O

REMARKS: SAMPLE FROM 05-29-86 TO 06-30-86

CYL # 1019

COMPONENT ANALYSIS

COMPONENT		MOL PERCENT	GPM @ 14.696 PSIA
CARBON DIOXIDE	(CO2)	0.09	
NITROGEN	(N2)	4.76	
METHANE	(C1)	28.67	
ETHANE	(C2)	64.60	17.238
PROPANE	(C3)	1.41	0.388
ISO-BUTANE	(IC4)	0.16	0.052
N-BUTANE	(NC4)	0.21	0.066
ISO-PENTANE	(IC5)	0.05	0.018
N-PENTANE	(NC5)	0.04	0.014
HEXANES PLUS	(C6+)	0.01	0.004
TOTAL		100.00	

ETHANE + GPM	17.780
ISO-PENTANE + GPM	0.036
COMPRESSIBILITY FACTOR	0.9942
SPECIFIC GRAVITY @ 60 DEG. F. (AIR = 1)	0.914
BTU/CU. FT. @ 60 DEG. F.. 14.650 PSIA DRY	1466.4
WET	1462.3

PETROLEUM ANALYST INC.

ANALYTICAL CONSULTANTS

GAS ANALYSIS REPORT NO: 030-070386-01 DATE: 07-03-86

FOR: FIVE FLAGS PIPELINE
ATTN: CINDY NEAL
P.O. BOX 1062
PACE FL 32570

SAMPLE IDENTIFICATION:
COMPANY: FIVE FLAGS PIPELINE
FIELD: PACE FLORIDA
LEASE: AIR PRODUCTS

SAMPLE DATA: DATE: 06-30-86 BY: V. H.
PSIG: 52 TEMP: 81 DEG.F. GRAV:
MCF/D: DIF: IN. DP: LBS H2O

REMARKS: SAMPLE FROM 05-29-86 TO 06-30-86.

CYL # 1017

COMPONENT ANALYSIS

COMPONENT		MOL PERCENT	GPM @ 14.696 PSIA
CARBON DIOXIDE	(CO2)	0.08	
NITROGEN	(N2)	5.15	
METHANE	(C1)	28.65	
ETHANE	(C2)	63.87	17.043
PROPANE	(C3)	1.80	0.495
ISO-BUTANE	(IC4)	0.17	0.055
N-BUTANE	(NC4)	0.21	0.066
ISO-PENTANE	(IC5)	0.04	0.015
N-PENTANE	(NC5)	0.03	0.011
HEXANES PLUS	(C6+)	0.00	0.000
TOTAL		100.00	

ETHANE + GPM	17.685
ISO-PENTANE + GPM	0.026
COMPRESSIBILITY FACTOR	0.9942
SPECIFIC GRAVITY @ 60 DEG. F. (AIR = 1)	0.915
BTU/CU. FT. @ 60 DEG. F., 14.650 PSIA DRY	1484.1
WET	1458.1

PETROLEUM ANALYST INC.

ANALYTICAL CONSULTANTS

GAS ANALYSIS REPORT NO: 027-070386-01 DATE: 07-03-86

FOR: FIVE FLAGS PIPELINE
ATTN: CINDY NEAL
P.O. BOX 1062
PACE FL 32570

SAMPLE IDENTIFICATION:
COMPANY: FIVE FLAGS PIPELINE
FIELD: PACE FLORIDA
LEASE: CHAMPION METER STA.

SAMPLE DATA: DATE: 06-30-86 BY: V. H.
PSIG: 80 TEMP: 104 DEG.F. GRAV:
MCF/D: DIF: IN. DP: LBS H2O

REMARKS: SAMPLE FROM 05-29-86 TO 06-30-86.

CYL # 1023

COMPONENT ANALYSIS

COMPONENT		MOL PERCENT	GPM @ 14.696 PSIA
CARBON DIOXIDE	(CO2)	0.08	
NITROGEN	(N2)	5.09	
METHANE	(C1)	35.91	
ETHANE	(C2)	55.66	14.852
PROPANE	(C3)	2.68	0.737
ISO-BUTANE	(IC4)	0.21	0.069
N-BUTANE	(NC4)	0.27	0.085
ISO-PENTANE	(IC5)	0.05	0.018
N-PENTANE	(NC5)	0.04	0.014
HEXANES PLUS	(C6+)	0.01	0.004
TOTAL		100.00	

ETHANE + GPM	15.779
ISO-PENTANE + GPM	0.036
COMPRESSIBILITY FACTOR	0.9946
SPECIFIC GRAVITY @ 60 DEG. F. (AIR = 1)	0.885
BTU/CU. FT. @ 60 DEG. F., 14.650 PSIA DRY	1438.1
WET	1413.0

PETROLEUM ANALYST INC.

ANALYTICAL CONSULTANTS

GAS ANALYSIS REPORT NO: 026-070386-02 DATE: 07-03-86

FOR: FIVE FLAGS PIPELINE
ATTN: CINDY NEAL
P.O. BOX 1062
PACE FL 32570

SAMPLE IDENTIFICATION:
COMPANY: FIVE FLAGS PIPELINE
FIELD: PACE FLORIDA
LEASE: GAS TRANSPORTATION

SAMPLE DATA: DATE: 06-30-86 BY: V. H.
PSIG: 50 TEMP: 120 DEG.F. GRAV:
MCF/D: DIF: IN. DP: LBS H2O

REMARKS: SAMPLE FROM 05-29-86 TO 06-30-86.

CYL # 1025

COMPONENT ANALYSIS

COMPONENT		MOL PERCENT	GPM @ 14.696 PSIA
CARBON DIOXIDE	(CO2)	0.18	
NITROGEN	(N2)	4.96	
METHANE	(C1)	71.20	
ETHANE	(C2)	11.56	3.085
PROPANE	(C3)	5.61	1.542
ISO-BUTANE	(IC4)	1.19	0.388
N-BUTANE	(NC4)	2.71	0.852
ISO-PENTANE	(IC5)	0.80	0.292
N-PENTANE	(NC5)	0.90	0.325
HEXANES PLUS	(C6+)	0.89	0.383
TOTAL		100.00	

ETHANE + GPM		6.867
ISO-PENTANE + GPM		1.000
COMPRESSIBILITY FACTOR		0.9958
SPECIFIC GRAVITY @ 60 DEG. F. (AIR = 1)		0.803
BTU/CU. FT. @ 60 DEG. F., 14.650 PSIA	DRY	1306.8
	WET	1283.9

PETROLEUM ANALYST INC.

ANALYTICAL CONSULTANT

GAS ANALYSIS REPORT NO: 029-070386-01 DATE: 07-03-86

FOR: FIVE FLAGS PIPELINE
ATTN: CINDY NEAL
P.O. BOX 1062
PACE FL 32570

SAMPLE IDENTIFICATION:
COMPANY: FIVE FLAGS PIPELINE
FIELD: PACE FLORIDA
LEASE: MONSANTO

SAMPLE DATA: DATE: 06-30-86 BY: V. H.
PSIG: 60 TEMP: 103 DEG.F. GRAV:
MCF/D: DIF: IN. DP: LBS H2O

REMARKS: SAMPLE FROM 05-29-86 TO 06-30-86.

CYL # 1021

COMPONENT ANALYSIS

COMPONENT		MOL PERCENT	GPM @ 14.696 PSIA
CARBON DIOXIDE	(CO2)	0.08	
NITROGEN	(N2)	4.90	
METHANE	(C1)	27.39	
ETHANE	(C2)	62.94	16.795
PROPANE	(C3)	3.91	1.075
ISO-BUTANE	(IC4)	0.26	0.085
N-BUTANE	(NC4)	0.37	0.116
ISO-PENTANE	(IC5)	0.07	0.026
N-PENTANE	(NC5)	0.06	0.022
HEXANES PLUS	(C6+)	0.02	0.009
TOTAL		100.00	

ETHANE + GPM	18.128
ISO-PENTANE + GPM	0.057
COMPRESSIBILITY FACTOR	0.9939
SPECIFIC GRAVITY @ 60 DEG. F. (AIR = 1)	0.936
BTU/CU. FT. @ 60 DEG. F., 14.650 PSIA DRY	1520.1
WET	1493.5

PETROLEUM ANALYST INC.

ANALYTICAL CONSULTANTS

GAS ANALYSIS REPORT NO: 009-060286-02 DATE: 06-02-86

FOR: FIVE FLAGS PIPELINE
ATTN: CINDY NEAL
P.O. BOX 1062
PACE FL 32570

SAMPLE IDENTIFICATION:
COMPANY: FIVE FLAGS PIPELINE
FIELD: PACE FLORIDA
LEASE: CHAMPION METER STA.

SAMPLE DATA: DATE: 05-29-86 BY: JCM
PSIG: 82 TEMP: 90 DEG.F. GRAV:
MCF/D: DIF: IN. DP: LBS H2O

REMARKS: SAMPLED FROM 04-29-86 TO 05-29-86.

CYL # 1024

COMPONENT ANALYSIS

COMPONENT		MOL PERCENT	GPM @ 14.696 PSIA
CARBON DIOXIDE	(CO2)	0.07	
NITROGEN	(N2)	5.59	
METHANE	(C1)	47.09	
ETHANE	(C2)	44.50	11.874
PROPANE	(C3)	2.03	0.558
ISO-BUTANE	(IC4)	0.28	0.091
N-BUTANE	(NC4)	0.35	0.110
ISO-PENTANE	(IC5)	0.05	0.018
N-PENTANE	(NC5)	0.04	0.014
HEXANES PLUS	(C6+)	0.00	0.000
TOTAL		100.00	

ETHANE + GPM	12.665
ISO-PENTANE + GPM	0.032
COMPRESSIBILITY FACTOR	0.9955
SPECIFIC GRAVITY @ 60 DEG. F. (AIR = 1)	0.827
BTU/CU. FT. @ 60 DEG. F., 14.650 PSIA DRY	1340.1
WET	1316.7

ATTACHMENT 3

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official :

Name : Robert G. Moore
Title : V.P. Power Generation/Transmission

2. Owner or Authorized Representative or Responsible Official Mailing Address :

Organization/Firm : Gulf Power Company
Street Address : One Energy Place
City : Pensacola
State : FL Zip Code : 32520-0100

3. Owner/Authorized Representative or Responsible Official Telephone Numbers :

Telephone : (850)444-6383 Fax : (850)444-6744

4. Owner/Authorized Representative or Responsible Official Statement :

I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. 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. 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 any permitted emissions units.*

Robert G. Moore
Signature

9/1/98
Date

* Attach letter of authorization if not currently on file.

F. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Crist Plant Unit 1 Electric Utility Boiler

Segment Description and Rate : Segment 1

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Boiler fired with natural gas. Emissions related to million cubic feet gas consumed.	
2. Source Classification Code (SCC) : 1-01-006-01	
3. SCC Units : Million Cubic Feet Burned (all gaseous fuels)	
4. Maximum Hourly Rate : ~~=0.32~~ .412	5. Maximum Annual Rate : ~~=2,803.20~~ 3,609.12
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : 0.01	8. Maximum Percent Ash : 0.00
9. Million Btu per SCC Unit : 1,000	
10. Segment Comment : Unit 1 considered primarily a natural gas fired unit under EPA Title IV definitions.	

C. EMISSIONS UNIT DETAIL INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Information Section 1
Crist Plant Unit 1 Electric Utility Boiler

Emissions Unit Details

1. Initial Startup Date :	01-Jan-1945
2. Long-term Reserve Shutdown Date :	
3. Package Unit : Manufacturer :	Model Number :
4. Generator Nameplate Rating :	28 MW
5. Incinerator Information : Dwell Temperature : Dwell Time : Incinerator Afterburner Temperature :	 Degrees Fahrenheit Seconds Degrees Fahrenheit

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate :	~~320~~ 411	mmBtu/hr	
2. Maximum Incinerator Rate :		lb/hr	tons/day
3. Maximum Process or Throughput Rate :			
4. Maximum Production Rate :			
5. Operating Capacity Comment : Unit is capable of full load operations using natural gas, #6 fuel and #2 fuel oil. The maximum heat input rate in item 1 is an estimated design rate using natural gas as determined by fuel sampling and anaylsis. Actual heat input rates may be higher.			

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule :	
24 hours/day	7 days/week
52 weeks/year	8,760 hours/year

C. EMISSIONS UNIT DETAIL INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Information Section 2
Crist Plant Unit 2 Electric Utiltity boiler

Emissions Unit Details

1. Initial Startup Date :	01-Jun-1949
2. Long-term Reserve Shutdown Date :	
3. Package Unit : Manufacturer :	Model Number :
4. Generator Nameplate Rating : 28 MW	
5. Incinerator Information : Dwell Temperature : Dwell Time : Incinerator Afterburner Temperature :	 Degrees Fahrenheit Seconds Degrees Fahrenheit

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate :	~~320~~ 412	mmBtu/hr	
2. Maximum Incinerator Rate :		lb/hr	tons/day
3. Maximum Process or Throughput Rate :			
4. Maximum Production Rate :			
5. Operating Capacity Comment : Unit is capable of full load operations using natural gas, #6 fuel and #2 fuel oil. The maximum heat input rate in item 1 is an estimated design rate using natural gas as determined by fuel sampling and anaylsis. Actual heat input rates may be higher.			

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule :	
24 hours/day	7 days/week
52 weeks/year	8,760 hours/year

F. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 2

Crist Plant Unit 2 Electric Utiltity boiler

Segment Description and Rate : Segment 1

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Boiler fired with natural gas. Emissions related to million cubic feet gas consumed.	
2. Source Classification Code (SCC) : 1-01-006-01	
3. SCC Units : Million Cubic Feet Burned (all gaseous fuels)	
4. Maximum Hourly Rate : ~~0.32~~ .412	5. Maximum Annual Rate : ~~2,803.00~~ 3,609.12
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : 0.01	8. Maximum Percent Ash : 0.00
9. Million Btu per SCC Unit : 1,000	
10. Segment Comment : Unit considered primarily a natural gas fired unit under EPA Title IV definitions.	

One Energy Place
Pensacola, Florida 32520

850.444.6111

Post-it® Fax Note 7671	Date	# of pages ▶ 2
To JONATHAN Holtom	From CHARLES NORMAN	
Co./Dept. DARM	Co. NWD/ARM	
Phone # 488-1344	Phone # SC 695-8364	
Fax # SC 292-6979	Fax # SC 695-8597	

GULF POWER
A SOUTHERN COMPANY

August 24, 1998

Mr. Ed Middleswart
Florida Department of Environmental Protection
160 Governmental Center
Pensacola, FL 32501-5794

Dear Mr. Middleswart: :

RE: PLANT CRIST 1-2-3 (AO17-249656)
AIR INSPECTION – AUGUST 13, 1998

This letter is in response to issues identified during a compliance inspection of Gulf Power's Crist Plant on August 13, 1998. Two issues of concern were discussed in the inspection exit interview with Charles Norman: These issues are: the hourly heat input recorded on Crist Unit 1 and the operation of spray curtains at the fly ash silo during wet ash loading of the trucks.

In regards to the heat input issue on Crist Unit 1, our research indicates that there was an error of about 15% in the calibration and calculation of the hourly gas flow that resulted in abnormally high hourly heat input values for the unit. Additionally, it was discovered that there is an error in the appropriate heat input value needed for full load of the unit. A corrective action plan is being implemented to identify these values, and Clair Fancy (FDEP – Tallahassee) has been notified of this situation in order to correct the hourly heat input values in Crist Plant's Title V draft permit. Historically, Gulf Power recorded total gas flow to Crist Units 1-2-3 at the gas header and only monitored total consumption as required by our contract with the gas supplier. Our research also indicates that our 1970's gas supplier used "well head gas" that had a higher heating value of 1326 btu/cf in lieu of today's natural gas of approximately 1000 btu/cf. Gulf Power was unaware of the problem with the change in heating values that were originally used to develop the permit design limits in the 1970's, and the design gas flow and heat input values were incorrectly carried forwarded in renewal permits to date. We do not feel that the error in heat input affects our compliance of permit parameters for SO2 or Particulate because natural gas is considered a clean fuel with deminus emissions.

In regards to the operation of the flyash storage silos loading system, at least one spray curtain will be operated during the loading of wet flyash. Based on Mr. Norman's recommendation, the flyash spray curtains will be operated during the loading of the flyash to open dump trucks even though the ash is wet when loaded in this type of truck. The loading of sufficiently wet fly ash should adequately control fugitive emissions from the loading area, but the operation of the spray curtains will be added to the standard operating procedure of this system to ensure this adequate control.

If you should have any questions or need more information regarding these issues, please call me at 444-6527 or Lonnie Noack at 444-6152.

Sincerely,

G. Dwain Waters, QEP

G. Dwain Waters, QEP
Air Quality Program Coordinator

Cc: Lonnie Noack
John Dominey
Joe Martin
Jay Westin
Jim Vick
Robert Moore
Greg Terry

$$\frac{320 \frac{MMBTU}{hr}}{1326 \frac{BTU}{CF}} = 241 \times 10^3 \frac{CF}{hr}$$

$$\frac{320 \frac{MMBTU}{hr}}{1000 \frac{BTU}{CF}} = 320 \times 10^3 \frac{CF}{hr}$$

} increase of $79{,}000 \frac{CF}{hr}$ to maintain permitted heat input.

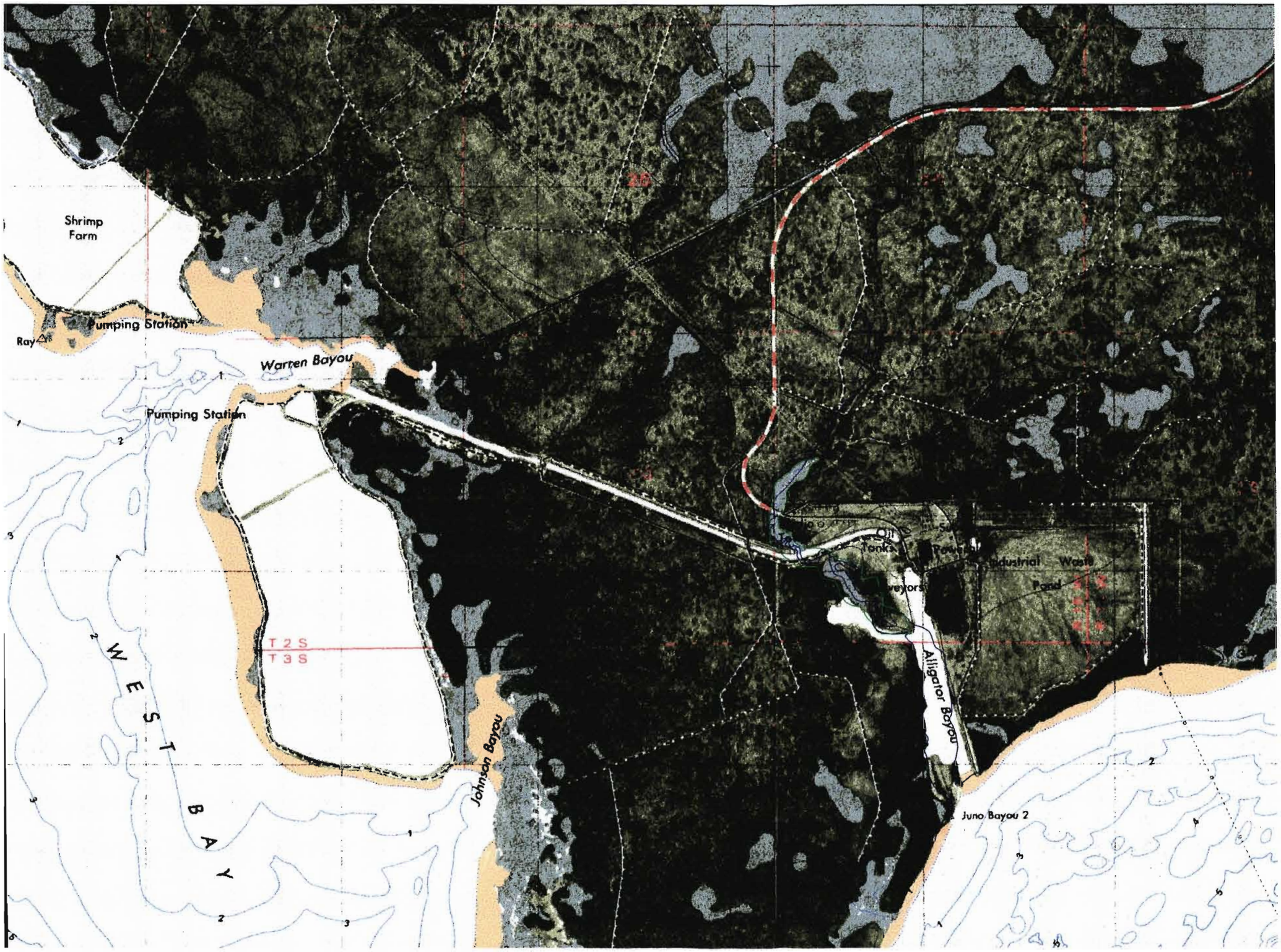
Charles Norman:

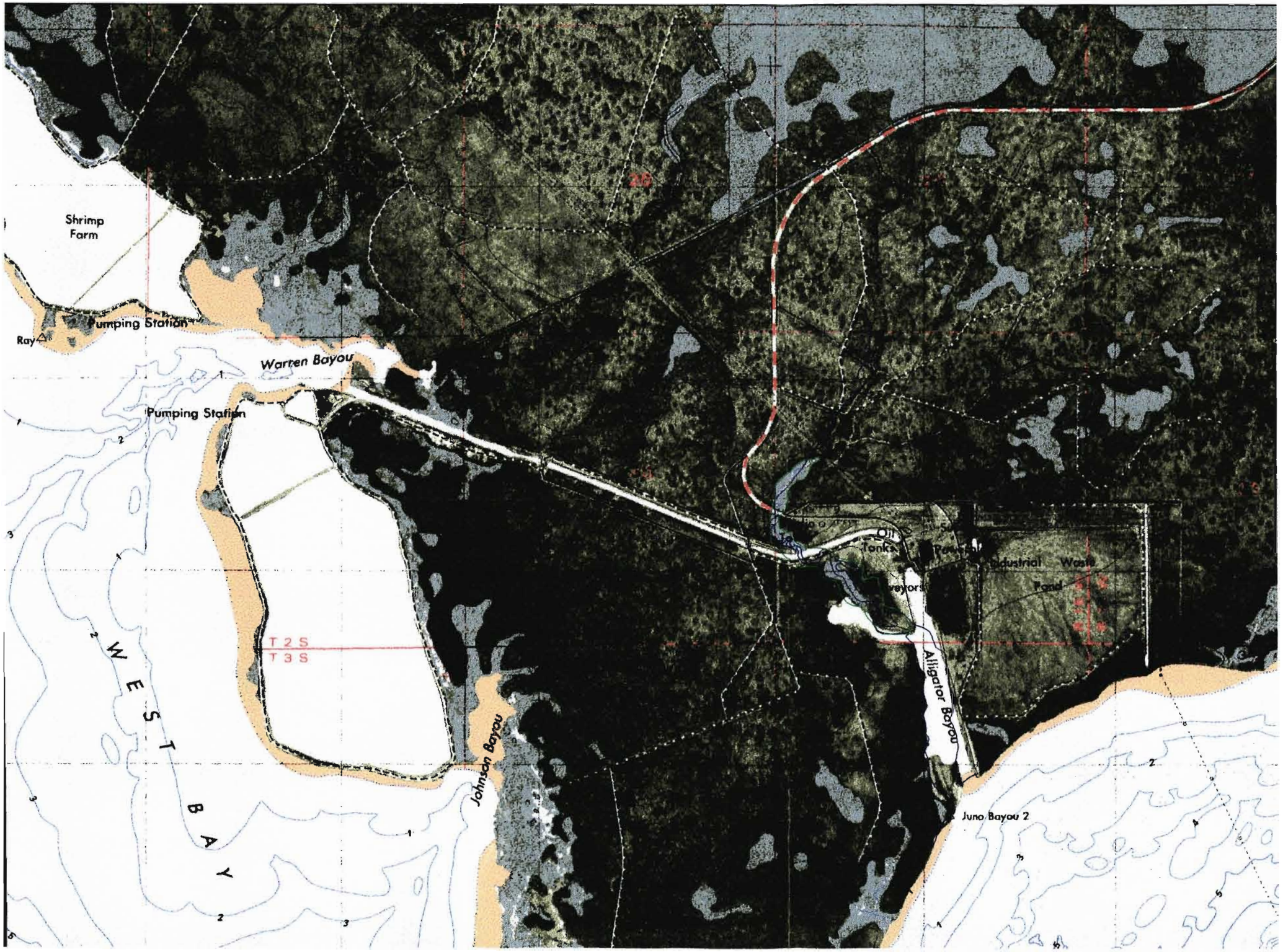
Daily gas emission report

July 6 #1 419.3 $\frac{MMBTU}{hr}$

Fly ash water curtain not operating

12 of 14 nozzles plugged.


Shrimp
Farm
Pumping Station
Ray
Warren Bayou
Pumping Station
WEST BAY
T 2 S
T 3 S
Johnson Bayou
Oil
Tanks
Industrial
Waste
Pond
Alligator Bayou
Juno Bayou 2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Warren Bayou
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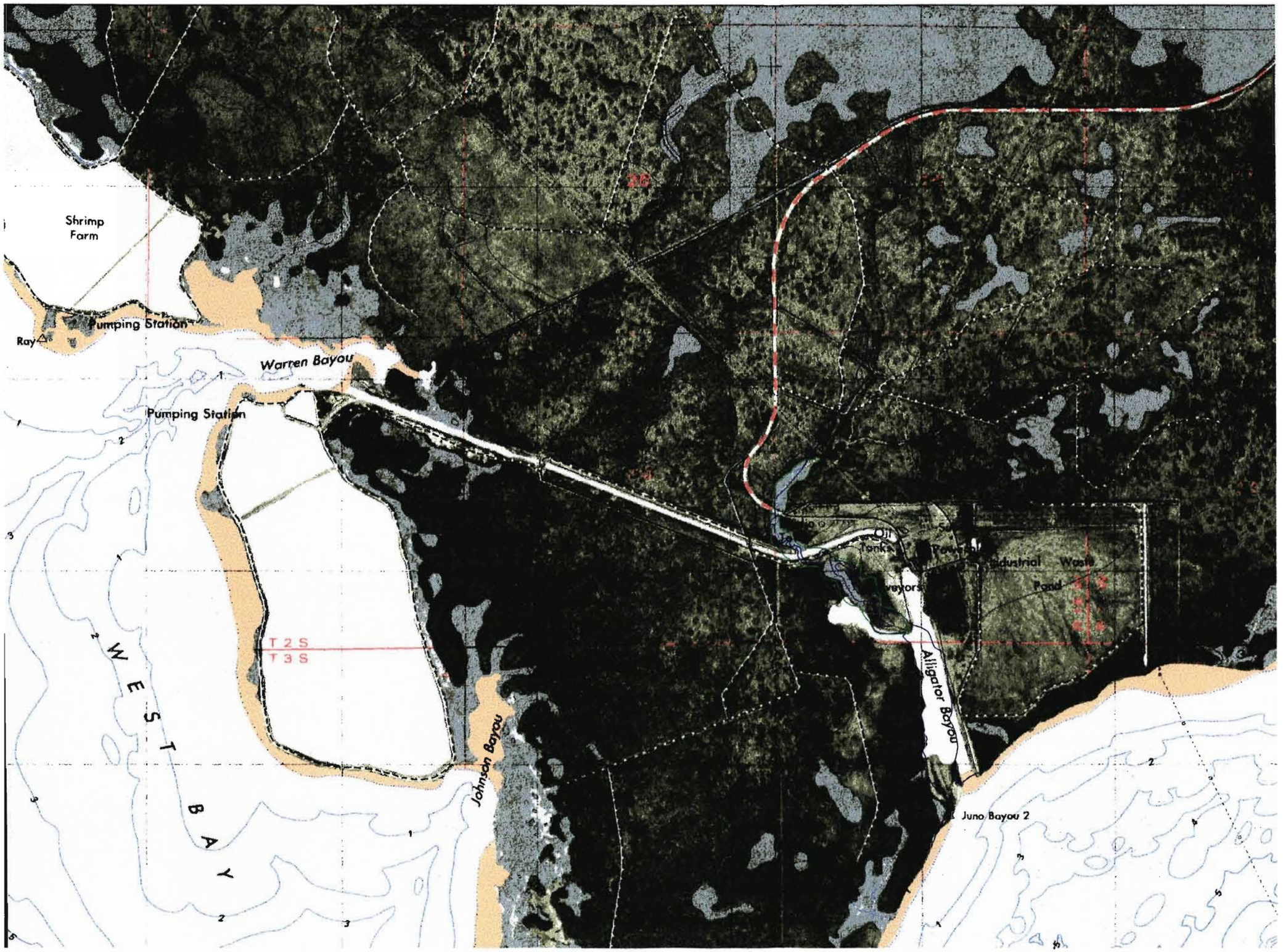
Industrial
Waste
Pond
Alligator Bayou
Juno Bayou 2


Shrimp Farm
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Ray
Warren Bayou
Pumping Station
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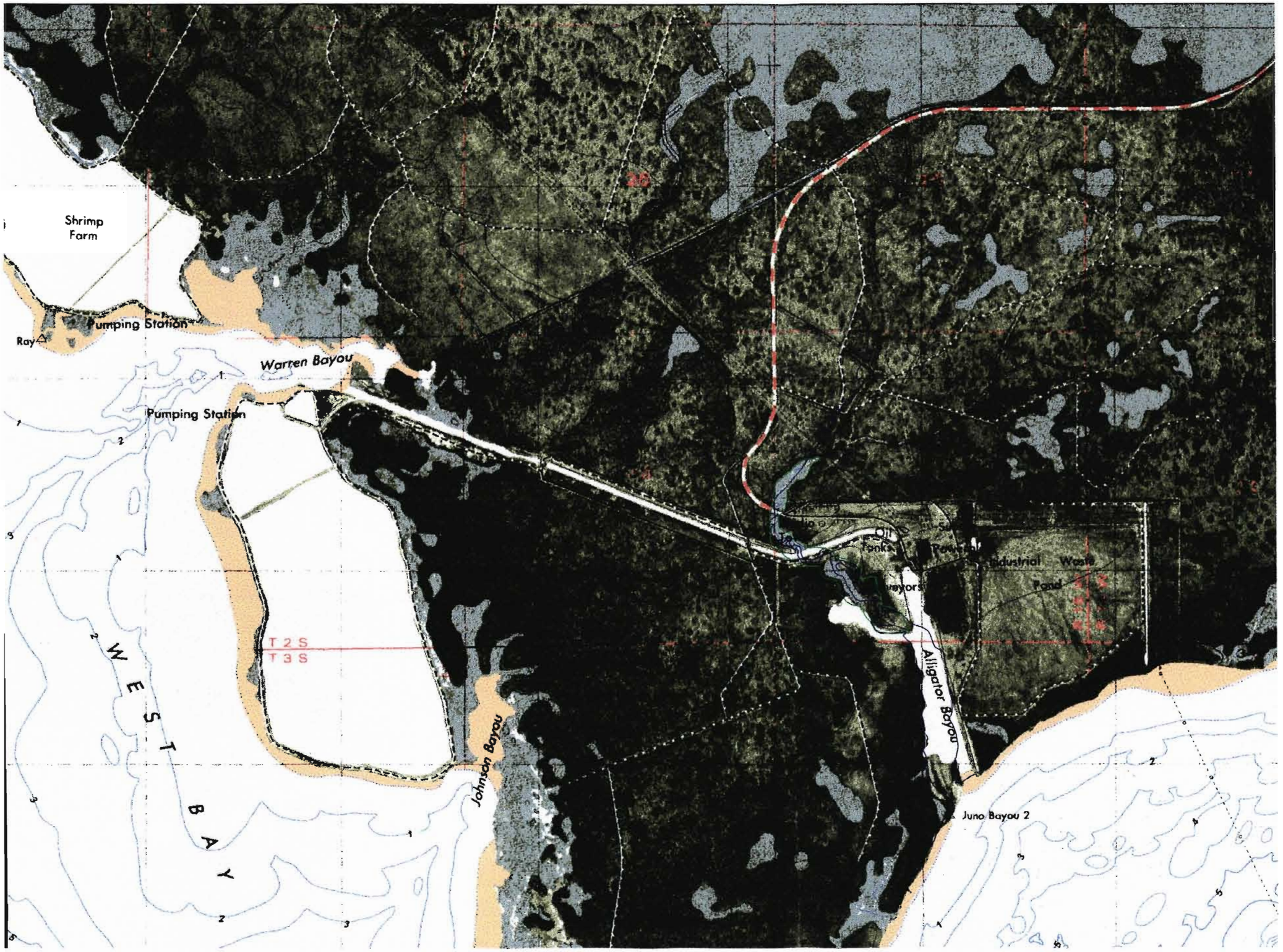
Johnson Bayou
Oil Tanks
Industrial Waste Pond
Alligator Bayou
Juno Bayou 2


Shrimp
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Warren Bayou
Pumping Station
T 2 S
T 3 S
WEST BAY
Johnson Bayou
Oil
Tanks
Industrial
Waste
Pond
Alligator Bayou
Juno Bayou 2

Florida Department of

Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

DATA TRANSMITTAL

DATE: AUGUST 25, 1998

TO: JONATHAN HOLTOM
DIVISION OF AIR
RESOURCES MANAGEMENT
MAIL STATION 5505
TALLAHASSEE, FLORIDA 32399

FROM: ROD MADDOX
Mail Station 105
Bureau of Survey and Mapping
Division of State Lands
Telephone (904) 488-2427
Telecopier (904) 413-9001

RE: **ALLIGATOR BAYOU**

DATA: PLEASE FIND ATTACHED 1"=500' SCALE MAP OF SUBJECT AREA.

/jl

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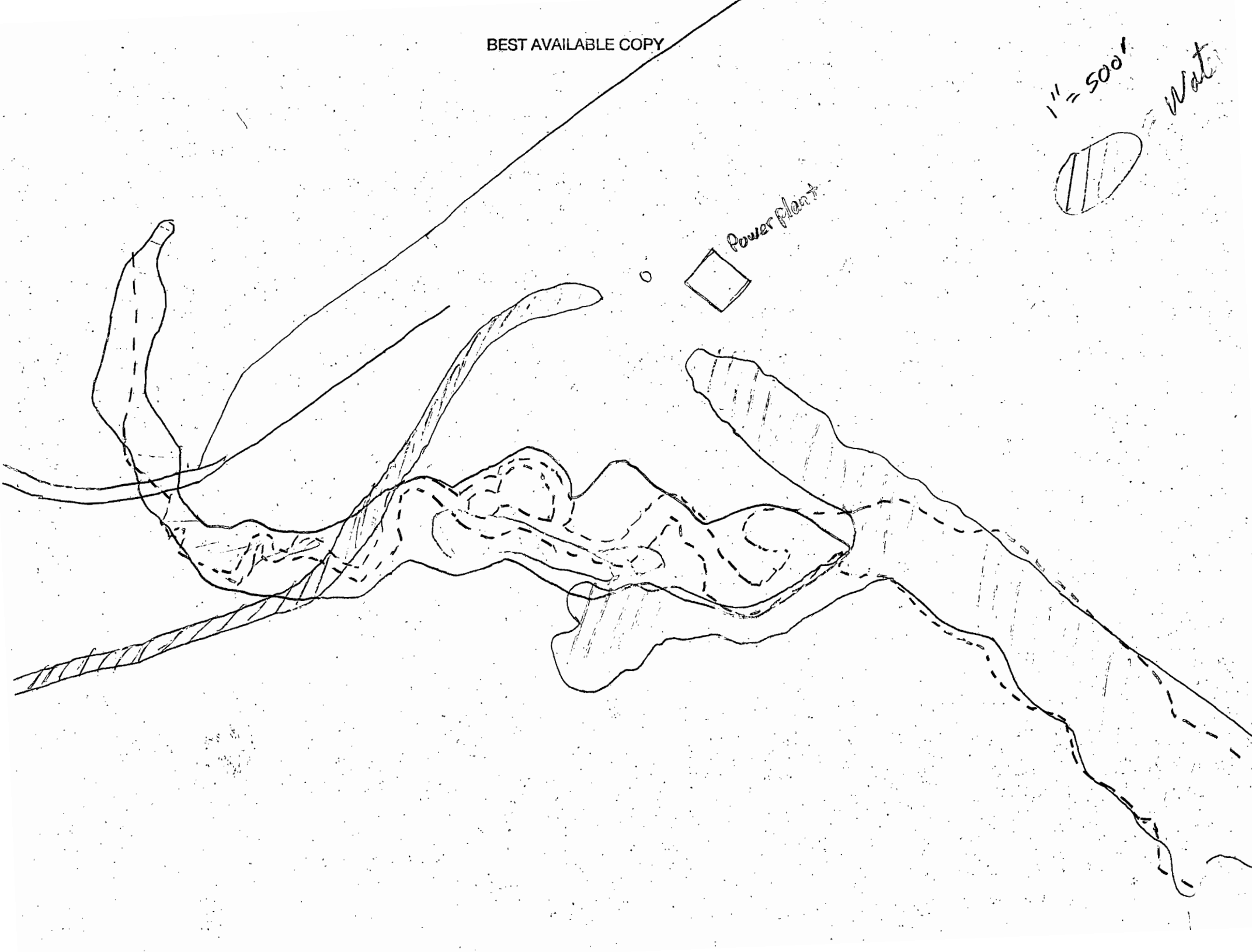

MEMORANDUM

August 17, 1998

TO: Jonathan Holton
Division of Air Resources Management

FROM: Rod Maddox, PLSSII
Bureau of Survey and Mapping

Subject: Alligator Bayou, Bay County

This is a follow-up to the memo from Terry Wilkinson to Clair Fancy dated May 11, 1998 regarding sovereignty interest in Alligator Bayou in Section 1, Township 3 South, Range 15 West, and Sections 35 and 36, Township 2 South, Range 15 West. As mentioned in the above memo, lands lying below the mean high water line prior to alteration are considered sovereignty lands.

On August 5, 1998, we conducted a field inspection of the waterbody from the canal to County Road 2300. We have also reviewed current and historical mapping and aerial photographs.

Based on this information we have compiled the attached an aerial photographic overlay. The blue and green lines, which were digitized from historical aerial photographs, delineate the extent of open water and marsh (respectively) prior to alteration.

It is recommended that the most landward extent indicated by the blue and green lines represent sovereignty lands for permit review purposes. Additional information is required for an accurate determination of the mean high water line prior to alteration in the dredged and filled areas, as well as the current mean high water line in the remaining marsh areas.

Please let me know if you have any questions at 488-2427.

/rm
attachments
cc: Terry Wilkinson
Scott Woolam
Melanie Knapp

(7)

(a) In order to assist it in making the determination required by paragraph (2)(a), the board shall require that a biological survey and an ecological study of the lands or interests therein proposed to be sold or conveyed pursuant to any particular application be made, and, when determined by the Department of Environmental Protection to be necessary, that a hydrographic survey be made. All such surveys and studies shall be made by or under the direction of the Department of Environmental Protection, which shall make a report of all such surveys and studies to the board together with its recommendations. The board may adopt regulations requiring that the cost of making any such survey and report be paid by the applicant for purchase of such lands, requiring a deposit by the applicant sufficient to ensure such payment, and providing procedures to be followed in applying for and obtaining such survey and report.

(b) If, in accordance with the provisions of paragraph (2)(b), the surveys and study required by paragraph (a) have already been made, the provisions of this section shall not operate to require an applicant to pay for any additional surveys or studies within 3 years prior to the issuance of such permit.

(8) All conveyances of sovereignty lands or fill material therein heretofore made by the Board of Trustees of the Internal Improvement Trust Fund of Florida subsequent to the enactment of chapter 6451, Acts of 1913, chapter 7304, Acts of 1917, and chapter 57-362, as amended, are hereby ratified, confirmed, and validated in all respects.

[1](9) All of the state's right, title, and interest to all tidally influenced land or tidally influenced islands bordering or being on sovereignty land, which have been permanently extended, filled, added to existing lands, or created before July 1, 1975, by fill, and might be owned by the state, is hereby granted to the landowner having record or other title to all or a portion thereof or to the lands immediately upland thereof and its successors in interest. Thereafter, such lands shall be considered private property, and the state, its political subdivisions, agencies, and all persons claiming by, through, or under any of them, shall be barred from asserting that any such lands are publicly owned sovereignty lands. The foregoing provisions shall act to transfer title only to so much of such extended or added land as was permanently exposed, extended, or added to before July 1, 1975. A showing of dates by which certain lands were filled or added to may be made by aerial photograph or other reasonable method. Upon request of the landowner and submission of a proposed legal description and aerial photographs or other evidence accompanied by a fee set by the board reflecting the actual administrative cost of processing, the board shall provide an appropriate legal description of the waterward boundary line as of July 1, 1975, in a recordable document. The Legislature specifically finds and declares these grants to be in the public interest. The boundary between state-owned sovereignty lands and privately owned uplands is ambulatory and will move as a result of nonavulsive changes. This subsection shall not grant or vest title to any filled, formerly submerged state-owned lands in any person who, as of January 1, 1993, is the record titleholder of the filled or adjacent upland property and who filled or caused to be filled the state-owned lands.

[1](10) Subsection (9) shall not operate to affect the title to lands which have been judicially adjudicated or which were the subject of litigation pending on January 1, 1993, involving title to such lands. Further, the provisions of subsection (9) shall not apply to spoil islands nor to any lands which are included on an official acquisition list, on July 1, 1993, of a state agency or water management district for conservation, preservation, or recreation, nor to lands maintained as state or local recreation areas or shore protection structures.

History.--s. 1, ch. 7304, 1917; RGS 1061; CGL 1391; ss. 1, 2, ch. 26776, 1951; s. 1, ch. 57-362; s. 2, ch. 61-119; s. 1, ch. 67-393; ss. 25, 27, 35, ch. 69-106; s. 1, ch. 69-308; s. 1, ch. 70-81; s. 1, ch. 70-97; s. 1, ch. 70-147; s. 1, ch. 70-439; s. 1, ch. 72-214; s. 23, ch. 78-95; s. 4, ch. 82-144; s. 122, ch. 83-217; s. 2, ch. 91-221; s. 81, ch. 93-206; ss. 72, 492, ch. 94-356.

[1]**Note.**--Section 82, ch. 93-206, provides that "[t]he conveyance of property under this act is intended to be complete and effective without reference to or compliance with other statutory provisions. The various statutory provisions dealing with or setting preconditions or procedures for the conveyance of state-owned property and sovereignty lands shall not apply to conveyance made pursuant to this section."

253.12 Title to tidal lands vested in state.--

(1) Except submerged lands heretofore conveyed by deed or statute, the title to all sovereignty tidal and submerged bottom lands, including all islands, sandbars, shallow banks, and small islands made by the process of dredging any channel by the United States Government and similar or other islands, sandbars, and shallow banks located in the navigable waters, and including all coastal and intracoastal waters of the state and all submerged lands owned by the state by right of its sovereignty in navigable freshwater lakes, rivers, and streams, is vested in the Board of Trustees of the Internal Improvement Trust Fund. For purposes of fixing bulkhead lines, restrictions on filling land and dredging beyond bulkhead lines, and permits required for filling and dredging, the board shall exercise the same authority over submerged lands owned by the state by right of its sovereignty in navigable freshwater lakes, rivers, and streams as it does over submerged lands otherwise defined in this subsection.

(2)

(a) The Board of Trustees of the Internal Improvement Trust Fund may sell and convey such islands and submerged lands if determined by the board to be in the public interest, upon such prices, terms, and conditions as it sees fit. However, prior to consummating any such sale, the board shall determine to what extent the sale of such islands or submerged lands and their ownership by private persons or the conveyance of such islands or submerged lands to political subdivisions or public agencies would interfere with the conservation of fish, marine and other wildlife, or other natural resources, including beaches and shores, and would result in destruction of oyster beds, clam beds, or marine productivity, including, but not limited to, destruction of marine habitats, grass flats suitable as nursery or feeding grounds for marine life, and established marine soils suitable for producing plant growth of a type useful as nursery or feeding grounds for marine life, and if so, in what respect and to what extent, and it shall consider any other factors affecting the public interests.

(b) In addition to the requirements in paragraph (a), the board shall not sell or convey any interest in such islands and submerged lands to any applicant who does not, at the time of making application for purchase or conveyance, also have before the board:

1. An application for the establishment of a bulkhead line, in the event no bulkhead line is established for the lands subject to the application; and

2. An application for approval of a fill permit issued in accordance with the provisions of this chapter; and

3. A permit or application for a permit to dredge fill material from beneath the navigable waters of the state, in accordance with the provisions of this chapter, in the event the applicant intends to secure such fill material. However, such islands or submerged lands may be sold or conveyed to an applicant who does not have such an application for a permit to dredge or fill lands before the board, upon the condition that the sale or conveyance to such an applicant shall contain a restrictive covenant prohibiting dredging, except for navigation purposes, or filling of such islands or submerged lands. The board shall reserve the authority to waive such restrictive covenant when such waiver is in the public interest, pursuant to such terms and conditions as the board may impose.

(3) After receiving application in compliance with such forms as may be required to show clearly what is intended to be accomplished in any proposed development of said lands and the manner in which said development will be accomplished, and after making the determination required by paragraph (2)(a), the board shall give notice as provided by s. 253.115.

(4) If objections are filed, the board shall proceed to determine the merits of the objections. The report required by subsection (7) shall be made part of the record and duly considered at any hearing. If it appears that the sale of such islands and submerged lands and their ownership by private persons or the conveyance of such islands or submerged lands to political subdivisions or public agencies would:

(a) Be contrary to the public interest;

(b) Interfere with the lawful rights granted riparian owners;

(c) Be, or result in, a serious impediment to navigation;

(d) Interfere with the conservation of fish, marine and other wildlife, or other natural resources, including beaches and shores, to such an extent as to be contrary to the public interest; or

(e) Result in the destruction of oyster beds, clam beds, or marine productivity, including, but not limited to, destruction of natural marine habitats, grass flats suitable as nursery or feeding grounds for marine life, and established marine soils suitable for producing plant growth of a type useful as nursery or feeding grounds for marine life to such an extent as to be contrary to the public interest,

the board shall withdraw the lands from sale. Prior to making the determinations above required, the board may consider any other factors affecting the public interest. Anything in this section to the contrary notwithstanding, lands defined herein lying between the ordinary mean high-water line and any bulkhead line established hereunder shall be sold only to the upland riparian owner and to no other person, firm, or corporation; and such sale to the upland riparian owner shall be made pursuant to the provisions herein.

(5)

(a) When any state agency or county, city, or other political subdivision extends or adds to existing lands or islands bordering on or being in the navigable waters, as defined in this section, of the state by filling in or causing to be filled in or by draining or causing to be drained such waters, the board may, upon application therefor, convey to the riparian owner or owners of the upland so extended or added to so much of such extended or added land as is not required exclusively for a municipal, county, state, or other public purpose. The board may, however, require a deposit to accompany such application of a sum sufficient to cover the actual cost and expenses of processing such application and preparing instruments of conveyance.

(b) Neither this subsection nor any other provision of this chapter shall be construed to permit any state agency or county, city, or other political subdivision to construct islands or extend or add to existing lands or islands bordering on or being in the navigable waters as defined herein or drain such waters for a municipal, county, state, or other public purpose unless such agency is the riparian upland owner or holds the consent in writing of the riparian upland owner consenting to such construction or extension or drainage operation. For the purposes of this subsection, "riparian upland owners" shall be defined as those persons owning upland property abutting those portions of the waters to be filled or drained, which are within 1,000 feet outboard of said riparian upland, but not more than one-half the distance to the opposite upland, if any, and within the extensions of the side boundary lines thereof, when said side boundary lines are extended in the direction of the channel along an alignment which would be required to distribute equitably the submerged land between the upland and the channel. However, nothing herein shall be construed to deny or limit any state agency or county, city, or other political subdivision from exercising the right of eminent domain to the extent and for the purposes authorized by law in connection with such construction, extension, or drainage projects; and nothing herein shall be construed to have application in those instances when the board is authorized by law to establish an erosion control line to implement an authorized beach nourishment, replenishment, or erosion-control project, or for the placement of sand dredged from navigation channels on beaches fronting the waters of the Atlantic Ocean or the Gulf of Mexico, provided such sand is not placed landward of existing lines of vegetation.

(6) Where any person, state agency, county, city, or other political subdivision prior to June 11, 1957, extended or added to existing lands or islands bordering on or being in the navigable waters as defined in this section by filling in or causing to be filled in such lands, the board shall upon application therefor convey said land so filled to the riparian owner or owners of the upland so extended or added to. The consideration for such conveyance shall be the appraised value of said lands as they existed prior to such filling.

Southern Companies NO_X Phase II Averaging Plan

Plant Name	ID #	Phase	Type	Em. Limit	Alt. Cont. Lim.	Annual Heat Inp.	R_{Li} X HI_i	R_{li} X HI_i
Barry	1	II	T	0.40	0.492	10,805,761	5,316,434.41	4,322,304.40
Barry	2	II	T	0.40	0.492	10,643,159	5,236,434.23	4,257,263.60
Barry	3	II	T	0.40	0.492	17,148,763	8,437,191.40	6,859,505.20
Barry	4	II	T	0.40	0.374	25,471,720	9,526,423.28	10,188,688.00
Barry	5	II	T	0.40	0.448	50,897,853	22,802,238.14	20,359,141.20
Bowen	1	I	T	0.45	0.421	45,395,755	19,111,612.86	20,428,089.75
Bowen	2	I	T	0.45	0.434	46,911,826	20,359,732.48	21,110,321.70
Bowen	3	I	T	0.45	0.430	59,796,338	25,712,425.34	26,908,352.10
Bowen	4	I	T	0.45	0.430	62,106,898	26,705,966.14	27,948,104.10
Branch	1	--	CB	0.68	0.988	14,906,580	14,727,701.04	10,136,474.40
Branch	2	I	T	0.50	0.717	16,571,123	11,881,495.19	8,285,561.50
Branch	3	--	CB	0.68	0.842	27,015,768	22,747,276.66	18,370,722.24
Branch	4	--	CB	0.68	0.842	28,967,878	24,390,953.28	19,698,157.04
Crist	4	I	T	0.45	0.520	3,062,929	1,592,723.08	1,378,318.05
Crist	5	I	T	0.45	0.599	4,850,348	2,905,358.45	2,182,656.60
Crist	6	I	DBW	0.50	0.455	17,603,755	8,009,708.53	8,801,877.50
Crist	7	I	DBW	0.50	0.448	32,267,381	14,455,786.69	16,133,690.50
Daniel	1	I	T	0.45	0.281	28,010,957	7,871,078.92	12,604,930.65
Daniel	2	I	T	0.45	0.265	29,025,313	7,691,707.95	13,061,390.85
Gadsden	1	I	T	0.45	0.648	2,473,380	1,602,750.24	1,113,021.00
Gadsden	2	I	T	0.45	0.648	2,333,659	1,512,211.03	1,050,146.55
Gaston	1	I	DBW	0.50	0.433	15,666,430	6,783,564.19	7,833,215.00
Gaston	2	I	DBW	0.50	0.433	15,642,121	6,773,038.39	7,821,060.50
Gaston	3	I	DBW	0.50	0.427	16,016,613	6,839,093.75	8,008,306.50
Gaston	4	I	DBW	0.50	0.427	15,780,983	6,738,479.74	7,890,491.50
Gaston	5	I	T	0.45	0.422	43,137,116	18,203,862.95	19,411,702.20
Gorgas	6	II	DBW	0.46	0.864	5,058,595	4,370,626.08	2,326,953.70
Gorgas	7	II	DBW	0.46	0.864	5,052,447	4,365,314.21	2,324,125.62
Gorgas	8	II	T	0.40	0.486	11,173,785	5,430,459.51	4,469,514.00
Gorgas	9	II	T	0.40	0.303	10,939,664	3,314,718.19	4,375,865.60
Gorgas	10	II	T	0.40	0.763	46,251,622	35,289,987.59	18,500,648.80
Green Co	1	--	CB	0.68	0.977	19,524,675	19,075,607.48	13,276,779.00
Green Co	2	II	DBW	0.46	0.434	18,839,670	8,176,416.78	8,666,248.20
Hammond	1	I	DBW	0.50	0.827	4,539,663	3,754,301.30	2,269,831.50
Hammond	2	I	DBW	0.50	0.827	6,333,156	5,237,520.01	3,166,578.00
Hammond	3	I	DBW	0.50	0.827	6,439,818	5,325,729.49	3,219,909.00
Hammond	4	I	DBW	0.50	0.454	26,126,591	11,861,472.31	13,063,295.50
Kraft	1	I	T	0.45	0.580	2,974,849	1,725,412.42	1,338,682.05
Kraft	2	I	T	0.45	0.580	2,238,703	1,298,447.74	1,007,416.35
Kraft	3	I	T	0.45	0.580	3,971,009	2,303,185.22	1,786,954.05
L. Smith	1	II	T	0.40	0.618	9,199,644	5,685,379.99	3,679,857.60
L. Smith	2	II	T	0.40	0.436	10,154,723	4,427,459.23	4,061,889.20
McDonough	1	I	T	0.45	0.420	18,934,013	7,952,285.46	8,520,305.85
McDonough	2	I	T	0.45	0.420	17,338,565	7,282,197.30	7,802,354.25
McIntosh	1	I	DBW	0.50	0.858	8,568,975	7,352,180.55	4,284,487.50

Southern Companies NO_X Phase II Averaging Plan

Plant Name	ID #	Phase	Type	Em. Limit	Alt. Cont. Lim.	Annual Heat Inp.	R_{Li} X HI_i	R_{li} X HI_i
Miller	1	II	DBW	0.46	0.293	53,814,591	15,767,675.16	24,754,711.86
Miller	2	II	DBW	0.46	0.293	52,772,559	15,462,359.79	24,275,377.14
Miller	3	II	DBW	0.46	0.293	49,093,163	14,384,296.76	22,582,854.98
Miller	4	II	DBW	0.46	0.293	55,722,252	16,326,619.84	25,632,235.92
Mitchell	3	I	T	0.45	0.615	5,322,072	3,273,074.28	2,394,932.40
Scherer	1	II	T	0.40	0.500	52,573,864	26,286,932.00	21,029,545.60
Scherer	2	II	T	0.40	0.500	55,563,600	27,781,800.00	22,225,440.00
Scherer	3	II	T	0.45	0.295	37,912,770	11,184,267.15	17,060,746.50
Scherer	4	II	T	0.40	0.300	70,093,731	21,028,119.30	28,037,492.40
Scholz	1	I	DBW	0.50	0.682	1,855,434	1,265,405.99	927,717.00
Scholz	2	I	DBW	0.50	0.774	1,864,795	1,443,351.33	932,397.50
Wansley	1	I	T	0.45	0.413	53,141,279	21,947,348.23	23,913,575.55
Wansley	2	I	T	0.45	0.421	49,741,786	20,941,291.91	22,383,803.70
Watson	4	I	DBW	0.50	0.500	17,100,575	8,550,287.50	8,550,287.50
Watson	5	I	DBW	0.50	0.647	33,455,317	21,645,590.10	16,727,658.50
Yates	1	I	T	0.45	0.481	3,853,527	1,853,546.49	1,734,087.15
Yates	2	I	T	0.45	0.481	4,687,321	2,254,601.40	2,109,294.45
Yates	3	I	T	0.45	0.481	3,981,916	1,915,301.60	1,791,862.20
Yates	4	I	T	0.45	0.396	7,087,706	2,806,731.58	3,189,467.70
Yates	5	I	T	0.45	0.396	5,186,897	2,054,011.21	2,334,103.65
Yates	6	I	T	0.45	0.328	13,373,298	4,386,441.74	6,017,984.10
Yates	7	I	T	0.45	0.303	14,601,869	4,424,366.31	6,570,841.05

SUM (HI_i):	1,518,970,896.00
SUM (R_{Li} X HI_i):	699,147,368.85
SUM (R_{li} X HI_i):	699,481,605.25

SUM (R_{Li} X HI_i) / SUM (HI_i):	0.4603	<	SUM (Rli X HIi) / SUM (HIi): 0.4605

The averaging plan, as submitted, appears to meet the requirements. Therefore, it is approvable.

Prepared by: Jonathan Holtom, State of Florida.
Phone: (850) 921-9531; or, E-Mail: "Holtom_j@dep.state.fl.us"

Phase II NOx Averaging Plan Checklist (40 CFR 76.11)

Source (Plant) Name:	Date Compliance Plan Received:
Gulf Power	2) 7/28/98

Completeness Review

Reviewer:	☐ Complete ☒ Incomplete *	Date:
J. Holtom		7/31/98

Substantive Review

Reviewer:	Recommended for Approval? ☒ Yes ☐ No	Date:
J. Holtom		7/31/98

Completeness Review

Checklist Items:

All pertinent spaces are filled in, information is legible, appropriate, (e.g. ORIS code is entered in "ORIS Code" box) and compliance plan is signed and dated.

☒ Yes ☐ No

Notes/Comments/Issues:

Submitted by James Vick for Gulf Power.

D.R. for Avg. Plan is Charles McCrary.

Plan Looks ok, but pursuant to 62-214.330(3)(b), Florida can not deem complete or approve the multi-State plan until the D.R submits a certification that all other involved permitting authorities have approved the plan.

Phase II NOx Averaging Plan Checklist (40 CFR 76.11)

Source (Plant) Name: Gulf Power	Date Compliance Plan Received:

Substantive Review

Checklist Items:		**Notes/Comments/Issues:**
STEP 1:		
(i) The plant name and State identified in the Phase II NOx Compliance Plan for the affected source are also identified in the Phase II NOx averaging plan.	☒ Yes ☐ No	
(ii) The boilers ID #'s for which row "j" has been checked in the Phase II NOx Compliance Plan for the affected source match the boiler ID #'s identified for the affected source in the averaging plan.	☒ Yes ☐ No	
(iii) The standard emission limitation entered at column "a" for each boiler at the affected source matches the standard emission limitation for that type of boiler in 40 CFR 76.5, 76.6, or 76.7 (early election units must enter the applicable emission limitation from 40 CFR 76.7) and with the standard limitation denoted for the boiler in Section 4 of the Acid Rain Permit Writer's Guide (including those units that are early election units or units that have, or are applying for, an alternative emission limitation).	☒ Yes ☐ No	

Phase II NOx Averaging Plan Checklist (40 CFR 76.11)

Source (Plant) Name: Gulf Power	Date Compliance Plan Received:

Checklist Items:		Notes/Comments/Issues:
STEP 1, cont'd.		
(iv) An alternative contemporaneous emissions limitation (ACEL) has been entered for each boiler in column "b," and that limitation has been rounded to the nearest hundredth (for example, 0.48 lb/mmBtu). For units that have also marked line "1" of the Phase II NOx Compliance plan, the same ACEL has been entered in column "b" of the averaging plan for each unit utilizing the same common stack.	☒ Yes ☐ No	
(v) A heat input limit has been entered for every unit listed at STEP 1.	☒ Yes ☐ No	

STEP 2:

Confirm that the numbers entered in the left and right boxes at STEP 2 have been calculated properly.

For the **left box**, calculate what the group NOx emission rate for the units would be if operated in accordance with the ACELs entered at column "b" by:

(1) For each unit, multiplying the emission limitation in column "b" times the annual heat input in column "c," and adding the resulting numbers.

(2) Adding all of the annual heat input figures in column "c."

(3) Divide the answer from number (1) above by the answer from number (2) above. The result should equal the figure entered in the **left box** at STEP 2.

Phase II NOx Averaging Plan Checklist (40 CFR 76.11)

Source (Plant) Name: Gulf Power	Date Compliance Plan Received:

STEP 2, cont'd.

Checklist Items:		**Notes/Comments/Issues:**
(i) Does the reviewer's calculation of the number in the **left box** at STEP 2 equal the number calculated and entered in the **left box** by the Designated Representative?	☒ Yes ☐ No	

For the **right box**, calculate what the group NOx emission rate for the units would be if operated in accordance with the emission limitations entered at column "a" by:

(1) For each unit, multiplying the emission limitation in column "a" times the annual heat input in column "c," and adding the resulting numbers.

(2) Adding all of the annual heat input figures in column "c."

(3) Divide the answer from number (1) above by the answer from number (2) above. The result should equal the figure entered in the **right box** at STEP 2.

(ii) Does the reviewer's calculation of the number in the **right box** at STEP 2 equal the number calculated and entered in the **right box** at STEP 2 by the Designated Representative?	☒ Yes ☐ No	
(iii) The number in the left box must be less than or equal to the number in the right box. Is the number in the **left box** at STEP 2 **less than or equal to** the number in the **right box** at STEP 2?	☒ Yes ☐ No	They are equal.

Phase II NOx Averaging Plan Checklist (40 CFR 76.11)

Source (Plant) Name: Gulf Power	Date Compliance Plan Received:

Checklist Items:		Notes/Comments/Issues:
STEP 3:		
If one averaging plan is to be effective for more than one calendar year, a plan duration of not greater than 5 calendars years has been entered. If the averaging plan is to be treated as a number of identical plans effective for one year each, the number of identical plans entered matches the number of years entered for which the plans will be in effect.	☒ Yes ☐ No	T5/Acid rain permit ~~should~~ became final 1/1/2000 Ph II NOx starts 1/1/2000 Plan was submitted for 2000 – 2004, T5 Permit will expire 12/31/2004
STEP 4:		
The designated representative (DR) or alternate designated representative (ADR) entered at this Step has been verified as the certified DR or ADR as of the date the Phase II NOx averaging plan was signed.	☒ Yes ☐ No	

Note: The valid DR for a submission can be identified by reviewing the state copy of the appropriate DR form for an affected source, through DR information available on the World Wide Web, or by contacting either the EPA Regional acid rain contact or Acid Rain Division at EPA Headquarters.

One Energy Place
Pensacola, Florida 32520

850.444.6111

GULF POWER
A SOUTHERN COMPANY

July 27, 1998

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Dear Mr. Sheplak:

RE: Plant Crist Title IV Phase II NOx Compliance Plan
ORIS Code: 641
FDEP Draft Permit No: 0330045-001-AV

Attached, please find Gulf Power's revised Phase II NOx Compliance Plan and associated NOx Averaging Plan for the Crist Electric Generating Plant (ORIS Code 641). Please note that the new original signed copy of the averaging plan is attached to this correspondence and copies are attached to other Gulf Power submissions, i.e. (Scholz and Lansing Smith). ***This revised submission changes the System NOx Averaging Plan to two decimal points instead of four as originally submitted on December 18, 1997.***

The NOx compliance plan for this unit utilizes a NOx averaging plan that includes other affected units in the Southern Company. Title V permitting authorities with jurisdiction over the units in the plan include the States of Alabama, Georgia and Mississippi, as well as the Jefferson County Department of Health in Alabama. Our sister operating companies within the Southern Company are providing their respective state environmental regulatory agencies a copy of this NOx averaging plan with their Phase II NOx permit compliance plans, thereby fulfilling the requirement of the General Instructions (Item 4a) to provide a copy of the plan to other Title V permitting authorities with jurisdiction over any units in the plan.

If you have any questions or need further information regarding the Crist Title IV Phase II Compliance and Averaging Plan, please call me at (850) 444.6527.

Sincerely,

G. Dwain Waters, Q.E.P.

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

cc: Robert G. Moore, Gulf Power Company
James O Vick, Gulf Power Company
J. W. Martin, Gulf Power Company
John Dominey, Gulf Power Company
Danny Herrin, Southern Company Services
Brian L. Beals EPA Region IV

Florida Department of Environmental Protection

Phase II NO_X Compliance Plan

For more information, see instructions and refer to 40 CFR 76.9

This submission is: [X] New [ ] Revised Page [ ] of [ ]

STEP 1 Indicate plant name, state, and ORIS code from NADB, if applicable.	CRIST ELECTRIC GENERATING PLANT Plant Name	FL State	641 ORIS Code
STEP 2	Identify each affected Group 1 and Group 2 boiler using the boiler ID# from NADB, if applicable. Indicate boiler type: "CB" for cell burner, "CY" for cyclone, "DBW" for dry bottom wall-fired, "T" for tangentially fired, "V" for vertically fired, and "WB" for wet bottom. Indicate the compliance option selected for each unit.		

	ID# 4	ID# 5	ID# 6	ID# 7	ID#	ID#
	Type T	Type T	Type DBW	Type DBW	Type	Type
(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for Phase I dry bottom wall-fired boilers)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired boilers)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(c) EPA-approved early election plan under 40 CFR 76.8 through 12/31/07 (also indicate above emission limit specified in plan)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(d) Standard annual average emission limitation of 0.46 lb/mmBtu (for Phase II dry bottom wall-fired boilers)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(e) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(f) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(g) Standard annual average emission limitation of 0.86 lb/mmBtu (for cyclone boilers)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(h) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(i) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(j) NO_x Averaging Plan (include NO_x Averaging form)	[X]	[X]	[X]	[X]	[ ]	[ ]
(k) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(A) (check the standard emission limitation box above for most stringent limitation applicable to any unit utilizing stack)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]

CRIST ELECTRIC GENERATING PLANT Plant Name (from Step 1)	Page ☐ of ☐

STEP 2, cont'd.

	ID# / Type	ID# / Type	ID# / Type	ID# / Type	ID# / Type	ID# / Type
(l) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(B) with NO_x Averaging (check the NO_x Averaging Plan box and include NO_x Averaging Form)	☐	☐	☐	☐	☐	☐
(m) EPA-approved common stack apportionment method pursuant to 40 CFR 75.17 (a)(2)(i)(C), (a)(2)(iii)(B), or (b)(2)	☐	☐	☐	☐	☐	☐
(n) AEL (include Phase II AEL Demonstration Period, Final AEL Petition, or AEL Renewal form as appropriate)	☐	☐	☐	☐	☐	☐
(o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing	☐	☐	☐	☐	☐	☐
(p) Repowering extension plan approved or under review	☐	☐	☐	☐	☐	☐

STEP 3
Read the standard requirements and certification, enter the name of the designated representative, sign and date.

Standard Requirements

General. This source is subject to the standard requirements in 40 CFR 72.9 (consistent with 40 CFR 76.8(e)(1)(i)). These requirements are listed in this source's Acid Rain Part of its Title V permit.

Special Provisions for Early Election Units

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO_x as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii).

Liability. The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77.

Termination. An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7.

STEP 3, cont'd.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name James O. Vick	
Signature James O Vick	Date 7/27/98

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Expires 1-31-99

Phase II NO_x Averaging Plan

original

For more information, see instructions and refer to 40 CFR 76.11

Page 1

This submission is: ☐ New ☒ Revised

Page ☐ of ☐

STEP 1

Identify the units participating in this averaging plan by plant name, State, and boiler ID# from NADB. In column (a), fill in each unit's applicable emission limitation from 40 CFR 76.5, 76.6, or 76.7. In column (b), assign an alternative contemporaneous annual emissions limitation in lb/mmBtu to each unit. In column (c), assign an annual heat input limitation in mmBtu to each unit. Continue to page 3 if necessary.

Plant Name	State	ID#	(a) Emission Limitation	(b) Alt. Contemp. Emission Limitation	(c) Annual Heat Input Limit
See Page 3					

STEP 2

Use the formula to enter the Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan and the Btu-weighted annual average emission rate for the same units if they are operated in compliance with 40 CFR 76.5, 76.6, or 76.7. The former must be less than or equal to the latter.

Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan		Btu-weighted annual average emission rate for same units operated in compliance with 40 CFR 76.5, 76.6 or 76.7
0.46	≤	0.46

$$\frac{\sum_{i=1}^{n} (R_{Li} \times HI_i)}{\sum_{i=1}^{n} HI_i} \leq \frac{\sum_{i=1}^{n} [R_{1i} \times HI_i]}{\sum_{i=1}^{n} HI_i}$$

Where,

R_{Li} = Alternative contemporaneous annual emission limitation for unit i, in lb/mmBtu, as specified in column (b) of Step 1:

R_{1i} = Applicable emission limitation for unit i, in lb/mmBtu, as specified in column (a) of Step 1;

HI_i = Annual heat input for unit i, in mmBtu, as specified in column (c) of Step 1;

n = Number of units in the averaging plan

STEP 3

Mark one of the two options and enter dates.

☐ This plan is effective for calendar year _____ through calendar year _____ unless notification to terminate the plan is given.

☒ Treat this plan as ☒ identical plans, each effective for one calendar year for the following calendar years: 2000, 2001, 2002, 2003 and 2004 unless notification to terminate one or more of these plans is given.

STEP 4

Read the special provisions and certification, enter the name of the designated representative, and sign and date.

Special Provisions

Emission Limitations

Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitation for NO_x under the plan only if the following requirements are met:

(i) For each unit, the unit's actual annual average emission rate for the calendar year, in lb/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and
(a) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,
(b) For each unit with an alternative contemporaneous emission limitation more stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, or
(ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with 40 CFR 76.11(d)(1)(ii)(A) and (B), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7.
(iii) If there is a successful group showing of compliance under 40 CFR 76.11(d)(1)(ii)(A) and (B) for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under (i).

Liability

The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.

Termination

The designated representative may submit a notification to terminate an approved averaging plan, in accordance with 40 CFR 72.40(d), no later than October 1 of the calendar year for which the plan is to be terminated.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Charles D. McCrary	
Signature Charles D. McCrary	Date 7/20/98

Southern Company Averaging Plan Participating Plants

Plant Name (from Step 1) as Listed in Step 1.

STEP 1
Continue the identification of units from Step 1, page 1, here.

Plant Name	State	ID #	(a) Emission Limitation	(b) Alt. Contemp. Emission Limitation	(c) Annual Heat Input Limit
Hammond	GA	1	0.50	0.83	4,539,663
Hammond	GA	2	0.50	0.83	6,333,156
Hammond	GA	3	0.50	0.83	6,439,818
Hammond	GA	4	0.50	0.45	26,126,591
Kraft	GA	1	0.45	0.58	2,974,849
Kraft	GA	2	0.45	0.58	2,238,703
Kraft	GA	3	0.45	0.58	3,971,009
L. Smith	FL	1	0.40	0.62	9,199,644
L. Smith	FL	2	0.40	0.44	10,154,723
McDonough	GA	1	0.45	0.42	18,934,013
McDonough	GA	2	0.45	0.42	17,338,565
McIntosh	GA	1	0.50	0.86	8,568,975
Miller	AL	1	0.46	0.29	53,814,591
Miller	AL	2	0.46	0.29	52,772,559
Miller	AL	3	0.46	0.29	49,093,163
Miller	AL	4	0.46	0.29	55,722,252
Mitchell	GA	3	0.45	0.62	5,322,072
Scherer	GA	1	0.40	0.50	52,573,864
Scherer	GA	2	0.40	0.50	55,563,600
Scherer	GA	3	0.45	0.29	37,912,770
Scherer	GA	4	0.40	0.30	70,093,731
Scholz	FL	1	0.50	0.68	1,855,434
Scholz	FL	2	0.50	0.77	1,864,795
Wansley	GA	1	0.45	0.41	53,141,279
Wansley	GA	2	0.45	0.42	49,741,786
Watson	MS	4	0.50	0.50	17,100,575
Watson	MS	5	0.50	0.65	33,455,317
Yates	GA	1	0.45	0.48	3,853,527
Yates	GA	2	0.45	0.48	4,687,321
Yates	GA	3	0.45	0.48	3,981,916
Yates	GA	4	0.45	0.40	7,087,706
Yates	GA	5	0.45	0.40	5,186,897
Yates	GA	6	0.45	0.33	13,373,298
Yates	GA	7	0.45	0.30	14,601,869

Southern Company Averaging Plan Participating Plants

Plant Name (from Step 1) as Listed in Step 1.

STEP 1
Continue the identification of units from Step 1, page 1, here.

Plant Name	State	ID #	(a) Emission Limitation	(b) Alt. Contemp. Emission Limitation	(c) Annual Heat Input Limit
Barry	AL	1	0.40	0.49	10,805,761
Barry	AL	2	0.40	0.49	10,643,159
Barry	AL	3	0.40	0.49	17,148,763
Barry	AL	4	0.40	0.37	25,471,720
Barry	AL	5	0.40	0.45	50,897,853
Bowen	GA	1	0.45	0.42	45,395,755
Bowen	GA	2	0.45	0.43	46,911,826
Bowen	GA	3	0.45	0.43	59,796,338
Bowen	GA	4	0.45	0.43	62,106,898
Branch	GA	1	0.68	0.99	14,906,580
Branch	GA	2	0.50	0.72	16,571,123
Branch	GA	3	0.68	0.84	27,015,768
Branch	GA	4	0.68	0.84	28,967,878
Crist	FL	4	0.45	0.52	3,062,929
Crist	FL	5	0.45	0.60	4,850,348
Crist	FL	6	0.50	0.45	17,603,755
Crist	FL	7	0.50	0.45	32,267,381
Daniel	MS	1	0.45	0.28	28,010,957
Daniel	MS	2	0.45	0.26	29,025,313
Gadsden	AL	1	0.45	0.65	2,473,380
Gadsden	AL	2	0.45	0.68	2,333,659
Gaston	AL	1	0.50	0.43	15,666,430
Gaston	AL	2	0.50	0.43	15,642,121
Gaston	AL	3	0.50	0.43	16,016,613
Gaston	AL	4	0.50	0.43	15,780,983
Gaston	AL	5	0.45	0.42	43,137,116
Gorgas	AL	6	0.46	0.86	5,058,595
Gorgas	AL	7	0.46	0.86	5,052,447
Gorgas	AL	8	0.40	0.49	11,173,785
Gorgas	AL	9	0.40	0.30	10,939,664
Gorgas	AL	10	0.40	0.76	46,251,622
Greene Co	AL	1	0.68	0.98	19,524,675
Greene Co	AL	2	0.46	0.43	18,839,670

GULF POWER COMPANY

ONE ENERGY PLACE
PENSACOLA, FLORIDA 32520-0328

To: Jonathan Holton

Company: FDEP - Tall

Phone:

Fax: (850) 922-6979

From: Dwain Waters

Company: Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Phone: (850) 444-6527

Fax: 850.444.6217

Date: July 24

Pages including this cover page: 4

Comments: I thought you might enjoy looking over EPA's annual feedback report on Title V Cert / Compliance.

Please note that we have a new address and a new area code (see above). Appreciate you updating your address list concerning our company.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

JUL 9 1998

Mr. Charles D. McCrary
Designated Representative
Southern Company
600 North 18th Street
Birmingham, AL 35203

Dear Mr. McCrary:

Several weeks ago we sent your company a 1997 Compliance Assessment Report for your Phase I NO_x and Phase II early election units that identified Victor J Daniel unit 2 as being subject to the Phase I standard emissions limitation. According to Victor J Daniel's acid rain permit, unit 2 is in an averaging plan. We have corrected this error and have enclosed a new Compliance Assessment Report for your records. The revised report supersedes the 1997 Compliance Assessment Report we previously sent you.

The revised report indicates that all of your units are still in compliance with the Phase I NO_x and early election requirements for 1997. If you have any questions about the enclosed report, please call Donna Deneen at (202) 564-9089.

Sincerely,

Brian J. McLean, Director
Acid Rain Division

Enclosure

Revised July 8, 1998

1997 NOx Compliance Assessment Report

DR Name: MCCRARY, CHARLES D.
DR Affiliation: SOUTHERN COMPANY

COMPLIANCE SUMMARY

PHASE I UNITS AVERAGING EMISSIONS UNDER §76.11

Averaging Plan ID	Group NOx Limit	Group NOx Rate	In Compliance?	Excess Emissions (tons)
AP000007	0.48	0.44	Yes	

Plant Name and State	ORIS Code	Unit ID	NOx Limit	NOx Rate	Heat Input
GADSDEN AL	7	1	0.45	0.64	3257292
GADSDEN AL	7	2	0.45	0.68	3258590
E C GASTON AL	26	1	0.50	0.43	14950877
E C GASTON AL	26	2	0.50	0.43	16144807
E C GASTON AL	26	3	0.50	0.42	17580910
E C GASTON AL	26	4	0.50	0.42	16180310
E C GASTON AL	26	5	0.45	0.42	46377835
					117750621

Averaging Plan ID	Group NOx Limit	Group NOx Rate	In Compliance?	Excess Emissions (tons)
AP000703	0.46	0.44	Yes	

Plant Name and State	ORIS Code	Unit ID	NOx Limit	NOx Rate	Heat Input
ARKWRIGHT GA	699	1	0.45	0.77	595763
ARKWRIGHT GA	699	2	0.45	0.77	884921
ARKWRIGHT GA	699	3	0.45	0.77	919471
ARKWRIGHT GA	699	4	0.45	0.77	701746
BOWEN GA	703	1BLR	0.45	0.43	49977072
BOWEN GA	703	2BLR	0.45	0.44	45321466
BOWEN GA	703	3BLR	0.45	0.43	54811544
BOWEN GA	703	4BLR	0.45	0.42	57170903
HAMMOND GA	708	1	0.50	0.83	3940167
HAMMOND GA	708	2	0.50	0.83	3355444
HAMMOND GA	708	3	0.50	0.83	4809928
HAMMOND GA	708	4	0.50	0.46	23714698

(Cont.)

ACID RAIN PROGRAM

U. S. Environmental Protection Agency
Acid Rain Division
401 M Street, SW
Mail Code 6204J
Washington, DC 20460

Revised July 8, 1998

CHARLES D. MCCRARY
Page: 2

COMPLIANCE SUMMARY (Cont.)

AVERAGING PLAN: AP000703 (Cont.)

Plant Name and State	ORIS Code	Unit ID	NOx Limit	NOx Rate	Heat Input
HARLLEE BRANCH GA	709	2	0.50	0.72	13727470
JACK MCDONOUGH GA	710	MB1	0.45	0.42	17391180
JACK MCDONOUGH GA	710	MB2	0.45	0.42	18039199
MITCHELL GA	727	3	0.45	0.62	4404128
YATES GA	728	Y1BR	0.45	0.45	2562462
YATES GA	728	Y2BR	0.45	0.48	3568288
YATES GA	728	Y3BR	0.45	0.48	3782679
YATES GA	728	Y4BR	0.45	0.39	5505970
YATES GA	728	Y5BR	0.45	0.39	4525391
YATES GA	728	Y6BR	0.45	0.33	12553519
YATES GA	728	Y7BR	0.45	0.31	12915696
KRAFT GA	733	1	0.45	0.62	1485281
KRAFT GA	733	2	0.45	0.62	1775138
KRAFT GA	733	3	0.45	0.62	4273319
WANSLEY GA	6052	1	0.45	0.41	45956580
WANSLEY GA	6052	2	0.45	0.41	45215913
MCINTOSH GA	6124	1	0.50	0.86	7719743
SCHERER GA	6257	3	0.45	0.30	47388624
					498993703

Averaging Plan ID	Group NOx Limit	Group NOx Rate	In Compliance?	Excess Emissions (tons)
AP002049	0.48	0.42	Yes	

Plant Name and State	ORIS Code	Unit ID	NOx Limit	NOx Rate	Heat Input
CRIST FL	641	4	0.45	0.52	3014961
CRIST FL	641	5	0.45	0.59	5324877
CRIST FL	641	6	0.50	0.45	12828682
CRIST FL	641	7	0.50	0.44	23238171
SCHOLZ FL	642	1	0.50	0.67	840579
SCHOLZ FL	642	2	0.50	0.77	1337456
JACK WATSON MS	2049	4	0.50	0.49	13197197
JACK WATSON MS	2049	5	0.50	0.64	33634910
VICTOR J DANIEL JR MS	6073	1	0.45	0.28	33717920
VICTOR J DANIEL JR MS	6073	2	0.45	0.26	35075722
					162210475

PHASE II UNITS SUBJECT TO EARLY ELECTION UNDER §76.8

Plant Name and State	ORIS Code	Unit ID	NOx Limit	NOx Rate	In Compliance?
SCHERER GA	6257	4	0.45	0.32	Yes

Memorandum

Florida Department of
Environmental Protection

(1) DR Certifies that other States have approved

→ Straight process -

~~Draft~~

(2) Otherwise:
Compliance plan or
Compliance plan
(A) Don't have all certs
(B) DR must provide Certs by ______
(C) ~~[illegible]~~ After certs received - Can use

~~If don't get~~

(D) Cannot use w/ first providing Certs

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

Gulf Power Company
One Energy Place
Pensacola, FL 32520

_____/

OGC No. 97-1824

DRAFT Permit No. 0330045-001-AV
Crist Plant
Escambia County

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 28-106.111(3) and 62-103.050(1), an extension of time, to and including October 1, 1998, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, Gulf states the following:

1. On or about October 6, 1997, Gulf received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0330045-001-AV) for the Crist Plant located in Escambia County, Florida. Along with the Intent to Issue, Gulf received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."

2. By order dated April 15, 1998, the Department granted an extension of time until July 1, 1998, within which to file a petition for an administrative hearing.

3. The draft permit and associated documents contain several provisions that warrant clarification or correction.

4. Representatives of Gulf have corresponded and intend to continue to correspond with staff of the Department's Bureau of Air Regulation in an effort to resolve all issues.

5. This request is filed simply as a protective measure to avoid waiver of Gulf's right to challenge certain conditions contained in the draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing.

6. Jonathan Holtom with the Bureau of Air Regulation has agreed to an extension until October 1, 1998 on behalf of the Department. Counsel for Gulf has attempted without success to contact Jeffrey Brown with the Office of General Counsel regarding this request.

WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0330045-001-AV be formally extended to and including October 1, 1998.

Respectfully submitted this 22nd day of June, 1998.

HOPPING GREEN SAMS & SMITH, P.A.

Angela R. Morrison

Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(904) 222-7500

Attorney for GULF POWER COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S. Mail on this 22nd day of June, 1998:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Angela R. Morrison
Attorney

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

Gulf Power Company
One Energy Place
Pensacola, FL 32520

_____/

OGC No. 97-1823

DRAFT Permit No.: 0630014-001-AV
Scholz Plant
Jackson County

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 28-106.111(3) and 62-103.050(1), an extension of time, to and including October 1, 1998, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, Gulf states the following:

1. On or about October 6, 1997, Gulf received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0630014-001-AV) for the Scholz Plant located in Escambia County, Florida. Along with the Intent to Issue, Gulf received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."

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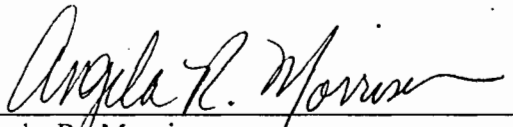
WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0630014-001-AV be formally extended to and including October 1, 1998.

Respectfully submitted this 22nd day of June, 1998.

HOPPING GREEN SAMS & SMITH, P.A.



Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(850) 222-7500

Attorney for GULF POWER COMPANY

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Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Angela Morrison
Attorney

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

GULF POWER COMPANY,

Petitioner,

vs. OGC CASE NO. 97-1824

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.
_____/

ORDER GRANTING REQUEST FOR EXTENSION OF TIME TO FILE PETITION FOR HEARING

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner, Gulf Power Company, to grant an extension of time to file a petition for an administrative hearing on Application No. 0330045-001-AV. See Exhibit 1.

Respondent, State of Florida Department of Environmental Protection, has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until October 1, 1998, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of Environmental Protection, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 25 day of June, 1998, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

F. PERRY ODOM
General Counsel

Douglas Building, MS #35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (904) 488-9314

CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed to:

Angela R. Morrison, Esq.
Post Office Box 6526
Tallahassee, Florida 32314

on this 25 day of June, 1998.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Jeffrey Brown
Assistant General Counsel
Florida Bar No. 0843430

Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (904) 488-9730

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Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Angela R. Morrison
Attorney

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

Gulf Power Company
One Energy Place
Pensacola, FL 32520

/

OGC No. 97-1824

DRAFT Permit No.: 0330045-001-AV
Crist Plant
Escambia County

REQUEST FOR EXTENSION OF TIME

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EXHIBIT 1

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Respectfully submitted this 22nd day of June, 1998.

HOPPING GREEN SAMS & SMITH, P.A.

Angela R. Morrison

Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(904) 222-7500

Attorney for GULF POWER COMPANY

TO Jon th 469-4876

DATE 8/12 TIME 8:36

WHILE YOU WERE OUT

M Dwayne Waters

of

PHONE 850-444-6527
AREA CODE NUMBER EXTENSION

TELEPHONED	PLEASE CALL	WILL CALL AGAIN	
RETURNED YOUR CALL		CALL IMMEDIATELY	
CAME TO SEE YOU		WANTS TO SEE YOU	

MESSAGE Fax #: 850-444-6217

E-mail Glenn.D.Waters@Gulf.com

Change of R.O.

By

D.R. Changes

1) ~~Earl~~ Parsons
2) Fred. Kuester
(RO) 3) ~~G.~~ Ed Holland (Now Going)
(New R.O.) 4) ~~Robert~~ G. Moore
*

crist
No Opacity on monitors 1, 2, 3
gas fired
VE only if > 400 hrs ⇒ A.S.P.
1, 2, 3 SO_2 Fuel Sampling APP.
- Nox CEM. Acid Rain
4, 5, 6, 7 CEMs for compl NOx, SO_2, Opacity

GULF POWER COMPANY

ONE ENERGY PLACE
PENSACOLA, FLORIDA 32520-0328

To: Jonathan Holtom

RECEIVED
JUN 15 1998
BUREAU OF
AIR REGULATION

Company: FDEP

Phone: 850.921.9531

Fax: 850.922.6979

From: Dwain Waters

Company: Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Phone: 850.444.6527

Fax: 850.444.6217

Date: June 15, 1998

Pages including this cover page: 2

Comments:
Original to be FedX to Scott Sheplak today. Charles D. McCrary DR # is 000975 if you need it. Call me on any questions.

Please note that we have a new address and a new area code (see above). Appreciate you updating your address list concerning our company.

One Energy Place
Pensacola, Florida 32520

850.444.6111

GULF POWER
A SOUTHERN COMPANY

June 11, 1998

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Dear Mr. Sheplak:

RE: DESIGNATED REPRESENTATIVE CHANGE
Crist Electric Generating Plant (ORIS Code: 641)
Scholz Electric Generating Plant (ORIS Code: 642)
Lansing Smith Electric Generating Plant (ORIS Code: 643)

Attached, please find copies of new Certificate of Representation for Gulf Power's Electric Generating Plants at Crist, Scholz and Lansing Smith i.e., (ORIS Codes: 641, 642, 643, respectively.) The change in Designated Representative (DR) to Charles D. McCrary is due to the retirement of Mr. Bill M. Guthrie and the need to have a centralized DR for of a system-wide NOx averaging plan for the Southern Company. Additionally, please note that Gulf Power has two named Alternative Designated Representatives (ADR) as now allowed under 40 CFR Part 72. The original signed copies of these Certificate of Representatives were routed to EPA last month and it is my understanding that EPA has given verbal approval of these DR changes for the above referenced plants.

If you have any questions or need further information regarding the change in DR for affected units located at Plant Crist, Scholz or Lansing Smith, please call me at (850) 444.6527.

Sincerely,

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

original → Clair
xc: Elva

Scott Howard 5/7

LEAF
LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION

May 5, 1998

Ms. Katrina Tew
Electric & Gas Division
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 980345, Gulf Power Co. petition for cost recovery for low Nox burners at Crist Units 4 & 5

Dear Ms. Tew:

LEAF has filed as an interested party in this docket. We are very concerned about appropriateness of spending almost a million dollars now for minimal pollution control when Gulf may have to install additional or different pollution control equipment in the near future.

Gulf proposes to install low NOx burners tips at the two units, constructed in 1959 and 1961, respectively. The units have expected retirement dates of 2014 and 2016, respectively. The half-measures being taken by Gulf at units that it proposes to operate for almost another twenty years are minimal efforts at future environmental compliance. The area in which the plant is located, near Pensacola, is predicted to be designated non-attainment for ozone because of recent changes to EPA regulations. NOx emissions are a primarly component of ozone and that designation may require further or different compliance by Gulf.

Preliminary research by LEAF reveals that Gulf could well afford to install selective catlytic reduction (SCR) techology on those units and still operate them at or below the cost of new plants. Low NOx burners only reduce emissions by about half. Crist is one of the dirtiest plants in the state. In 1997, the plant as a whole emitted over 10,300 tons of NOx; over 5 pounds per megawatt hour. Units 4 and 5 were responsible for over 2300 tons of NOx in 1997. SCR would reduce emissions by between 80-90%.

The cost-benefit of installing SCR rather than low NOx burners should be thoroughly reviewed by staff before recommending any course of action to the Commission.

Sincerely,

Gail Kamaras

Gail Kamaras, Director
Energy Advocacy Program

c: Susan Cranmer
Jeff Stone, Esq.
Howard Rhoades, DEP

March 10, 1998

Mr. R. Douglas Neeley, Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics Management Division
United States Environmental Protection Agency
Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8909

Re: Proposed Changes to FPL Proposed Title V Permits to Satisfy EPA Objections

Dear Mr. Neeley:

This letter is to document changes that the Department proposes to satisfy your agency's objections to Florida's Proposed Title V permits for the following Florida Power and Light plants: Lauderdale, Manatee, Martin, Port Everglades, Putnam, Riviera and Turkey Point. These changes result primarily from our meeting with you and your staff and representatives of FPL on March 3, 1998 at your office. That meeting enabled us to clarify many of the issues and identify changes that could be made to the permits that would allow Florida to issue Final Title V permits for these plants. Please review the following proposed changes to the referenced permits. If you concur with our changes, we will issue Final permits with these changes.

The following items and changes are presented generally in the order of our discussion of the issues at our March 3rd meeting.

Manatee, Martin, Port Everglades, Riviera and Turkey Point

For the units with COMS, permit conditions will be added that requires the owner or operator to maintain and operate COMS and make and maintain records of their readings for purposes of periodic monitoring. The following condition will be added:

Add a new condition to each permit in the sections for the fossil fuel steam generators titled **Record Keeping and Reporting Requirements**:

X.x. COMS for Periodic Monitoring. The owner or operator is required to install continuous opacity monitoring systems (COMS) pursuant to 40 CFR Part 75. The owner or operator shall maintain and operate COMS and shall make and maintain records of opacity measured by the COMS, for purposes of periodic monitoring.
[Rule 62-213.440, F.A.C., and applicant agreement with EPA]

Port Everglades and Lauderdale

Pursuant to our discussion, for simple-cycle and combined-cycle combustion turbine units without COMS, the permits will be revised to require that each unit shall have a Method 9 visible emissions test conducted upon exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given year. The statement of basis for these permits will be revised to include a demonstration supporting such a testing frequency, specifically referring to the low historical operational use of fuel oil and the difficulty of scheduling VE tests for remote-started units. The following specific changes will be made:

Add to the statement of basis for Lauderdale and Port Everglades:

> The Department has determined that the appropriate VE testing frequency for the simple-cycle turbines is a VE test upon exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given year. This frequency is justified by the low historical operational use of fuel oil for these units and the previous VE tests which documented compliance while firing fuel oil. The Lauderdale units have fired fuel oil a total of 34.5 hours in 1992, 17.4 hours in 1993, 8.4 hours in 1994, 2.4 hours in 1995, 282.4 hours in 1996, and 11.1 hours in 1997. The Port Everglades units have fired fuel oil a total of 50.5 hours in 1992, 30.7 hours in 1993, 7.9 hours in 1994, 2.5 hours in 1995, 4.1 hours in 1996, and 5.9 hours in 1997.

Also add to the statement of basis for Lauderdale

> The Department has determined that the appropriate VE testing frequency for the combined-cycle turbines is a VE test upon exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given year. This frequency is justified by the low historical operational use of fuel oil for these units and the previous VE tests which documented compliance while firing fuel oil. These units have fired fuel oil a total of 97.7 hours in 1993 (the year that PM testing was conducted on oil), 12.0 hours in 1994, 0.0 hours in 1995, 0.2 hours in 1996, and 0.0 hours in 1997. The combined-cycle turbines were not operational prior to 1993.

The permit for Lauderdale will be revised:

> **B.14.** Visible Emissions Testing Required. The owner or operator shall conduct testing for visible emissions, using EPA Method 9, while the combustion turbine is operating at 90-100 percent of its capacity, according to the following schedule.
>
> The owner or operator shall conduct testing for visible emissions while firing fuel oil for each simple-cycle turbine unit upon that turbine's exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given federal fiscal year (October 1 through September 30). Such tests shall be performed within 15 days of exceeding such operating hours, to allow for prior notification of the tests.
>
> Regardless of the number of hours of operation on fuel oil, at least one compliance test shall be conducted on all twenty-four combustion turbines every five years, coinciding with the term of the operation permit for these turbines. At least one quarter of such tests shall be conducted while burning fuel oil, and at least one quarter of such tests shall be conducted while burning natural gas. [Rule 62-213.440, F.A.C., applicant agreement with EPA, and AC06-179848, Specific Condition No. 23]

The permit for Port Everglades will be revised:

C.6. Visible Emissions Testing Required. The owner or operator shall conduct testing for visible emissions, using EPA Method 9, while the combustion turbine is operating at 90-100 percent of its capacity, according to the following schedule.

The owner or operator shall conduct testing for visible emissions while firing fuel oil for each simple-cycle turbine unit upon that turbine's exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given federal fiscal year (October 1 through September 30). Such tests shall be performed within 15 days of exceeding such operating hours, to allow for prior notification of the tests.
[Rule 62-213.440, F.A.C., applicant agreement with EPA, and AO 06-230618]

Add to the permit for Lauderdale:

A.19. Except as specified in this condition for visible emissions testing on fuel oil, annual compliance tests shall be performed on each combustion turbine unit with the fuel(s) used for more than 400 hours in the preceding 12-month period. Tests shall be conducted using EPA reference methods, or equivalent, in accordance with the July 1, 1996 version of 40 CFR 60 Appendix A. The stack test for each turbine shall be performed according to the requirements of specific condition **A.20**.

Pollutant	**EPA Reference Method**	**Gas**	**Oil**
Particulate Matter	5 or 17		X
Visible Emissions	9	X	X
Carbon Monoxide	10	X	X
Nitrogen Oxides	20	X	X
Volatile Organic Compounds	25A	X	X
	Test Method		
Sulfur content	ASTM D 2880-96*		X
	ASTM D 1072-90(94) E-1, ASTM D 3031-81(86), ASTM D 4084-94, or ASTM D 3246-92*	X	

*or the latest edition.

The owner or operator shall conduct testing for visible emissions while firing fuel oil, using EPA Method 9, for each combustion turbine unit upon that turbine's exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given year. Such tests shall be performed within 15 days of exceeding such operating hours, to allow for prior notification of the tests.
[Rule 62-213.440, F.A.C., applicant agreement with EPA, and PSD-FL-145, Specific Condition No. 10]

Manatee, Martin, Port Everglades, Riviera and Turkey Point

After reviewing historical particulate emissions data for these plants, the Department believes that a demonstration is appropriate, based on that data, to support the permit's annual PM testing frequency. As discussed in our meeting, these facilities are subject to a steady-state PM emission limit of 0.1 lb/mmBtu, which is effectively equivalent to 0.149 lb/mmBtu because of rounding, and 0.3 lb/mmBtu for soot blowing, which is equivalent to 0.349 lb/mmBtu. We proposed evaluating the required PM testing frequency based on the historical average test results, with sources with historical emissions less than half the standard required to test annually, sources with historical emissions less than three quarters of the standard required to test semi-annually, and the remaining sources required to test quarterly. FPL has presented historical PM test results which show that the steady-state and soot blowing average results are less than half the applicable effective standards. The statement of basis for these permits will be revised to include a demonstration supporting an annual testing frequency, specifically referring to the low historical emission rate in relation to the effective standards for steady-state operation and soot-blowing operation. The following specific changes will be made:

Add to the statement of basis for each permit:

> The Department has determined that the appropriate particulate testing frequency for the fossil fuel steam generators is annually whenever fuel oil is used for more than 400 hours in the preceding year. This frequency is justified by the low emission rate documented in previous emissions tests while firing fuel oil. These units are subject to a steady-state PM emission limit of 0.1 lb/mmBtu, which is effectively equivalent to 0.149 lb/mmBtu because of rounding, and 0.3 lb/mmBtu for soot blowing, which is equivalent to 0.349 lb/mmBtu. FPL has presented historical PM test results which show that the steady-state and soot blowing average results are less than half the applicable effective standards. The Department has determined that sources with emissions less than half of the effective standard shall test annually. A summary of results of particulate emission testing in lb/mmBtu for the units at Martin* are 0.057 (steady-state) and 0.059 (soot-blowing).

* The revised statement of basis for the following facilities will reflect the appropriate emission test results: results for Manatee are 0.066 (steady-state) and 0.081 (soot-blowing); Port Everglades are 0.059 (steady-state) and 0.068 (soot-blowing); Riviera are 0.063 (steady-state) and 0.079 (soot-blowing); Turkey Point are 0.048 (steady-state) and 0.061 (soot-blowing).

Lauderdale

For the combined-cycle combustion turbine units, the Department believes that annual PM testing is appropriate, and may be justified through a demonstration in the statement of basis. The statement of basis for these permits will be revised to include a demonstration supporting such a testing frequency, specifically referring to the low historical operational use of fuel oil for these units and the low emission rate documented in previous emissions tests while firing fuel oil. The following specific changes will be made:

Add to the statement of basis:

> The Department has determined that the appropriate particulate testing frequency for the combined-cycle turbines is annually whenever fuel oil is used for more than 400 hours in the preceding 12-month period. This frequency is justified by the low historical operational use of fuel oil for these units and the low emission rate documented in previous emissions tests while firing fuel oil. These

units have fired fuel oil a total of 97.7 hours in 1993 (the year that PM testing was conducted on oil), 12.0 hours in 1994, 0.0 hours in 1995, 0.2 hours in 1996, and 0.0 hours in 1997. The units were not operational prior to 1993. Results of particulate emission testing conducted on the combined cycle combustion turbines in 1993 while firing fuel oil show that all turbines had emissions well below the PM emission limit. Average particulate emissions for Unit 4A was 41.4 lb/hr, Unit 4B was 52.0 lb/hr, Unit 5A was 45.9 lb/hr, and Unit 5B was 48.0 lb/hr, versus an emission limit for each unit of 58 lb/hr.

Manatee, Port Everglades and Riviera (and Martin and Turkey Point)

A permit condition will be added for each of these plants requiring the owner or operator to conduct emission tests while injecting additives consistent with normal operating practices approved by the Department. The statement of basis will also be revised to discuss the purpose of the additives. The following specific changes will be made:

Add to the statement of basis for each permit:

FPL may inject additives such as magnesium oxide, magnesium hydroxide and related compounds into each boiler for the purposes of reducing build-up of particulate matter on the interior boiler surfaces, to facilitate proper heat transfer and other boiler operation, and to reduce the particulate matter required to be removed from boiler surfaces during soot blowing and other boiler cleaning operations. The rate of additive injection is not large, generally on the order of 1 gallon of additive per approximately 2,500 (± 500) gallons of fuel oil (this is approximately 0.04% by volume). The permit requires that emission tests be conducted while injecting additives consistent with normal operating practices approved by the Department.

Add a new condition to each permit in the sections for the fossil fuel steam generators titled **Test Methods and Procedures** for the Manatee, Port Everglades and Riviera and Martin plants, and the section titled **Monitoring and Testing Requirements** for the Turkey Point plant:

X.x. Testing While Injecting Additives. The owner or operator shall conduct emission tests while injecting additives consistent with normal operating practices approved by the Department. [Rule 62-213.440, F.A.C., applicant agreement with EPA]

Manatee, Port Everglades, Riviera and Turkey Point

No revisions of the permits are necessary to allow the 40 percent opacity limit. All parties in the meeting agreed that the previous Secretary orders are consistent with Florida's SIP and do not represent a variance from SIP requirements. The use of the word "variance" in these orders was not intended in the legal context but was instead intended to represent a difference or change. This issue is considered resolved, so no changes to the permits will be made.

The note in conditions A.14 and B.14 of the Port Everglades permit that refers to an informal agreement regarding visible emissions is not intended to be an enforceable part of the permit, so we agree it is not an enforceable condition. It is instead intended to identify the agreement for the information of the compliance inspector. No change to the permit is needed.

Manatee

The permit will be revised to limit the sulfur content of the fuel received at the plant to 1.0 percent by weight, and require fuel analysis by either the vendor or FPL to document compliance with the sulfur limit.

Add to the permit:

A.9. Sulfur Dioxide. The sulfur content of liquid fuels burned shall not exceed 1.0 percent by weight, as received at the plant. See specific conditions **A.9, A.15, A.23 and A.24** of this permit. [Rules 62-213.440 and 62-296.405(1)(c)1.g., F.A.C., and applicant agreement with EPA]

A.24. The following fuel sampling and analysis protocol shall be used as an alternate sampling procedure authorized by permit to demonstrate compliance with the sulfur dioxide standard:

Compliance with the liquid fuel sulfur limit shall be verified by a fuel analysis provided by the vendor upon each fuel delivery at the Port Manatee Fuel Oil Terminal with the following exception: in cases where No. 6 fuel oil is received with a sulfur content exceeding 1.0 percent by weight, and blending at the terminal is required to obtain a fuel mix equal to the applicable percent sulfur limit, an analysis of a fuel sample representative of fuel from the fuel storage tanks shall be performed prior to transferring oil to the Manatee plant. Reports of percent sulfur content of these analyses will be maintained at the power plant facility.

The owner or operator shall maintain records of the as-fired fuel oil heating value, density or specific gravity, and the percent sulfur content. Fuel sulfur content, percent by weight, for liquid fuels shall be determined by either ASTM D2622-94, ASTM D4294-90 (95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88 and ASTM D129-95 (or latest editions) to analyze a representative sample of the fuel oil.
[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C., and applicant agreement with EPA]

Lauderdale, Manatee, Martin, Putnam and Turkey Point

The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity, to establish appropriate emission limits and to aid in determining future rule applicability. A note will be added to the permitted capacity condition for each permit clarifying this, and an explanation that regular record keeping is not required for heat input will be added to the statement of basis. The following specific changes will be made:

Add to the statement of basis for each permit:

The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity, to establish appropriate emission limits and to aid in determining future rule applicability. A note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop

measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

Add to each permit below the condition titled Permitted Capacity:

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity, to establish appropriate emission limits and to aid in determining future rule applicability.}

Manatee, Martin, Port Everglades, Riviera and Turkey Point

No revisions of the permits are necessary to address the comment related to records of soot blowing and load changes. All parties in the meeting agreed that the current permit requirements related to reporting of excess emissions are sufficient to satisfy this comment. FPL will continue to document and report excess emission events. This issue is considered resolved, so no changes to the permits will be made.

Lauderdale and Martin

The permits will be revised to specify that the 12-month average sulfur content be calculated as a weighted average based upon the sulfur content of the oil and the amount burned on a daily basis. The following specific changes will be made:

The permit for Lauderdale will be changed:

A.13. Sulfur Dioxide. The sulfur content of the light distillate fuel oil shall not exceed a maximum of 0.3 percent, by weight, and shall not exceed an average of 0.2 percent, by weight, during any consecutive 12-month period. The 12-month average sulfur content shall be calculated as a weighted average based upon the sulfur content of the oil and the amount burned on a daily basis. Compliance shall be demonstrated in accordance with the requirements of 40 CFR 60.335 by testing all oil shipments for sulfur content, nitrogen content, and heating value, using ASTM D 2800-96 or the latest edition.
[Rule 62-213.440, F.A.C., applicant agreement with EPA, and PSD-FL-145, Specific Conditions No. 5 and No. 11]

The permit for Martin will be changed:

B.28. The average sulfur content of the light distillate oil shall not exceed 0.3%, by weight, during any consecutive 12-month period. The maximum sulfur content of the light distillate fuel oil shall not exceed 0.5%, by weight. The 12-month average sulfur content shall be calculated as a weighted average based upon the sulfur content of the oil and the amount burned on a daily basis. Compliance shall be demonstrated in accordance with the requirements of 40 CFR 60.334 by testing for sulfur content, for nitrogen content, and for heating value of oil storage tanks once per day when firing oil using ASTM D 2880-96.
[Rule 62-213.440, F.A.C., applicant agreement with EPA, and PSD-FL-146, Specific Condition No. 11]

C.8. Sulfur Dioxide. Sulfur dioxide emissions limitations for the auxiliary steam boiler are established by firing natural gas or limiting the light distillate fuel oil's average sulfur content to 0.3%, by weight, during any consecutive 12-month period. The 12-month average sulfur content

shall be calculated as a weighted average based upon the sulfur content of the oil and the amount burned on a daily basis.
[Rule 62-213.440, F.A.C., applicant agreement with EPA, and PSD-FL-146, revised 7/19/93]

D.3. Sulfur Dioxide. Sulfur dioxide emissions limitations for the diesel generator are established by limiting the light distillate fuel oil's average sulfur content to 0.3%, by weight, during any consecutive 12-month period. The 12-month average sulfur content shall be calculated as a weighted average based upon the sulfur content of the oil and the amount burned on a daily basis.
[Rule 62-213.440, F.A.C., applicant agreement with EPA, and PSD-FL-146, revised 7/19/93]

Port Everglades and Riviera (and Turkey Point)

No revisions of the permits are necessary to address the comment related to operation in the event the CEMS become temporarily inoperable. All parties in the meeting agreed that the current permit requirements related to firing fuel oil and gas in the event of temporary CEMS inoperability are sufficient to satisfy this comment. The Turkey Point permit was mentioned in the comment. As discussed briefly, the Department will revise the Turkey Point permit to be consistent with the Port Everglades and Riviera permits. This issue is considered resolved, so no changes to the Port Everglades and Riviera permits will be made.

The permit for Turkey Point, however, will be revised to be similar to the Port Everglades and Riviera permits:

A.13. Sulfur Dioxide. The permittee shall demonstrate compliance with the sulfur dioxide limit of specific condition A.9 of this permit by the following:
a. Through the use of CEMS installed, operated, and maintained in accordance with the quality assurance requirements of 40 CFR 75, adopted and incorporated by reference in Rule 62-204.800 F.A.C. A relative accuracy test audit of the SO_2 CEMS shall be conducted at least annually. Compliance shall be demonstrated on a 3-hour rolling average.
b. In the event the CEMS becomes temporarily inoperable or interrupted, the fuel oil sulfur content and the maximum fuel oil to natural gas firing ratio is limited to that which was last used to demonstrate compliance prior to the loss of the CEMS. Alternatively, the boilers may fire 100 percent fuel oil or 100 percent natural gas with a maximum sulfur content of 1.0 percent by weight, or less. See specific condition A.19.
[Rule 62-204.800, 62-213.440, 62-296.405(1)(c)3., F.A.C., AO13-238932, AO13-238939]

Port Everglades, Riviera and Turkey Point

The possible malfunctions related to sulfur dioxide emissions at these plants that were discussed at the meeting were unexpected loss of natural gas supply at the plant or failure of the fuel feed system. Another malfunction that could occur is burner failure. The Department agreed to remove the reference to malfunction in the sulfur dioxide emissions permit conditions. The excess emission provisions from Rule 62-210.700 are applicable, and are already included in the permit. A comment will be added to the statement of basis clarifying this issue. The following specific changes will be made:

Add to the statement of basis for each permit:

This facility is allowed to co-fire natural gas with fuel oil in any ratio that will cause emissions to not exceed the sulfur dioxide limitation of this permit. The permit specifies that compliance with the sulfur dioxide standard shall be based on the total heat input from all liquid and gaseous fuels

burned. The permit also requires that the sulfur dioxide emission limitation shall apply at all times including startup, shutdown, and load change. However, excess emissions of sulfur dioxide are allowed during malfunctions in accordance with the excess emissions conditions of this permit, which are based on Rule 62-210.700, F.A.C. Malfunctions that could occur and affect sulfur dioxide emissions include unexpected loss of natural gas supply at the plant, failure of the fuel feed system or burner failure.

The permit for Port Everglades (conditions A.8 and B.8), Riviera (condition A.9) and Turkey Point (condition A.9) will be changed:

X.x. Sulfur Dioxide. Sulfur dioxide emissions shall not exceed 2.75 pounds per million Btu heat input, as measured by applicable compliance methods. Compliance shall be based on the total heat input from all liquid and gaseous fuels burned. The sulfur dioxide emission limitation shall apply at all times including startup, shutdown, and load change.
[Rules 62-213.440 and 62-296.405(1)(c)1.j., F.A.C.]

Lauderdale, Manatee, Martin, Port Everglades, Putnam, Riviera and Turkey Point

Appendix E-1 will be replaced with Appendix I-1 that includes Florida's standard language that refers to Insignificant Emissions Units and/or Activities. We understand that EPA has already reviewed this appendix for similar sources, so the actual text will not be reproduced here.

Please advise as soon as possible if you concur with the specific changes detailed above. Please call me at 850/921-9503 if you have any questions. You may also contact Mr. Scott Sheplak, P.E., at 850/921-9532 if you need any additional information.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CF/jk

cc: Howard L. Rhodes
Scott Sheplak
Pat Comer
Rich Piper, FPL

Crist Modeling was ok.
I have a copy of the
second comments and am
waiting for resolution of
the "FCG" Letter before
I continue processing

J. A. 2/17/98

I believe this is the original?

-Died-

Jonathan,

FCG letter response / guidance
memo pending. {Sc. H
2/23/98

LABOR FINDERS
WORKER INSURED — CONTRACT LABOR
Labor on Demand

FT. WALTON BEACH (904) 243-2699 | GAINESVILLE (904) 373-5777 | TALLAHASSEE (904) 222-7378

Scott 2/16

What is status of Christ. Cleve says modeling was okay?

Clair

Jonathan,

Please get w/ Cleve on this one.

Scott
2/17

Scholz #'s From Carol Melton

DEPARTMENT OF ENVIRONMENTAL PROTECTION FLORIDA

From PM Test	Unit 1	Unit 2
1995	49.7 Ft/S	54.4 Ft/S
	15.1 M/S	16.6 M/S
+10%	16.6 M/S	18.26
96	43.7	49.7
	13.3	15.1
	14.6	16.6
97	47.0	54.0
	~~14.3~~	16.5
	15.7	18.1

Avg of [#] = 16.6 M/S Not 21.41

exit dimeter = 13-5 FT = 4.11 M

* These #'s are measured in duct A = 89.333 FT², Not in Stack.
need to add ACFM's + divide by Area of Stack Outlet

TO Jon

DATE 7/7 TIME 9:11

WHILE YOU WERE OUT

M Wayne Mason

of Peavy & Sons

PHONE 539-5019

AREA CODE NUMBER EXTENSION

TELEPHONED		PLEASE CALL	✓	WILL CALL AGAIN	
RETURNED YOUR CALL			CALL IMMEDIATELY		
CAME TO SEE YOU			WANTS TO SEE YOU		

MESSAGE _____

By J. A.

.0006 ⟺ 0.75 lb/MMBTU
(0.2%)

0.0024 ⟺ 0.7509 lb/MMBTU
(0.8%/100 CPI)

$$\frac{.0024}{0.8} = \frac{x}{10} \qquad x = 0.03$$

$$\frac{.75}{.0006} = \frac{x}{.03} \qquad x = 37.5 \text{ lb/MMBTU}$$

$$\frac{.0006}{.0024} = \frac{0.75}{\quad}$$

Scholz

Wall Fired
~~Vertically Fired~~, Dry bottom 0.5 lb/MMBtu

2 Units. 645.7 MMBtu/hr each

× 2

1291.4 × 0.5 × 8760 / 2000

= 2828. TPY

× 25

$70,704

~~Crist~~ Smith Tangentially Fired Dry Bottom 0.40 lb/MMBtu

Unit 1 - 1944.8

Unit 2 - 2246.2

4191 MMBTU/hr

× .4

1676.4 lb/hr

= 7342.6 TPY

default 4,000 TPY ⇒ $100,000

Crist

DEPARTMENT OF ENVIRONMENTAL PROTECTION
FLORIDA

Sub. Phase I

Unit 4 1096.7 MMBTU/hr Tangy. Fired, Dry Bottom

Unit 5 1096.7

2193.4 X 0.45 X 8760 ÷ 2000 = 4,323 TPY

4000 TPY Max $100,000

MODEL RESULTS SCHOLZ-Using 3tiered bldg BEEST

(All Values in ug/m^3)

	MET DATA	ANNUAL			H2h 24-HOUR			H2h-3 HOUR		
		AAQS=60			AAQS=260			AAQS=1330		
		CONC	RECEP		CONC	RECEP		CONC	RECEP	
1985	TALLAHASSEE	15			267			**1245**		
1986	TALLAHASSEE	15			256			856		
1987	TALLAHASSEE	**28**			446			941		
1988	TALLAHASSEE	24			246			923		
1989	TALLAHASSEE	13			208			711		

Files: 853tier.bst, 863tier.bst, 873tier.bst, 883tier.bst, 893tier.bst

→ 3.6 lb/MM BTU

Based on 3 tiered buildings

Prime not approved until 1999-2000

Proposed in 1998

6.17 X .77 =

4.75 lb/MMBTU

Mult by 110% (645.7)

SCHOLZ

Nat Gas 100%

	Boilers	
1.	1,320	X 2.75
2.	2320	
3.	550	
4.	1096.7	X 5.9
5.	1096.7	X 5.9
6.	3709.8	X 5.9
7.	6406.4	X 5.9

CRIST

Air Quality Modeling Analyses for Plant Smith

On behalf of Gulf Power Company, Southern Company Services (SCS) has reviewed the air quality modeling analysis conducted by FDEP to estimate SO_2 impacts due to the operation of Plant Smith. This letter summarizes the results of that review and recommends 1) corrections to the stack input data and 2) remodeling using the corrected data. Our comments and the results of our re-analyses follow:

1. The stack exit velocity used in the FDEP analysis does not represent the total actual volumetric flow rate from both boilers. Recent stack test data indicate an average flow rate of 712,062 ACFM for Unit 1 and 856,244 ACFM for Unit 2, for a total stack flow rate of 548,317 ACFM. This flow rate corresponds to an exit velocity of 31.3 m/sec for the stack diameter of 5.49 m. The exit temperature used in the FDEP modeling was corrected to 334° F which is based on stack test data.

2. Adjustments to the stack exit velocity and temperature were incorporated and the ISC model was re-run for the five-year meteorology for 1) a 100-950 meters polar grid and receptors on the Gulf Power Company's proposed fence line, and 2) a 1000 – 5500 meters polar grid and receptors on the Gulf Power Company's proposed fence line. Set 2) modeling represents polar grid receptors at 1000 m. (which is the minimum straight line distance between the power plant stack and the nearest power company's property line) and beyond.

The model results for the later case indicate that the highest of the second-high impacts for each year are within the State's Ambient Air Quality Standards for all averaging times. The inputs and outputs of the ISCST3 runs conducted at SCS are provided on the enclosed diskettes.

Stanley S. Vasa
Southern Company Services
12/12/97

YR	MET	ANNUAL			H2H-24 HR.			H2H-3 HR.		
		AAQS=60			AAQS=260			AAQS=1330		
		CONC	RECEP		CONC	RECEP		CONC	RECEP	
1986	PENSACOLA	27	-303	175	468	-303	175	1066	-69	394
1987	PENSACOLA	40	-303	175	680	-303	175	1544	-303	175
1988	APALACHICOLA	47	-303	175	523	-303	175	877	257	-306
1989	"	31	-303	175	849	-303	175	849	-303	175
1990	"	68	-303	175	719	-303	175	2751	-376	137

Table 1: Plant Smith Modeling: 100-950 meters polar grid and receptors on the Gulf Power's proposed fence line.

YR	MET	ANNUAL			H2H-24 HR.			H2H-3 HR.		
		AAQS=60			AAQS=260			AAQS=1330		
		CONC	RECEP		CONC	RECEP		CONC	RECEP	
1986	PENSACOLA	9.3	0	4500	109	-958	803	653	-957	803
1987	PENSACOLA	9.2	0	-5500	163	-594	343	592	625	-1082
1988	APALACHICOLA	12.6	-3830	3214	116	-2892	3447	555	-1500	2598
1989	"	12.3	-3639	3053	119	-3464	2000	579	-217	1231
1990	"	17.6	-4330	2500	145	-3830	3214	753	-594	346

Table 2: Plant Smith Modeling: 1 km and beyond polar grid and receptors on the Gulf Power's proposed fence line.

Note: The center of the grid is the stack of the power plant.
Receptor distances are in meters and concentrations are in micrograms/cu. meter.

GULF POWER COMPANY

ONE ENERGY PLACE
PENSACOLA, FLORIDA 32520-0328

To: Jonathan Holtom

Company: FDEP

Phone: 921-9531

Fax: 922-6979

From: Duane Waters

Company: Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Phone: (850) 444-6527

Fax: 850.444.6217

Date: JAN 26, 1998

Pages including this cover page: 4

Comments:
FCG letter on Title V issues to Clair Fancy.

Please note that we have a new address and a new area code (see above). Appreciate you updating your address list concerning our company.

FLORIDA ELECTRIC POWER COORDINATING GROUP, INC. (FCG)
405 REO STREET, SUITE 100 • (813) 289-5644 • FAX (813) 289-5648
TAMPA, FLORIDA 33609-1094

December 17, 1997

Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Re: Clarifications in Title V Permits

Dear Mr. Fancy:

Several members of the Florida Electric Power Coordinating Group, Inc. (FCG) have identified commonly recurring issues regarding the content of draft Title V permits. The FCG is submitting this letter in an effort to resolve, and allow for the processing of, Title V permits in as simple, efficient and expedient manner as possible. In this regard, the FCG requests an opportunity to discuss these issues with you and appropriate members of your staff as soon as possible. Please contact either me at (813) 886-1344 or Robert Manning at Hopping Green Sams & Smith at (850) 222-7500.

1. Excess Emissions Resulting from Malfunctions. In accordance with Chapter 62-210, F.A.C., the FCG understands that sources are required to notify the Department whenever a malfunction occurs that results in excess emissions for a period longer than two hours during any 24-hour period. If the period lasts for no less than two hours during any 24-hour period, and appropriately results from a malfunction, the FCG believes, based on DEP's historic interpretation and implementation, that the rules do not require notification. More specifically, Rule 62-210.200(119), F.A.C. defines "excess emissions" as "emissions of pollutants in excess of those allowed by any applicable air pollution rule of the Department or by a permit issued pursuant to any such rule or Chapter 62-4, F.A.C." The Department's Rule 62-210.700(1), F.A.C. authorizes excess emissions resulting from malfunctions for no more than two hours in a 24-hour period. Because Rule 62-210.700(1), F.A.C. allows such emissions, they are excluded from the definition of "excess emissions" under Rule 62-210.200(119), F.A.C. Rule 62-210.700(6), in turn, states that "[i]n case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate local program in accordance with Rule 62-4.130, F.A.C." Accordingly, if such emissions are not defined as excess emissions, then they are not subject to the reporting requirement under Chapter 62-210.700(6), F.A.C. Moreover, the majority of excess emissions resulting from malfunctions are very brief (often a couple of minutes), and it does not seem practical or necessary to notify the Department every time such an incident occurs. The FCG agrees that if the excess emissions

occur for a period exceeding two hours in any 24-hour period, then notification must be made to the Department in accordance with Rule 62-4.130, F.A.C.

The Department has apparently recently taken the position in some draft Title V permit negotiations that notification must be made for *all* malfunctions that result in emissions greater than the permit limit regardless of the duration of the excess. The FCG believes that this interpretation is contrary to the express language in the rules, as described above, as well as the Department's historic interpretation and implementation, and requests the Department's concurrence that notification is only required for excess emissions resulting from a malfunction for a period greater than two hours in any 24-hour period.

2. Determination of "Load Change". Pursuant to Rule 62-210.700(3), F.A.C., excess emissions resulting from "load change" are allowed from existing utility boilers under certain conditions. A load change is said to occur "when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than start-up or shut-down, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more." Because the rules do not specify otherwise, the FCG requests confirmation that it can determine a unit's operational capacity based on megawatt output, the method currently used by many utilities. Alternative methods to determine capacity are often not as accurate nor practicable because of the short-time span for determining the rate change. The FCG is not aware of any express rule language or guidance document contrary to our understanding and, therefore, simply wants to obtain the Department's concurrence that megawatt output be used for purposes of this rule in determining what constitutes a load change.

3. Averaging Time for COM Data. Several draft Title V permits issued by the Department allow for the demonstration of compliance with an opacity limit based on continuous opacity monitors (COMs), which record and report opacity in block six minute intervals. The FCG requests the Department's assistance in specifying in Title V permits that opacity compliance demonstrations utilizing COM data be based on a "block average." Because the COMs record and report opacity in "block intervals," the FCG is concerned that if no clarification is provided in the Title V permit, the permit condition could be construed to be a rolling average, with which the source would not be adequately prepared to demonstrate compliance.

4. Capacity Determinations. The FCG requests that the Department specify in Title V permits, when requested, that a required determination of heat input be based on fuel sampling and analysis, rather than not specifying a method for such determination. This clarification has been provided in some utilities' draft Title V permits and the FCG requests that the Department consistently implement this interpretation. In some instances, it might even be more appropriate to allow heat input to be calculated based on an F-factor or to define capacity in terms of

megawatt output. This type of specificity provides everyone with a better understanding of the requirements with which a facility must comply. It is not appropriate for the permit to be silent on this issue.

5. **Recordkeeping for Used Oil.** Several FCG members' Title V permits contain permit conditions which require monthly records to be kept regarding the quantity of used oil "generated and burned". The FCG requests confirmation of its understanding that records only need to be kept if the used oil is burned, and that separate records do not need to be kept regarding the generation of oil and the burning of oil. Many facilities generate small quantities of used oil on-site that is not burned and it is not appropriate or necessary to require monthly recordkeeping when the used oil is not intended to be burned. The FCG agrees that recordkeeping conditions regarding the quantity of used oil actually burned are often appropriate.

Thank you for considering these issues, and we look forward to discussing them with you and your staff within the next few weeks. Please call us with any questions in the meantime.

Sincerely,

Robert A. Manning

for/ J. Michael Kennedy, Chair
FCG Air Subcommittee

cc: Scott Sheplak, DEP, BAR
Pat Comer, DEP, OGC
FCG Air Subcommittee
Angela Morrison, HGSS
Robert Manning, HGSS2

[illegible]

GULF POWER COMPANY

ONE ENERGY PLACE
PENSACOLA, FLORIDA 32520-0328

To: Jonathan Holtom

Company: FDEP-Tallahassee

Phone: (850) 921-9531

Fax: (850) 922-6979

From: Dusan Waters

Company: Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Phone: (850) 444-6527

Fax: 850.444.6217

Date: JAN. 23, 1998

Pages including this cover page: 4

Comments:
Smith Ambient Air Model Results. Please call me on any questions.

Please note that we have a new address and a new area code (see above). Appreciate you updating your address list concerning our company.

Air Quality Modeling Analyses for Plant Smith

On behalf of Gulf Power Company, Southern Company Services (SCS) has reviewed the air quality modeling analysis conducted by FDEP to estimate SO_2 impacts due to the operation of Plant Smith. This letter summarizes the results of that review and recommends 1) corrections to the stack input data and 2) remodeling using the corrected data. Our comments and the results of our re-analyses follow:

1. The stack exit velocity used in the FDEP analysis does not represent the total actual volumetric flow rate from both boilers. Recent stack test data indicate an average flow rate of 712,062 ACFM for Unit 1 and 856,244 ACFM for Unit 2, for a total stack flow rate of 548,317 ACFM. This flow rate corresponds to an exit velocity of 31.3 m/sec for the stack diameter of 5.49 m. The exit temperature used in the FDEP modeling was corrected to 334° F which is based on stack test data.

2. Adjustments to the stack exit velocity and temperature were incorporated and the ISC model was re-run for the five-year meteorology for 1) a 100-950 meters polar grid and receptors on the Gulf Power Company's proposed fence line, and 2) a 1000 – 5500 meters polar grid and receptors on the Gulf Power Company's proposed fence line. Set 2) modeling represents polar grid receptors at 1000 m. (which is the minimum straight line distance between the power plant stack and the nearest power company's property line) and beyond.

The model results for the later case indicate that the highest of the second-high impacts for each year are within the State's Ambient Air Quality Standards for all averaging times. The inputs and outputs of the ISCST3 runs conducted at SCS are provided on the enclosed diskettes.

Stanley S. Vasa
Southern Company Services
12/12/97

YR	MET	ANNUAL			H2H-24 HR.			H2H-3 HR.		
		AAQS=60			AAQS=260			AAQS=1330		
		CONC	RECEP		CONC	RECEP		CONC	RECEP	
1986	PENSACOLA	27	-303	175	468	-303	175	1066	-69	394
1987	PENSACOLA	40	-303	175	680	-303	175	1544	-303	175
1988	APALACHICOLA	47	-303	175	523	-303	175	877	257	-306
1989	"	31	-303	175	849	-303	175	849	-303	175
1990	"	68	-303	175	719	-303	175	2751	-376	137

Table 1: Plant Smith Modeling: 100-950 meters polar grid and receptors on the Gulf Power's proposed fence line.

YR	MET	ANNUAL			H2H-24 HR.			H2H-3 HR.		
		AAQS=60			AAQS=260			AAQS=1330		
		CONC	RECEP		CONC	RECEP		CONC	RECEP	
1986	PENSACOLA	9.3	0	4500	109	-958	803	653	-957	803
1987	PENSACOLA	9.2	0	-5500	163	-594	343	592	625	-1082
1988	APALACHICOLA	12.6	-3830	3214	116	-2892	3447	555	-1500	2598
1989	"	12.3	-3639	3053	119	-3464	2000	579	-217	1231
1990	"	17.6	-4330	2500	145	-3830	3214	753	-594	346

Table 2: Plant Smith Modeling: 1 km and beyond polar grid and receptors on the Gulf Power's proposed fence line.

Note: The center of the grid is the stack of the power plant.
Receptor distances are in meters and concentrations are in micrograms/cu. meter.

Degrees indicate the discrete polar receptors selected to model impact along the Gulf proposed fenceline.

1" = 833'

To:
Dwain Waters
420-6219

From: Stan Vinsa

8. Transfer of Permits.
(1) Within 30 days after the sale or legal transfer of a permitted facility, an "Application for Transfer of Permit" (DEP Form 62-1.201(1)) must be submitted to the Department. This form must be completed with the notarized signatures of both the permittee and the proposed new permittee.
(2) The Department shall approve the transfer of a permit unless it determines that the proposed new permittee cannot provide reasonable assurances that conditions of the permit will be met. The determination shall be limited solely to the ability of the new permittee to comply with the conditions of the existing permit, and it shall not concern the adequacy of these permit conditions. If the Department proposes to deny the transfer, it shall provide both the permittee and the proposed new permittee a written objection to such transfer together with notice of a right to request a Chapter 120, F.S., proceeding on such determination.
(3) Within 30 days of receiving a properly completed Application for Transfer of Permit form, the Department shall issue a final determination. The Department may toll the time for making a determination on the transfer by notifying both the permittee and the proposed new permittee that additional information is required to adequately review the transfer request. Such notification shall be served within 30 days of receipt of an Application for Transfer of Permit form, completed pursuant to Rule 62-4.120(1), F.A.C. If the Department fails to take action to approve or deny the transfer within 30 days of receipt of the completed Application for Transfer of Permit form, or within 30 days of receipt of the last item of timely requested additional information, the transfer shall be deemed approved.
(4) The permittee is encouraged to apply for a permit transfer prior to the sale or legal transfer of a permitted facility. However, the transfer shall not be effective prior to the sale or legal transfer.
(5) Until this transfer is approved by the Department, the permittee and any other person constructing, operating, or maintaining the permitted facility shall be liable for compliance with the terms of the permit. The permittee transferring the permit shall remain liable for corrective actions that may be required as a result of any violations occurring prior to the sale or legal transfer of the facility.
[Rule 62-4.120, F.A.C.]

9. Plant Operation-Problems. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its 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 Department rules.
[Rule 62-4.130, F.A.C.]

10. For purposes of notification to the Department pursuant to Rule 62-4.130, F.A.C., Plant Operation-Problems, "immediately" shall mean the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the incident, excluding weekends and holidays.
[40 CFR 70.6(a)(3)(iii)(B)]

11. **Not federally enforceable.** Review. Failure to request a hearing within 14 days of receipt of notice of proposed or final agency action on a permit application or as otherwise required in Chapter 62-103, F.A.C., shall be deemed a waiver of the right to an administrative hearing.
[Rule 62-4.150, F.A.C.]

12. Permit Conditions. All permits issued by the Department shall include the following general conditions:
(1) The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
(2) This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
(3) As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6000

GULF POWER
A SOUTHERN COMPANY

February 3, 1998

RECEIVED
FEB 06 1998
BUREAU OF
AIR REGULATION

Mr. Stanley J. Krivo
US EPA Region IV
61 Forsyth Street
Atlanta, GA 30303

Dear Mr. Krivo:

RE: PLANT SCHOLZ PRIME MODEL
DRAFT TITLE V PERMIT No: 0630014-001-AV

For the past few months, Florida Department of Environmental Protection (FDEP) has been evaluating the ground-level SO_2 impacts due to Plant Scholz, one of the Gulf Power Company's electric generating facilities located in the panhandle area of the state of Florida. The stack-building configuration of this power plant has a potential for building downwash effects.

The model being utilized for this application is the ISCST3 model. As it has been said time and again at various technical meetings, the understanding of atmospheric dispersion has considerably improved since this model was approved for regulatory use. For this reason, EPA has been developing the AERMOD model, which is expected to be released for public use in the near future.

As many have pointed out, the current version of ISCS3 does not reflect the state - of - the - science on building downwash, and has deficiencies in the treatment of the stack location, streamline deflection, wind angle, plume rise, atmospheric stability, etc. To quote Electric Power Research Institute (EPRI), "Plume downwash (stack-tip and building-induced) was incorporated in some EPA regulatory air quality models in 1979. Prior to adoption of the Industrial Source Complex (ISC) model, building downwash was either ignored or handled on a case-by-case basis. Little additional work has been devoted to this topic -- due more to the lack of good quality data from which to derive improvements, than from satisfaction with the scientific basis of the treatment, or with the overall accuracy."

Having identified these problems, EPRI, with the participation of EPA, embarked on an elaborate field and wind tunnel study to improve the understanding of the building downwash phenomenon. The outcome of this multi-year study is a model known as Plume RIse Model Enhancements (PRIME) that went through various stages of beta testing and has just completed an independent evaluation. The results of the evaluation indicate that the model-predicted concentrations are closer to those observed in the field and wind tunnel studies. EPRI made a presentation of this model at the EPA Region IV State/Local Modelers Workshop on November 18, 1997 in Atlanta. Further information on the model is available at www.epri.com/eg/PRIME.

A presentation of this model was made at the last EPA Regional Meteorologists' meeting and the model was received with enthusiasm. Mr. Joseph Tikvart of EPA has been informed about the progress of this model development since the beginning. Dr. William Snyder, Chief of the EPA's Fluid Modeling Facility, was on the technical advisory committee for the fluid modeling aspect of this project and provided EPA's Wind Tunnel and its personnel towards this project.

Recently, Golden Valley Electric Association (GVEA) submitted an application for air quality permit to Alaska Department of Environmental Conservation (ADEC). GVEA used the ISC-PRIME model, to aid in the estimation of the air quality impacts from the plant. GVEA has submitted a package of information to EPA Region X with a request for approval of the model. Hawaiian Electric Company is in the process of using this model to estimate the SO_2 impacts from an existing power plant. This company plans to submit an application for permit to Hawaii Department of Health.

On January 16, 1998, on behalf of the sponsors of the Plume Rise and Downwash Project Consortium, EPRI submitted the ISC-PRIME model to Mr. Tikvart for consideration to accept as an "Appendix A" regulatory model. As a part of this submittal, the model (source code as well as the executable), pertinent documentation of the model including results of the independent evaluation of the model, consequence analysis, etc. were included.. The electronic versions of these files were written to CD-ROM. We have enclosed with this letter, a copy of the CD and the cover letter to Mr. Tikvart for your review.

Gulf Power Company, through Southern Company Services (SCS), is one of the sponsors of the Plume Rise/Downwash project, and is pleased with the new model's ability to incorporate the latest science into the assessment of building downwash effects. Therefore, by this letter, Gulf Power Company requests EPA Region IV to approve the use of this technically superior downwash model for evaluating the SO_2 permit conditions for Plant Scholz. The current regulatory use of UAM-V in many areas reflects application of technically superior non-guideline models for evaluation purposes. Due to the short comment period associated with completion of the Title V permitting program, a quick response to this request would be appreciated.

If you have any questions or need additional information, please contact me at (850) 444-6527 or Stan Vasa at (205) 257-5455.

Sincerely,

G. Dwain Waters, QEP
Air Programs Coordinator

cc: James O. Vick, Gulf Power Company
Stan Vasa , Southern Company Services
Jonathan Holtom, Florida Department of Environmental Protection, TLHSE

January 16, 1998

Joseph Tikvart
US Environmental Protection Agency
Office of Air Quality Planning & Standards
MD-14
Research Triangle Park, NC 27711

Dear Mr. Tikvart,

On behalf of the utility sponsors of the Plume Rise and Downwash Modeling Project Consortium, EPRI is hereby submitting the ISC-PRIME model for EPA's consideration to classify as an "Appendix A" regulatory model. PRIME features a numerical plume rise scheme and a downwash approach that seamlessly estimates concentration within the building cavity, in the far wake region, as well as outside the structure's influence. When used as a module within a comprehensive dispersion model, we believe that PRIME's treatment of the plume rise and downwash phenomena exhibits better performance than existing algorithms. For this submittal, the PRIME algorithms have been incorporated into the latest version of the ISCST3 model to create ISC-PRIME. The ISC-PRIME model has undergone an extensive series of beta testing by the sponsors, as described in the Project Chronology report. The model has been independently evaluated against ISCST3 by ENSR Consulting & Engineering, as documented in their enclosed evaluation report.

Included as part of this submittal package are:

- Addendum to ISC3 User's Guide: The PRIME Plume Rise and Building Downwash Model (hardcopy/PDF file)
- Executable Code (electronic files)
- Test Input and Output Data (electronic files)
- Source Code (electronic files)
- Results of the Independent Evaluation of ISCST3 and ISC-PRIME Report (hardcopy/PDF file)
- Consequences Analysis for ISC-PRIME (hardcopy)
- Project Chronology, Exceptions Report, and Bibliography (hardcopy/PDF file)
- Two technical papers (by Lloyd Schulman et al., and Robert Paine et al.) presented at the Tenth Joint Conference on Applications of Air Pollution Meteorology in Phoenix, Arizona in January 1998 (hardcopy/PDF file). These papers describe, in a concise manner, the development of PRIME and the independent evaluation, respectively.

Voice: +1 (650) 855-2592 • **Fax:** +1 (650) 855-1069 • **Internet:** chakk@epri.com • www.epri.com
Address: 3412 Hillview Avenue, PO Box 10412, Palo Alto, CA 94303-0813 USA • +1(650)855-2000

The electronic files are written on the enclosed CD-ROM in ISO9660 format, compatible with most personal computers. Since we anticipate that the Agency might wish to make PRIME's supporting documents available for public review via the Internet, we are including electronic versions of the documents in Adobe Acrobat® PDF format. Unfortunately, the electronic versions do not contain some of the artwork (figures, pictures, etc.), so the reader will have to refer to the hardcopy for this supplemental information.

If you have any questions or require additional information on PRIME, please contact me at:

Dr. Chuck Hakkarinen
EPRI
3412 Hillview Avenue
P.O. Box 10412
Palo Alto, CA 94303-0813

phone: 1-650-855-2592
fax: 1-650-855-2950
email: chakk@epri.com

Sincerely yours,

Chuck Hakkarinen

Dr. Chuck Hakkarinen
Environment Group

HAKK/RHO:hakk

Enclosures

cc (w/enc): Plume Rise and Downwash Modeling Project Consortium members
Richard H. Osa, STMI

Phase II NOx Averaging Plan Checklist (40 CFR 76.11)

Source (Plant) Name: Gulf Power - Crist Smith Scholz	Date Compliance Plan Received:

Substantive Review

Checklist Items:		**Notes/Comments/Issues:**
STEP 1:		
(i) The plant name and State identified in the Phase II NOx Compliance Plan for the affected source are also identified in the Phase II NOx averaging plan.	☒ Yes ☐ No	
(ii) The boilers ID #'s for which row "j" has been checked in the Phase II NOx Compliance Plan for the affected source match the boiler ID #'s identified for the affected source in the averaging plan.	☐ Yes ☐ No	
(iii) The standard emission limitation entered at column "a" for each boiler at the affected source matches the standard emission limitation for that type of boiler in 40 CFR 76.5, 76.6, or 76.7 (early election units must enter the applicable emission limitation from 40 CFR 76.7) and with the standard limitation denoted for the boiler in Section 4 of the Acid Rain Permit Writer's Guide (including those units that are early election units or units that have, or are applying for, an alternative emission limitation).	☒ Yes ☐ No	

Phase II NOx Averaging Plan Checklist (40 CFR 76.11)

Source (Plant) Name:	Date Compliance Plan Received:

Checklist Items:		**Notes/Comments/Issues:**
STEP 1, cont'd.		
(iv) An alternative contemporaneous emissions limitation (ACEL) has been entered for each boiler in column "b," and that limitation has been rounded to the nearest hundredth (for example, 0.48 lb/mmBtu). For units that have also marked line "l" of the Phase II NOx Compliance plan, the same ACEL has been entered in column "b" of the averaging plan for each unit utilizing the same common stack.	☐ Yes ☒ No	
(v) A heat input limit has been entered for every unit listed at STEP 1.	☒ Yes ☐ No	

STEP 2:

Confirm that the numbers entered in the left and right boxes at STEP 2 have been calculated properly.

For the **left box**, calculate what the group NOx emission rate for the units would be if operated in accordance with the ACELs entered at column "b" by:

(1) For each unit, multiplying the emission limitation in column "b" times the annual heat input in column "c," and adding the resulting numbers.

(2) Adding all of the annual heat input figures in column "c."

(3) Divide the answer from number (1) above by the answer from number (2) above. The result should equal the figure entered in the **left box** at STEP 2.

Phase II NOx Averaging Plan Checklist (40 CFR 76.11)

Source (Plant) Name:	Date Compliance Plan Received:

STEP 2, cont'd.

Checklist Items:		**Notes/Comments/Issues:**
(i) Does the reviewer's calculation of the number in the **left box** at STEP 2 equal the number calculated and entered in the **left box** by the Designated Representative?	☐ Yes ☐ No	

For the **right box**, calculate what the group NOx emission rate for the units would be if operated in accordance with the emission limitations entered at column "a" by:

(1) For each unit, multiplying the emission limitation in column "a" times the annual heat input in column "c," and adding the resulting numbers.

(2) Adding all of the annual heat input figures in column "c."

(3) Divide the answer from number (1) above by the answer from number (2) above. The result should equal the figure entered in the **right box** at STEP 2.

(ii) Does the reviewer's calculation of the number in the **right box** at STEP 2 equal the number calculated and entered in the **right box** at STEP 2 by the Designated Representative?	☐ Yes ☐ No	
(iii) The number in the left box must be less than or equal to the number in the right box. Is the number in the **left box** at STEP 2 **less than or equal to** the number in the **right box** at STEP 2?	☐ Yes ☐ No	

Phase II NOx Averaging Plan Checklist (40 CFR 76.11)

Source (Plant) Name:	Date Compliance Plan Received:

Checklist Items:		**Notes/Comments/Issues:**
STEP 3:		
If one averaging plan is to be effective for more than one calendar year, a plan duration of not greater than 5 calendars years has been entered.	☐ Yes ☐ No	
If the averaging plan is to be treated as a number of identical plans effective for one year each, the number of identical plans entered matches the number of years entered for which the plans will be in effect.		
STEP 4:		
The designated representative (DR) or alternate designated representative (ADR) entered at this Step has been verified as the certified DR or ADR as of the date the Phase II NOx averaging plan was signed.	☐ Yes ☐ No	

Note: The valid DR for a submission can be identified by reviewing the state copy of the appropriate DR form for an affected source, through DR information available on the World Wide Web, or by contacting either the EPA Regional acid rain contact or Acid Rain Division at EPA Headquarters.

Southern Company Averaging Plan Participating Plants

Plant Name (from Step 1) as Listed in Step 1.

STEP 1
Continue the identification of units from Step 1, page 1, here.

Plant Name	State	ID #	(a) Emission Limitation	(b) Alt. Contemp. Emission Limitation	(c) Annual Heat Input Limit
Hammond 1 DBW	GA	1	0.50	0.827	4,539,663
Hammond 2 DBW	GA	2	0.50 ✓	0.827	6,333,156
Hammond 3 DBW	GA	3	0.50 ✓	0.827	6,439,818
Hammond 4 DBW	GA	4	0.50 ✓	0.454	26,126,591
Kraft 1 T	GA	1	0.45 ✓	0.580	2,974,849
Kraft 2 T	GA	2	0.45 ✓	0.580	2,238,703
Kraft 3 T	GA	3	0.45 ✓	0.580	3,971,009
L. Smith 1	FL	1	0.40	0.618	9,199,644
L. Smith 2 T	FL	2	0.40	0.436	10,154,723
McDonough 1 T	GA	1	0.45 ✓	0.420	18,934,013
McDonough 2 T	GA	2	0.45 ✓	0.420	17,338,565
McIntosh 1 DBW	GA	1	0.50 ✓	0.858	8,568,975
Miller 1 DBW	AL	1	0.46 ✓	0.293	53,814,591
Miller 2 DBW	AL	2	0.46 ✓	0.293	52,772,559
Miller 3 DBW	AL	3	0.46 ✓	0.293	49,093,163
Miller 4 DBW	AL	4	0.46 ✓	0.293	55,722,252
Mitchell 3 T	GA	3	0.45 ✓	0.615	5,322,072
Scherer 1 T	GA	1	0.40 ✓	0.500	52,573,864
Scherer 2 T	GA	2	0.40 ✓	0.500	55,563,600
Scherer 3 T	GA	3	0.45 ✓	0.295	37,912,770
Scherer 4 T	GA	4	0.40 ✓	0.300	70,093,731
Scholz 1 DBW	FL	1	0.50 ✓	0.682	1,855,434
Scholz 2 DBW	FL	2	0.50 ✓	0.774	1,864,795
Wansley 1 T	GA	1	0.45 ✓	0.413	53,141,279
Wansley 2 T	GA	2	0.45 ✓	0.421	49,741,786
Watson 4 DBW	MS	4	0.50 ✓	0.500	17,100,575
Watson 5 DBW	MS	5	0.50 ✓	0.647	33,455,317
Yates 1 T	GA	1	0.45 ✓	0.481	3,853,527
Yates 2 T	GA	2	0.45 ✓	0.481	4,687,321
Yates 3 T	GA	3	0.45 ✓	0.481	3,981,916
Yates 4 T	GA	4	0.45 ✓	0.396	7,087,706
Yates 5 T	GA	5	0.45 ✓	0.396	5,186,897
Yates 6 T	GA	6	0.45 ✓	0.328	13,373,298
Yates 7 T	GA	7	0.45 ✓	0.303	14,601,869

Southern Company Averaging Plan Participating Plants

Plant Name (from Step 1) **as Listed in Step 1.**

STEP 1
Continue the identification of units from Step 1, page 1, here.

Plant Name	State	ID #	(a) Emission Limitation	(b) Alt. Contemp. Emission Limitation	(c) Annual Heat Input Limit
Barry II T	AL	1	0.40 ✓	0.492	10,805,761
Barry II T	AL	2	0.40 ✓	0.492	10,643,159
Barry II T	AL	3	0.40 ✓	0.492	17,148,763
Barry II T	AL	4	0.40 ✓	0.374	25,471,720
Barry II T	AL	5	0.40 ✓	0.448	50,897,853
Bowen I T	GA	1	0.45 ✓	0.421	45,395,755
Bowen I T	GA	2	0.45 ✓	0.434	46,911,826
Bowen I T	GA	3	0.45 ✓	0.430	59,796,338
Bowen I T	GA	4	0.45 ✓	0.430	62,106,898
Hallee Branch - CB	GA	1	0.68 ✓	0.988	14,906,580
Branch I T	GA	2	0.50 ✓	0.717	16,571,123
Branch - CB	GA	3	0.68 ✓	0.842	27,015,768
Branch - CB	GA	4	0.68 ✓	0.842	28,967,878
Crist I T	FL	4	0.45 ✓	0.520	3,062,929
Crist I T	FL	5	0.45 ✓	0.599	4,850,348
Crist I DBW	FL	6	0.50 ✓	0.455	17,603,755
Crist I DBW	FL	7	0.50 ✓	0.448	32,267,381
Daniel I T	MS	1	0.45 ✓	0.281	28,010,957
Daniel I T	MS	2	0.45 ✓	0.265	29,025,313
Gadsden I T	AL	1	0.45 ✓	0.648	2,473,380
Gadsden I T	AL	2	0.45 ✓	0.684	2,333,659
Gaston I DBW	AL	1	0.50 ✓	0.433	15,666,430
Gaston I DBW	AL	2	0.50 ✓	0.433	15,642,121
Gaston I DBW	AL	3	0.50 ✓	0.427	16,016,613
Gaston I DBW	AL	4	0.50 ✓	0.427	15,780,983
Gaston I T	AL	5	0.45 ✓	0.422	43,137,116
Gorgas II DBW	AL	6	0.46 ✓	0.864	5,058,595
Gorgas II DBW	AL	7	0.46 ✓	0.864	5,052,447
Gorgas II T	AL	8	0.40 ✓	0.486	11,173,785
Gorgas II T	AL	9	0.40 ✓	0.303	10,939,664
Gorgas II T	AL	10	0.40 ✓	0.763	46,251,622
Greene Co CB	AL	1	0.68 ✓	0.977	19,524,675
Greene Co II DBW	AL	2	0.46 ✓	0.434	18,839,670

Jonathan Holtom Scott

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

Gulf Power Company
One Energy Place
Pensacola, FL 32520

/

OGC No. 97-1824

DRAFT Permit No.: 0330045-001-AV
Crist Plant
Escambia County

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 28-106.111(3) and 62-103.050(1), an extension of time, to and including December 31, 1997, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, Gulf states the following:

1. On or about October 6, 1997, Gulf received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0330045-001-AV) for the Crist Plant located in Escambia County, Florida. Along with the Intent to Issue, Gulf received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."

2. By order dated November 7, 1997, the Department granted an extension of time until November 14, 1997, within which to file a petition for an administrative hearing.

3. Based on Gulf's review, the draft permit and associated documents contain several provisions that warrant clarification or correction.

4. Representatives of Gulf have corresponded and intend to continue to correspond with staff of the Department's Bureau of Air Regulation in an effort to resolve all issues.

5. This request is filed simply as a protective measure to avoid waiver of Gulf's right to challenge certain conditions contained in the draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing.

6. Jeffrey Brown with the Department's Office of General Counsel has agreed to an extension until December 31, 1997 on behalf of the Department.

WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0330045-001-AV be formally extended to and including December 31, 1997.

Respectfully submitted this 14th day of November, 1997.

HOPPING GREEN SAMS & SMITH, P.A.

Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(904) 222-7500

Attorney for GULF POWER COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S. Mail on this 14th day of November, 1997:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Angela R. Morrison

100340

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6000

GULF POWER
A SOUTHERN COMPANY

November 12, 1997

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Dear Mr. Sheplak:

RE: PLANT CRIST TITLE V RESPONSIBLE OFFICIAL CHANGE:
DRAFT PERMIT No: 0330045-001-AV

Attached, please find Gulf Power's request change for "Responsible Official" regarding the Draft Title V Permit (0330045-001-AV) issued on September 30, 1997 for the Crist Electric Generating Plant.

If you have any questions or need further information regarding this request, please call me at (850) 444.6527.

Sincerely,

G. Dwain Waters, QEP
Air Quality Programs Coordinator,

cc: Robert G. Moore., Gulf Power Company
James O Vick, Gulf Power Company
J. W. Martin, Gulf Power Company
John Dominey, Gulf Power Company
Danny Herrin, Southern Company Services

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official :

Name : Robert G. Moore.
Title : V.P. Power Generation/Transmission

2. Owner or Authorized Representative or Responsible Official Mailing Address :

Organization/Firm : Gulf Power Company
Street Address : One Energy Place
City : Pensacola
State : FL Zip Code : 32520-0100

3. Owner/Authorized Representative or Responsible Official Telephone Numbers :

Telephone : (850)444-6383 Fax : (850)444-6744

4. Owner/Authorized Representative or Responsible Official Statement :

I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. 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. 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 any permitted emissions units.*

Robert G. Moore
Signature

10/15/97
Date

* Attach letter of authorization if not currently on file.

Date: 11/3/97 1:18:00 PM
From: GATES.KIM
Subject: Comments on Draft Permit for Gulf Power's Crist Plant
To: See Below

Our comments are attached in WordPerfect and MS Word files. Please let me know if you have problems downloading these files.

Kim
404/562-9124

The following is an attached File item from cc:Mail. It contains information which had to be encoded to insure successful transmission through various mail systems. To decode the file use the UUDECODE program.

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To: sheplak_s
CC: ADAMS.YOLANDA
CC: JACHIM.JENNY
CC: HAYNES.WILSON
CC: MCNEAL.DAVE
CC: PIERCE.CARLA

cc: ✓Jonathan
11/5 Bruce
Clair

ELECTRONIC TRANSMISSION

Date: November 3, 1997

To: Scott Sheplak, BAR, FDEP

From: Kim Gates, EPA Region 4

Subj: Informal Comments on Draft Title V Permit

Facility: Gulf Power's Crist Electric Generating Plant

Attached are informal comments from EPA Region 4's Utility Permits Review Team on the above referenced facility. Some of these comments may also apply to the draft permit for Gulf Power's Scholtz Plant.

Our concerns need to be resolved in order to avoid possible objections to the proposed permits. Please contact me at 404/562-9124 to set up a conference call to discuss our comments and your resolution.

Attachment

Comments Summary

Draft Permit (#0330045) for Gulf Power's Crist Plant

(Comment #)	Comments Made to the Permitting Authority	Resolution
1.LH	The heat inputs for Units 004 through 007 are not consistent between the statement of basis and the permit text. The statement of basis has 490.9, 421.6, 3368, and 5824 million BTU per hour respectively for these units. Pages 2, 23, 38, 39 and 61 of the permit list these as 1096.7, 1096.7, 3704.8, and 6406.4 million BTU per hour, respectively. Additionally, both Units 004 and 005 are designated as 'Boiler Number 4' in the statement of basis and in the brief description in Subsection B on Page 22 of the permit.	
2.LH	Sections B.3 and C.3 state that on-site generated oil contaminated soil is periodically burned for energy recovery purposes. Are there limits on the rate this 'fuel' can be burned? Because of the nature of soil, would there be any possibility that the particulate mass limit would be violated during firing? Condition C.3 also lists injection of ammonia and sulfur trioxide as supplemental injections. Does this supplemental injection apply to Units 006 and 007 or to just one of the units? The statement of basis should include this information and why this injection is needed. Are there record keeping requirements for both the above issues? What is the projected annual usage of SO3?	
3.LH	Sections C.7 and C.8: An annual maximum mass emission rate (tons per year) is specified for Unit 006. Are there a maximum tons per year for units 004, 005, 007? For Unit 006, 8760*0.1*3368=1475 tons. However, C.8 allows 0.3 for 3 hours each day. This would result in a calculation of 3368*0.3*3*365 + 3368*0.1*21*365=1844 tons.	
4.LH	Section IV, Acid Rain Part, A.2. The table shows for emission point 004, a jump to 25040 tons sulfur dioxide in 2001 and 2002 from 2446 tons sulfur dioxide for 2000. Coincidentally, the figure 25040 is the value in 40 CFR Part 73 for Crystal River unit 5.	

5.DM	A.14-5 and A.22. We are concerned about the lack of periodic monitoring provisions for particulate mass (PM) emissions and opacity for Units 1 through 3. The monitoring provisions in A.14-5 do not address PM and opacity periodic monitoring for Units 1 through 3, and according to the testing requirements in A.22, annual testing to verify compliance with PM and opacity limits is waived during any year in which liquid and/or solid fuels are burned for no more than 400 hours. If it is not necessary to conduct periodic monitoring to obtain the data used as the basis for the annual compliance certification, the statement of basis must be revised to explain the basis for this conclusion. In cases where a basis for waiving monitoring cannot be justified, an annual test alone will rarely be considered adequate periodic monitoring. Obviously, for periods of time when natural gas is combusted in Units 1 - 3, maintaining fuel usage records will constitute adequate periodic monitoring for both PM and opacity. In the case of fuel oil, however, the statement of basis must be revised to explain why no monitoring is necessary or adequate periodic monitoring provisions must be added to the permit. If a waiver of monitoring for the periods of time when oil is combusted is not justified in the statement of basis, the annual testing currently required in the permit must be supplemented with additional monitoring that can be used for certifying compliance with the PM and opacity limits. For the PM limit, Region 4 believes that keeping records to verify that the ash content of the oil combusted is consistent with that burned during tests conducted when compliance was demonstrated will be adequate. For the opacity standard, Region 4 believes that visible emissions data should be collected on at least a daily basis on the days during which oil is combusted. Unless a justification for waiving monitoring is provided in the statement of basis, Region 4 does not consider the number of hours during which oil is combusted to be a relevant factor to consider when deciding whether periodic monitoring is necessary when oil is combusted in Units 1 - 3. Gulf Power has an obligation to certify compliance with all applicable emission standards on an annual basis, and if no testing or monitoring is conducted, the company will not have any data to rely on as the basis for the certification of compliance with the PM and opacity limits for Units 1 - 3.
6.DM	The lack of a requirement for conducting periodic monitoring to obtain data that will be used as a basis for certifying compliance with the PM emission limit for the coal-fired units is unacceptable. Periodic monitoring for units that rely on the use of control equipment to comply with an applicable emission standard has been discussed by the Regional Title V Workgroup, and the consensus of the participating regions is that periodic stack testing alone does not constitute adequate periodic monitoring for such units. For units that rely on the use of control equipment to comply with an applicable PM emission standard, the consensus of the Title V Workgroup is that periodic monitoring tied to either control device operating parameters or to opacity is acceptable.
7.DM	Monitoring, Units 4-7 (Pages 25-26 for Units 4 and 5 and Pages 41- 42 for Units 6 and 7). Since certified opacity monitors are installed on Units 4 through 7, and since the permit indicates that these monitors will be used for determining compliance with the applicable opacity standard, a requirement to calibrate, operate, and maintain these monitors should be added to these sections of the permit.

8.JJ	Condition A.14 establishes that compliance with the liquid sulfur limit will be verified by fuel analysis provided by the vendor upon each fuel delivery. Condition A.30 establishes the requirement that the owner or operator maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. It is unclear as to whether or not the "on specification" fuel oil is included in the fuel being supplied by an outside source providing vendor verification of the sulfur content (as required by Condition A.14) . If the used oil is not being supplied by the outside vendor, it is unclear how the owner or operator is to monitor the sulfur content of the oil. Condition A.34 establishes that the owner or operator must sample and analyze each batch of used oil to be burned for arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs, however, there does not appear to be any requirement that the owner or operator sample or analyze the "on specification" fuel oil for sulfur content.

V:\comments\epa\crist pt.wrd

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6000

GULF POWER
A SOUTHERN COMPANY

October 28, 1997

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Dear Mr. Sheplak:

RE: PLANT CRIST TITLE V PERMIT COMMENTS:
DRAFT PERMIT No: 0330045-001-AV

Attached, please find Gulf Power's comments regarding the Draft Title V Permit (0330045-001-AV) issued on September 30, 1997 for the Crist Electric Generating Plant.

Please note that there has been an address change for Gulf Power Corporate Office to "One Energy Place, Pensacola, Fl 32520-0328" and the area code for all of Gulf Power locations has changed to (850). In addition to the area code change, Plant Crist has had a telephone number change to 850.429.5900. Please made these changes to your telephone directory for Gulf Power.

If you have any questions or need further information regarding our draft Title V permit comments, please call me at (850) 444.6527.

Sincerely,

G. Dwain Waters
Air Quality Programs Coordinator, QEP

cc: Robert G. Moore., Gulf Power Company
James O Vick, Gulf Power Company
J. W. Martin, Gulf Power Company
John Dominey, Gulf Power Company
Danny Herrin, Southern Company Services

PLANT CRIST TITLE V DRAFT PERMIT COMMENTS: 10/24/97

SECTION I
Subsection A:

Page 2 Facility Description. In the third paragraph, it should be added that the permitting notes are not "enforceable" permit conditions to help clarify that not only is the purpose informational only, but that the notes are not intended to be enforced.

SECTION II
Facility-wide Conditions

Page 4 Condition 8. Reasonable Precautions to Prevent Unconfined Particulate Matter.

General Comment: At a meeting with the FCG, Department representatives agreed to add a permitting note to conditions such as this one stating that this more specific condition implements and effectively supersedes Condition 57 under Attachment TV-1 (the general, canned conditions) which is basically a quote from Rule 62-296.320(4)(c), F.A.C.

SECTION III
Subsection A:

Page 9 A 1. Permitted Capacity Lists permitted capacities of emissions unit numbers 001, 002 and 003.

Comment: Add notation that permitted capacity can not be accurately monitored or determined by use of continuous emission monitoring systems installed or operated pursuant to 40 CFR Part 75.

Page 9 A.4 Hours of Operation. Requires Units 1-2-3 to maintain an operations log available for Department inspection that documents the total hours of annual operation, including a detailed account of hours operated on each of the allowable fuels. 62-213.440 and 62-210.200(PTE).

Comment: Unit(s) should not be required to have a continuous log of operations. Requirement does not note if this is a daily, hourly, monthly or annual log. Compliance to applicable standards are through vendor fuel oil analysis or generally exempt from annual visible emissions and particulate testing by operating less than 400 hour per year on fuel oil. The current reporting under the AOR is all that should be required.

Page 10 A. 10. Sulfur Dioxide - Sulfur Content. Outlines compliance method for liquid fuel.

Comment: Can not determine applicability of rule cite 62-213.440, F.A.C. The correct citation should be the applicant's request, rather than Rule 21-213.440, F.A.C.

Page 11 Monitoring of Operations. Permitting note stating that these units (Crist 1-2-3) meet Acid Rain Phase II requirements having continuous emission monitors installed for NOx, CO2 and stack gas flow.

Comment: Crist 1-2-3 meet Acid Rain Phase II 40 CFR Part 75 CEMs rules by Appendix D methods for SO2 and flow. Nox emissions monitored by use of a continuous emission monitor.

Page 11 A.15 Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter and SO2 is an annual 3 run hourly test. It should be noted that heat input (mmbtu/hr) for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/mmbtu) can be determined by the F-factor method as outlined in A.19 during this test. SO2 process variables are determined by vendor fuel analysis.

Page 11 A.15 Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated , 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)

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO2 compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing.

Page 13 A.22 Frequency of Compliance Test. (a) General Compliance Testing. 2. Requires annual particulate test for units that soot blow during normal unit operation, except for fossil fuel steam generators that do not burn liquid and/or solid fuel for more than 400 hours other than startup.

Comment: Add other than startup or shutdown operations.

Page 13 A.22 Frequency of Compliance Test. (a) General Compliance Testing. 3. Requires submission of emission compliance test results for any emissions unit that , during the year prior to renewal: b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.

Comment: Add other than during startup/shutdown. Also, the Department should add at the beginning of the sentence: "Except as otherwise provided in this permit..." See similar language in rule.

Page 13. A.22 Frequency of Compliance Test. (a) General Compliance Testing. 4. Requires a formal compliance test for a. Visible emissions, if there is an applicable standard.

Comment: Add reference to FCG exemption letter dated January 28, 1997 noting no visible emissions tests are required for units that burned liquid and/or solid fuel for a total of no more than 400 hours other than during startup/shutdown.

Page 14 A.22 Frequency of Compliance Test. (a) General Compliance Testing. 5. Requires an annual compliance test for particulate matter emissions for any fuel burning emissions unit that does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.

Comment: Add other than during startup or shutdown.

Page 18 A.27. Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter and SO2 is an annual 3 run hourly test. It should be noted that heat input (mmbtu/hr) for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/mmbtu) can be determined by the F-factor method as outlined in A.19 during this test. SO2 process variables are determined by vendor fuel analysis. **Same comment as A.15 above. Delete Condition A.27(a) Required Equipment**.

Page 18 A.27 Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated , 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)

Comment:. Does not specify how often this equipment should be checked or calibrated. Equipment used for SO2 compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing. **Same comment as item A.15 above. Delete Condition A.27 (b) Accuracy of Equipment.**

Page 18 A.28. Visible Emissions Testing - Annual. Requires annual emissions compliance testing for visible emissions unless these units burn. b. gaseous fuels in combination with any amount of liquid fuel for less than 400 hours per year. Rule 62-297.310(7)(a)4.

Comment: Add other than during startup and shutdown per year.

Page 18. A.28. Visible Emissions Testing - Annual. Requires annual emissions compliance testing for visible emissions unless these units burn c. only liquid fuel(s) for less than 400 hours per year. Rule 62-297.310(7)(a)4

Comment: Add other than during startup and shutdown per year.

Page 18 A.29. Particulate Matter Testing - Annual and Permit Renewal. Requires annual and permit renewal emissions compliance testing for particulate matter unless these units burn. b. gaseous fuels in combination with any amount of liquid fuel for less than 400 hours per year. Rule 62-297.310(7)(a)3.&5.

Comment: Add other than during startup and shutdown per year.

Page 18. A.29. Particulate Matter Testing - Annual and Permit Renewal. Requires annual emissions and permit renewal emissions compliance testing for particulate matter unless these units burn c. only liquid fuel(s) for less than 400 hours per year. Rule 62-297.310(7)(a)3.&5. and ASP # 97-B-01.

Comment: Add other than during startup and shutdown per year.

Page 18 A.30. Recordkeeping and Reporting Requirements. Requires owner or operator to maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. Rule 62-214.440 and 62-4.070(3) F.A.C.

Comments: Unit(s) should not be required to maintain continuous records of fuel consumption if the unit accepts a percent sulfur restriction for sulfur dioxide compliance for liquid fuels or burns gas. Liquid fuel is monitored by as-received vendor fuel analysis. See condition A.20. Only annual reporting under the Annual Operating Report should be required.

Page 18 A.31. Recordkeeping and Reporting Outline notification and reporting requirements in case of excess emissions resulting from malfunctions.

Comment: It should be noted that notification to the Department is required after the two hour daily exemption has occurred and not from any malfunction.

Page 20 A.34. e Testing Requirements: Outline testing requirements for used oil.

Comment: Used oil for which the operator has generator knowledge having no possibility of contamination by PCB should not be required to test for PCBs.

Page 21 A.34. f RecordKeeping Requirements: The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (1): Condition requires the source to maintain records of quantities of used oil generated that is transferred into the approved AST (above ground storage tank) at the source.

Comments: Current procedures allow the AST to be batch-tested once it is filled and that quantity burned. It is overly burdensome to maintain records of each volume of oil added to the AST during any period. Additionally, there is no regulatory requirement for records to be completed by any specified date, particularly arbitrarily derived dates.

Page 21 A.34. f. RecordKeeping Requirements The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (2): Requires records of used oil management to completed by no later than the fifteenth day of the succeeding month.

Comment: There is no regulatory requirement for any specified date for record keeping completion purposes. The Department's language in this part of the proposed condition regarding consecutive 12 month periods is not consistent with earlier provisions which talk about a calendar year limitation on the total quantity of used oil that can be burned. Delete this requirement.

Page 21 A.34. g. Reporting Requirements. Requires the source to report to the Northwest District office within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

Comment: There is no current regulatory requirement for quarterly reporting of used oil activities to the District. Current reporting though the Annual Operating Reporting should be adequate to meet monitoring of on-specification used oil activities.

NOTE: Cite [40 CFR 761.20(e)] is not applicable to these conditions; this cite addresses marking requirements for PCB containers.

Subsection B:

Page 22. B.1 Permitted Capacity. Lists permitted capacities of emissions unit numbers 004 and 005.

Comment: Add notation that permitted capacity can not be accurately monitored or determined by use of continuous emission monitoring systems installed or operated pursuant to 40 CFR Part 75.

Page 23 B.4 Hours of Operation. Requires Units 4 & 5 to maintain an operations log available for Department inspection that documents the total hours of annual operation, including a detailed account of hours operated on each of the allowable fuels. 62-213.440 and 62-210.200(PTE).

Comment: Unit(s) should not have to keep a continuous log of operations. Requirement does not note if this is a daily, hourly, monthly or annual log. These units maintain compliance to SO2 standards through CEMS. The current reporting under the AOR is all that should be required.

Page 25 B.17 Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter is an annual 3 run hourly test and SO2 is a 24 hour daily average using CEMS data. It should be noted that heat input for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/mmbtu) can be determined by the F-factor method outlined in B.21. during the test. Daily (24 hour) SO2 emission rates shall be determined by CEM monitors on a real time basis outlined in B.23.

Page 25 B.17 Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated , 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)

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO2 compliance has QA/QC procedures associated with the acid rain program and meet QC provisions in B.23. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing.

Page 25 B.18 Annual Tests Required. Requires annual tests for SO2 and PM.

Comment: Annual testing for SO2 should not be required sinces CEMs are used for compliance.

Page 25 B.19. Visible Emissions Notes permittee has elected to utilize a transmissometer (opacity meter) for demonstrating compliance with the visible emissions limit.

Comment: Gulf Power's continuous emission monitors for opacity only records and reports opacity in block 6 minute intervals.

Page 27 B.23. Monitoring of Operations. Requires continuous SO2 emission monitoring using 24 hour averages with standards of the Department (See Specific Condition 4)

Comment: Specific Condition 4 is Hours of Operation. The correct reference should be Specific Condition B.9 Sulfur Dioxide - Solid Fuel and B.10 Sulfur Dioxide - Liquid Fuel. Also, Delete "immediately initiate as-fired fuel sampling" to language outlined in the existing permit, i.e. 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.

Page 27 B.25. Fuel Sampling and Analysis. Outline various ASTM procedures for use to demonstrate compliance with the sulfur dioxide standard in the event that the SO2 CEM is not able to capture valid data.

Comment: Section (a) and (c) should be deleted and replaced with the provision that the source has accepted a sulfur percent limit for fuel oil and that limit will be verified with a fuel analysis provided by the vendor upon each fuel delivery. Additionally, references to the density of the fuel oil in Section (e) should be deleted. Added to Section (f), it should be noted that if fuel oil is consumed during a day when these procedures are used that the latest fuel oil analysis will be used to calculate the SO2 emission rate.

Page 30 B.29. Operating Rate During Testing. Outlines that testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.

Comment: Since capacity is defined as heat input in MMBTU/hour. Specific reference needs to be made that heat input shall be determined by fuel consumption calculations from data collected and analyzed during the reference tests and averaged over the test runs. If fuel consumption data is not available, then the source may select to use data calculated from EPA Reference Method 2 & 3 collected during the reference tests and averaged over the tests.

Page 32. B.31. Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter is an annual 3 run hourly test and SO2 is a 24 hour daily average using CEMS data. It should be noted that heat input for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/mmbtu) can be determined by the F-factor method outlined in B.21. during the test. Daily (24 hour) SO2 emission rates shall be determined by CEM monitors on a real time basis outlined in B.23 **See B. 17 for the same comments. Delete Condition B.31(a) Required Equipment.**

Page 32 B. 31. Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated , 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)

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO2 compliance has QA/QC procedures associated with the acid rain program. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing. **See B.17 for the same comments. Delete Condition B.31(b) Accuracy of Equipment.**

Page 32 B.32. Recordkeeping and Reporting Requirements. Requires owner or operator to maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. Rule 62-214.440 and 62-4.070(3) F.A.C.

Comments: Unit(s) should not have to maintain continuous records of fuel consumption if the unit accepts continuous emissions monitoring as a compliance method and accepts a percent sulfur restriction for sulfur dioxide compliance for liquid fuels and burns gas. Liquid fuel is monitored by as-received vendor fuel analysis. See condition A.20. Only annual reporting under the Annual Operating Report should be required.

Page 32 B.33. Recordkeeping and Reporting Outline notification and reporting requirements in case of excess emissions resulting from malfunctions.

Comment: It should be noted that notification to the Department is required after the two hour daily exemption has occurred and not from any malfunction.

Page 35 B.37. e. Testing Requirements: Outline testing requirements for used oil.

Comment: Used oil for which the operator has generator knowledge having no possibility of contamination by PCB should not be required to test for PCBs.

Page 35 B.37. f. RecordKeeping Requirements: The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (1): Condition requires the source to maintain records of quantities of used oil generated that is transferred into the approved AST (above ground storage tank) at the source.

Comments: Current procedures allow the AST to be batch-tested once it is filled and that quantity burned. It is overly burdensome to maintain records of each volume of oil added to the AST during any period. Additionally, there is no regulatory requirement for records to be completed by any specified date, particularly arbitrarily derived dates.

Page 35 B.37. f. RecordKeeping Requirements The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP(Best Management Practices). (2): Requires records of used oil management to completed by no later than the fifteenth day of the succeeding month.

Comment: There is no regulatory requirement for any specified date for record keeping completion purposes. The Department's language in this part of the proposed condition regarding consecutive 12 month periods is not consistent with earlier provisions which talk about a calendar year limitation on the total quantity of used oil that can be burned. Delete this requirement.

Page 35 B.37. g. Reporting Requirements. Requires the source to report to the Northwest District office within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

Comment: There is no current regulatory requirement for quarterly reporting of used oil activities to the District. Current reporting though the Annual Operating Reporting should be adequate to meet monitoring of on-specification used oil activities.

NOTE: Cite [40 CFR 761.20(e)] is not applicable to these conditions; this cite addresses marking requirements for PCB containers.

Subsection C:

Page 36 Description of Emission Units Crist 6 & 7.

Comments: Description makes note of NOx emissions from unit -007 are controlled by Foster Wheeler Low NOx Burners. Crist Unit 006 has the same control system without reference in the description. Add Crist 006 to the reference.

Page 36 C.1. Permitted Capacity Lists permitted capacities of emissions unit numbers 006 and 007.

Comment: Add notation that permitted capacity can not be accurately monitored or determined by use of continuous emission monitoring systems installed or operated pursuant to 40 CFR Part 75.

Page 37 C.4 Hours of Operation. Requires Units 6 & 7 to maintain an operations log available for Department inspection that documents the total hours of annual operation, including a detailed account of hours operated on each of the allowable fuels. 62-213.440 and 62-210.200(PTE).

Comment: Unit(s) should not have to keep a continuous log of operations. Requirement does not note if this is a daily, hourly, monthly or annual log. These units maintain compliance to SO2 standards through CEMS. The current reporting under the AOR is all that should be required.

Page 37 C.7. Particulate Matter. Requires particulate matter from unit 6 shall not exceed 1,475 tons/year.

Comment: Calculation in error; The correct particulate matter limit per year for Crist 6 should be 1,622.7 tons/year. This should not be a specific condition, perhaps a non-enforceable permitting note. The Department rule cite does not require an annual mass particulate emission limitation. This information was originally listed in the Unit 6 ESP Construction Permit for information only.

Page 38 C.9. Sulfur Dioxide - Solid Fuel. Requires sulfur dioxide emissions to be limited to 87,035 tons/year for Crist 6.

Comment: Calculation in error; The correct sulfur dioxide limit per year for Crist 6 should be 95,739 tons/year. This should not be a specific condition, perhaps a non-enforceable permitting note. The Department rule cite does not require an annual SO2 emission limitation. This information was originally listed in the Unit 6 ESP Construction Permit for information only.

Page 39. C.17. Determination of Process Variables (a) Required Equipment. Requires unit to install, operate and maintain equipment or instruments necessary to determine process variables as heat input when such data is needed in conjunction with emissions data to determine compliance with applicable emission limiting standards. Rule 62-297.310(5)

Comment: It is unclear if this requirement applies only to the demonstration period of compliance which for particulate matter is an annual 3 run hourly test and SO2 is a 24 hour daily average using CEMS data. It should be noted that heat input for capacity purposes should be determined by fuel sampling and analysis methods during annual particulate compliance testing. The annual particulate emission rate (lbs/mbtu) can be determined by the F-factor method outlined in C. 21 during the test. Daily (24 hour) SO2 emission rates shall be determined by CEM monitors on a real time 24 hour basis as outlined in C.23.

Page 39 C. 17. Determination of Process Variables (b) Accuracy of Equipment. Requires equipment and instruments noted in (a) above to be operated , 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)

Comment: Does not specify how often this equipment should be checked or calibrated. Equipment used for SO2 compliance has QA/QC procedures associated with the acid rain program and meet QC provisions in C23. Equipment associated with determination of capacity and/or heat input during particulate emissions particulate testing will be maintained within the designated accuracy range during the testing period. This requirement applies to equipment used during compliance testing.

Page 39 C.18. Annual Tests Required . Requires annual tests for SO2 and PM emissions in accordance with listed requirements.

Comments: Unclear on how compliance is determined for SO2. Addition should be made to this section noting SO2 compliance is determined by CEMs as outlined in section C.23. (See similar language used under visible emissions in section C.19)

Page 39 C.19. Visible Emissions Notes permittee has elected to utilize a transmissometer (opacity meter) for demonstrating compliance with the visible emissions limit.

Comment: Gulf Power's continuous emission monitors for opacity only records and reports opacity in block 6 minute intervals.

Page 41 C.23. Monitoring of Operations. Requires continuous SO2 emission monitoring using 24 hour averages with standards of the Department (See Specific Condition 4)

Comment: Specific Condition 4 is Hours of Operation. The correct reference should be Specific Condition C.9 Sulfur Dioxide - Solid Fuel and C.10 Sulfur Dioxide - Liquid Fuel. Also, Delete "immediately initiate as-fired fuel sampling" to language outlined in the existing permit, i.e. 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.

Page 41 C.25. Fuel Sampling and Analysis. Outline various ASTM procedures for use to demonstrate compliance with the sulfur dioxide standard in the event that the SO2 CEM is not able to capture valid data.

Comment: Section (a) and (c) should be deleted and replaced with the provision that the source has accepted a sulfur percent limit for fuel oil and that limit will be verified with a fuel analysis provided by the vendor upon each fuel delivery. Additionally, references to the density of the fuel oil in Section (e) should be deleted. Added to Section (f), it should be noted that if fuel oil is consumed during a day when these procedures are used that the latest fuel oil vendor analysis will be used to calculate the SO2 emission rate.

Page 44 C.29. Operating Rate During Testing. Outlines that testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.

Comment: Since capacity is defined as heat input in mmbtu/hour. Specific reference needs to be made that heat input shall be determined by fuel consumption calculations from data collected and analyzed during the reference tests and averaged over the test runs. If fuel consumption data is not available, then the source may select to use data calculated from EPA Reference Method 2 & 3 collected during the reference tests and averaged.

Page 46 C.32. Recordkeeping and Reporting Requirements. Requires owner or operator to maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. Rule 62-214.440 and 62-4.070(3) F.A.C.

Comments: Unit(s) should not have to maintain continuous records of fuel consumption if the unit accepts continuous emissions monitoring as a compliance method and accepts a percent sulfur restriction for sulfur dioxide compliance for liquid fuels and burns gas. Liquid fuel is monitor though as-received fuel analysis. See condition A.20. Only annual reporting under the Annual Operating Report should be required.

Page 46 C.33. Recordkeeping and Reporting Outline notification and reporting requirements in case of excess emissions resulting from malfunctions.

Comment: It should be noted that notification to the Department is required after the two hour daily exemption has occurred and not from any malfunction.

Page 48 C.37. e. Testing Requirements: Outline testing requirements for used oil.

Comment: Used oil for which the operator has generator knowledge having no possibility of contamination by PCB should not be required to test for PCBs.

Page 48 C.37. f. RecordKeeping Requirements: The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (1): Condition requires the source to maintain records of quantities of used oil generated that is transferred into the approved AST(above ground storage tank) at the source.

Comments: Current procedures allow the AST (above ground storage tank) to be batch-tested once it is filled and that quantity burned. It is overly burdensome to maintain records of each volume of oil added to the AST during any period. Additionally, there is no regulatory requirement for records to be completed by any specified date, particularly arbitrarily derived dates.

Page 46 C.37. f. RecordKeeping Requirements The general condition pertaining to the use of a used oil form for record keeping purposes, although not a specific regulatory requirement, should nonetheless be implemented as it is to be considered a BMP (Best Management Practices). (2): Requires records of used oil management to completed by no later than the fifteenth day of the succeeding month.

Comment: There is no regulatory requirement for any specified date for record keeping completion purposes. The Department's language in this part of the proposed condition regarding consecutive 12 month periods is not consistent with earlier provisions which talk about a calendar year limitation on the total quantity of used oil that can be burned. Delete this requirement.

Page 46 C.37. g. Reporting Requirements. Requires the source to report to the Northwest District office within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

Comment: There is no current regulatory requirement for quarterly reporting of used oil activities to the District. Current reporting though the Annual Operating Reporting should be adequate to meet monitoring of on-specification used oil activities.

NOTE: Cite [40 CFR 761.20(e)] is not applicable to these conditions; this cite addresses marking requirements for PCB containers.

Subsection D:

Page 52 D.12. Recordkeeping and Reporting Outline notification and reporting requirements in case of excess emissions resulting from malfunctions.

Comment: It should be noted that notification to the Department is required after the two hour daily exemption has occurred and not from any malfunction.

SECTION IV ACID RAIN PART:

Page 55 EU-004. Outlines SO2 Allowances for years 2000, 2001, 2202.

Comments: Error in SO2 Allowances for years 2001 and 2002. The correct value should be 2446.

Page 56 A.4 Comments, notes and justifications. Notes Designated Representative history.

Comments: Add most recent change from G. Edison Holland, Jr. to Robert G. Moore. Additionally, it should be noted that this specific condition should be changed to an unenforceable "permitting note" since this information can and will change frequently with appropriate notice.

APPENDIX E-1

General Comment: Many of the list of trivial or insignificant activities noted under the facility section and the applicant's "Emissions Unit 10" outlined in the Crist Title V Application were not included in the final permit. Gulf Power assumes that these activities and units not listed in the permit were determined to be either exempt or unregulated as "Trivial" by the Department's guidance memorandum dated March 15, 1996 or agreed to by the Department as case by case trivial activities requiring no permitting action.

APPENDIX U-1

General Comment: Fugitive PM emissions from Sandblasting are not listed as an unregulated emissions as outlined in the Crist Title V Application under Emissions Unit 10. Addition of this activity is requested.

TABLE 1-1

Comment: See attached Table 1-1 for corrections.

TABLE 2-1

Comment: See attached Table 2-1 for corrections.

Table 1-1, Summary of Air Pollutant Standards and Terms

Gulf Power Company
Crist Generating Plant

DRAFT Permit No.: 0330045-001-AV
Facility ID No.: 0330045

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of the permit.

E. U. ID No.	Brief Description	Pollutant Name	Fuel(s)	Hours/ Year	Allowable Emissions Standard(s)	Allowable Emissions lbs./hour	Allowable Emissions TPY	Equivalent Emissions* lbs./hour	Equivalent Emissions* TPY	Regulatory Citation(s)	See Permit Condition(s)
-001	Boiler #1	VE	Natural Gas	8,760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5.
	(320 MMBtu/hour -N.G.)		Fuel Oil	8,760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5.
	(320 MMBtu/hour -Oil)	PM	Natural Gas	8,760	0.1 lb/MMBtu	N/A	N/A	32.0	140.2	62-296.405(1)(b)	A.7.
			Fuel Oil	8,760	0.1 lb/MMBtu	N/A	N/A	32.0	140.2	62-296.405(1)(b)	A.7.
		PM - SB **	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	96.0	52.6 ~~175.2~~	62-210.700(3)	A.8.
	-Acid Rain Phase II Unit		Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	96.0	52.6 ~~175.2~~	62-210.700(3)	A.8.
		SO_2	Natural Gas	8,760	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			Fuel Oil	8,760	1.98 lb/MMBtu	N/A	N/A	633.6	2,775.2	62-296.405(1)(c)1.e.	A.9.
-002	Boiler #2	VE	Natural Gas	8,760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5.
	(320 MMBtu/hour -N.G.)		Fuel Oil	8,760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5.
	(320 MMBtu/hour -Oil)	PM	Natural Gas	8,760	0.1 lb/MMBtu	N/A	N/A	32.0	140.2	62-296.405(1)(b)	A.7.
			Fuel Oil	8,760	0.1 lb/MMBtu	N/A	N/A	32.0	140.2	62-296.405(1)(b)	A.7.
		PM - SB **	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	96.0	52.6 ~~175.2~~	62-210.700(3)	A.8.
	-Acid Rain Phase II Unit		Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	96.0	52.6 ~~175.2~~	62-210.700(3)	A.8.
		SO_2	Natural Gas	8,760	N/A 1.98 lb/mmBtu	N/A	N/A	N/A	N/A	N/A	N/A
			Fuel Oil	8,760	~~0.5% Sulfur~~	N/A	N/A	633.6	2,775.2	62-296.405(1)(c)1.e.	A.9.
-003	Boiler #3	VE	Natural Gas	8,760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5.
	(550 MMBtu/hour -N.G.)		Fuel Oil	8,760	20%; 40% - 1 two min. period/hr.			N/A	N/A	62-296.405(1)(a)	A.5.
	(550 MMBtu/hour -Oil)	PM	Natural Gas	8,760	0.1 lb/MMBtu	N/A	N/A	55.0	240.9	62-296.405(1)(b)	A.7.
			Fuel Oil	8,760	0.1 lb/MMBtu	N/A	N/A	55.0	240.9	62-296.405(1)(b)	A.7.
		PM - SB **	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	165.0	90.3 ~~301.1~~	62-210.700(3)	A.8.
	-Acid Rain Phase II Unit		Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	165.0	90.3 ~~301.1~~	62-210.700(3)	A.8.
		SO_2	Natural Gas	8,760	N/A 1.98 lb/mmBtu	N/A	N/A	N/A 1089	N/A 4,776.8	N/A	N/A
			Fuel Oil	8,760	~~0.5% Sulfur~~	N/A	N/A	~~633.6~~	~~2,775.2~~	62-296.405(1)(c)1.e.	A.9.

Table 1-1, Summary of Air Pollutant Standards and Terms

Gulf Power Company
Crist Generating Plant

DRAFT Permit No.: 0330045-001-AV
Facility ID No.: 0330045

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of the permit.

E. U. ID No.	Brief Description	Pollutant Name	Fuel(s)	Hours/ Year	Allowable Emissions Standard(s)	Allowable Emissions lbs./hour	Allowable Emissions TPY	Equivalent Emissions* lbs./hour	Equivalent Emissions* TPY	Regulatory Citation(s)	See Permit Condition(s)
-004	Boiler #4	VE	Coal	8,760	40%			N/A	N/A	62-296.405(1)(a)	B.5.
	(1,096.7 MMBtu/hour - Coal)		Natural Gas	8,760	40%			N/A	N/A	62-296.405(1)(a)	B.5.
	(1,096.7 MMBtu/hour - N.G.)		Fuel Oil	8,760	40%			N/A	N/A	62-296.405(1)(a)	B.5.
	(1,096.7 MMBtu/hour - Oil)	PM	Coal	8,760	0.1 lb/MMBtu	N/A	N/A	109.7	480.4	62-296.405(1)(b)	B.7.
			Natural Gas	8,760	0.1 lb/MMBtu	N/A	N/A	109.7	480.4	62-296.405(1)(b)	B.7.
			Fuel Oil	8,760	0.1 lb/MMBtu	N/A	N/A	109.7	480.4	62-296.405(1)(b)	B.7.
		PM - SB	Coal	3 hr/day	0.3 lb/MMBtu	N/A	N/A	329.0	~~600.4~~ 180.1	62-210.700(3)	B.8.
			Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	329.0	~~600.4~~ 180.1	62-210.700(3)	B.8.
	-Substitution Phase I		Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	329.0	~~600.4~~ 180.1	62-210.700(3)	B.8.
	Acid Rain Unit	SO_2	Coal	8,760	5.90 lb/MMBtu	N/A	N/A	6,470.5	28,340.9	62-296.405(1)(c)2.c.	B.9.
			Natural Gas	8,760	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			Fuel Oil	8,760	2.75 lb/MMBtu	N/A	N/A	3,015.9	13,209.8	62-296.405(1)(c)1.j.	B.10.
-005	Boiler #5	VE	Coal	8,760	40%			N/A	N/A	62-296.405(1)(a)	B.5.
	(1,096.7 MMBtu/hour - Coal)		Natural Gas	8,760	40%			N/A	N/A	62-296.405(1)(a)	B.5.
	(1,096.7 MMBtu/hour - N.G.)		Fuel Oil	8,760	40%			N/A	N/A	62-296.405(1)(a)	B.5.
	(1,096.7 MMBtu/hour - Oil)	PM	Coal	8,760	0.1 lb/MMBtu	N/A	N/A	109.7	480.4	62-296.405(1)(b)	B.7.
			Natural Gas	8,760	0.1 lb/MMBtu	N/A	N/A	109.7	480.4	62-296.405(1)(b)	B.7.
			Fuel Oil	8,760	0.1 lb/MMBtu	N/A	N/A	109.7	480.4	62-296.405(1)(b)	B.7.
		PM - SB	Coal	3 hr/day	0.3 lb/MMBtu	N/A	N/A	329.0	~~600.4~~ 180.1	62-210.700(3)	B.8.
			Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	329.0	~~600.4~~ 180.1	62-210.700(3)	B.8.
	-Substitution Phase I		Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	329.0	~~600.4~~ 180.1	62-210.700(3)	B.8.
	Acid Rain Unit	SO_2	Coal	8,760	5.90 lb/MMBtu	N/A	N/A	6,470.5	28,340.9	62-296.405(1)(c)2.c.	B.9.
			Natural Gas	8,760	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			Fuel Oil	8,760	2.75 lb/MMBtu	N/A	N/A	3,015.9	13,209.8	62-296.405(1)(c)1.j.	B.10.

Table 1-1, Summary of Air Pollutant Standards and Terms

Gulf Power Company
Crist Generating Plant

DRAFT Permit No.: 0330045-001-AV
Facility ID No.: 0330045

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of the permit.

E. U. ID No.	Brief Description	Pollutant Name	Fuel(s)	Hours/ Year	Allowable Emissions Standard(s)	Allowable Emissions lbs./hour	Allowable Emissions TPY	Equivalent Emissions* lbs./hour	Equivalent Emissions* TPY	Regulatory Citation(s)	See Permit Condition(s)
-006	Boiler #6	VE	Coal	8,760	40%			N/A	N/A	62-296.405(1)(a)	C.5.
	(3,704.8 MMBtu/hour - Coal)		Natural Gas	8,760	40%			N/A	N/A	62-296.405(1)(a)	C.5.
	(3,704.8 MMBtu/hour - N.G.)		Fuel Oil	8,760	40%			N/A	N/A	62-296.405(1)(a)	C.5.
	(714.8 MMBtu/hour - Oil)	PM	Coal	8,760	0.1 lb/MMBtu	N/A	~~1,475~~ 1422.7	370.5	~~1,475.0~~ 1422.7	62-296.405(1)(b)	C.7.
			Natural Gas	8,760	0.1 lb/MMBtu	N/A	~~1,475~~ 1422.7	370.6	~~1,475.0~~ 1422.7	62-296.405(1)(b)	C.7.
			Fuel Oil	8,760	0.1 lb/MMBtu	N/A	~~1,475~~ 313.1	71.5	~~1,475.0~~ 313.1	62-296.405(1)(b)	C.7.
		PM - SB	Coal	3 hr/day	0.3 lb/MMBtu	N/A	~~1,475~~ 605.5	1,111.4	~~1,475.0~~ 605.5	62-210.700(3)	C.8.
	-Acid Rain Phase I Unit	**	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	~~1,475~~ 605.5	1,111.4	~~1,475.0~~ 605.5	62-210.700(3)	C.8.
			Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	~~1,475~~ 117.4	214.4	~~1,475.0~~ 117.4	62-210.700(3)	C.8.
		SO_2	Coal	8,760	5.90 lb/MMBtu	N/A	~~87,035~~ 75,737.4	21,858.3	~~87,035.0~~ 75,737.4	62-296.405(1)(c)2.c.	C.9.
			Natural Gas	8,760	N/A	N/A	~~87,035~~ 8609.8	N/A	87,035.0 8609.8	N/A	N/A
			Fuel Oil	8,760	2.75 lb/MMBtu	N/A	~~87,035~~ 8609.8	1,965.7	~~87,035.0~~ 8609.8	62-296.405(1)(c)1.j.	C.10.
-007	Boiler #7	VE	Coal	8,760	40%			N/A	N/A	62-296.405(1)(a)	C.5.
	(6,406.4 MMBtu/hour - Coal)		Natural Gas	8,760	40%			N/A	N/A	62-296.405(1)(a)	C.5.
	(6,406.4 MMBtu/hour - N.G.)		Fuel Oil	8,760	40%			N/A	N/A	62-296.405(1)(a)	C.5.
	(1,282 MMBtu/hour Oil)	PM	Coal	8,760	0.1 lb/MMBtu	N/A	N/A	640.6	2,806.0	62-296.405(1)(b)	C.7.
			Natural Gas	8,760	0.1 lb/MMBtu	N/A	N/A	640.6	2,806.0	62-296.405(1)(b)	C.7.
			Fuel Oil	8,760	0.1 lb/MMBtu	N/A	N/A	128.2	561.5	62-296.405(1)(b)	C.7.
		PM - SB	Coal	3 hr/day	0.3 lb/MMBtu	N/A	N/A	1,921.9	~~3,607.6~~ 1052.3	62-210.700(3)	C.8.
	-Acid Rain Phase I Unit	**	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	1,921.9	~~3,607.6~~ 1052.3	62-210.700(3)	C.8.
			Fuel Oil	3 hr/day	0.3 lb/MMBtu	N/A	N/A	384.6	~~201.8~~ 210.6	62-210.700(3)	C.8.
		SO_2	Coal	8,760	5.90 lb/MMBtu	N/A	N/A	37,797.8	165,554.2	62-296.405(1)(c)2.c.	C.9.
			Natural Gas	8,760	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			Fuel Oil	8,760	2.75 lb/MMBtu	N/A	N/A	3,525.5	15,441.7	62-296.405(1)(c)1.j.	C.10.
-008	Fly Ash Silos (2)-150 tons/hr	VE	N/A	8,760	20%			N/A	N/A	62-296.320(4)(b)1.	D.4.

Notes:
* The "Equivalent Emissions" listed are for informational purposes.
** PM - SB refers to "soot blowing" and "load change".

Table 2-1, Summary of Compliance Requirements

Gulf Power Company
Crist Generating Plant

DRAFT Permit No.: 0330045-001-AV
Facility ID No.: 0330045

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E. U. ID No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date [2]	Min. Compliance Test Duration	CMS [1]	See Permit Condition(s)
-001	Boiler #1	VE	Natural Gas	DEP Method 9	Annually [3]	Sept. 30	60 Minutes	No	A.15. - 17., 21., 24. - 27., 30 .- 32.
	(320 MMBtu/hour -N.G.)		Fuel Oil	DEP Method 9	Annually [3]	Sept. 30	60 Minutes	No	
	(320 MMBtu/hour -Oil)	PM	Natural Gas	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	A.15., 18., 21. - 26., 28. - 32.
			Fuel Oil	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	
	-Acid Rain Phase II Unit	SO_2	Fuel Oil	Fuel Sampling & Analysis Provided by Vendor				No	A.14., 15., 19. - 26., 29. - 32.
-002	Boiler #2	VE	Natural Gas	DEP Method 9	Annually [3]	Sept. 30	60 Minutes	No	A.15. - 17., 21., 24. - 27., 30 .- 32.
	(320 MMBtu/hour -N.G.)		Fuel Oil	DEP Method 9	Annually [3]	Sept. 30	60 Minutes	No	
	(320 MMBtu/hour -Oil)	PM	Natural Gas	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	A.15., 18., 21. - 26., 28. - 32.
			Fuel Oil	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	
	-Acid Rain Phase II Unit	SO_2	Fuel Oil	Fuel Sampling & Analysis Provided by Vendor				No	A.14., 15., 19. - 26., 29. - 32.
-003	Boiler #3	VE	Natural Gas	DEP Method 9	Annually [3]	Sept. 30	60 Minutes	No	A.15. - 17., 21., 24. - 27., 30 .- 32.
	(550 MMBtu/hour -N.G.)		Fuel Oil	DEP Method 9	Annually [3]	Sept. 30	60 Minutes	No	
	(550 MMBtu/hour -Oil)	PM	Natural Gas	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	A.15., 18., 21. - 26., 28. - 32.
			Fuel Oil	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	
	-Acid Rain Phase II Unit	SO_2	Fuel Oil	Fuel Sampling & Analysis Provided by Vendor				No	A.14., 15., 19. - 26., 29. - 32.

Table 2-1, Summary of Compliance Requirements

Gulf Power Company
Crist Generating Plant

DRAFT Permit No.: 0330045-001-AV
Facility ID No.: 0330045

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E. U. ID No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date [2]	Min. Compliance Test Duration	CMS [1]	See Permit Condition(s)
-004	Boiler #4	VE	Coal	~~DEP Method 9~~ CEM	~~Annually~~ 6-min [3]	Sept. 30	~~6~~ 4 ~~Minutes~~	Yes	B.15., 19., 20., 26, 29.-36.
	(1,096.7 MMBtu/hour - Coal)		Natural Gas	~~DEP Method 9~~ CEM	~~Annually~~ 6-min [3]	Sept. 30	~~60~~ 4 Minutes	Yes	
	(1,096.7 MMBtu/hour - N.G.)		Fuel Oil	~~DEP Method 9~~ CEM	~~Annually~~ 6-min [3]	Sept. 30	~~60~~ 4 Minutes	Yes	
	(1,096.7 MMBtu/hour - Oil)	PM	Coal	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	B.17., 18., 21., 26. - 34., 36.
			Natural Gas	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	
			Fuel Oil	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	
	-Substitution Phase I	SO_2	Coal	~~6, 6A, 6B or 6C~~ CEM	~~Annually~~ 24-HOUR [3]	Sept. 30	24 1 Hour	Yes	B.15. - 18., 22. - 36.
	Acid Rain Unit		Natural Gas	6, 6A, 6B or 6C CEM	~~Annually~~ 24-HOUR [3]	Sept. 30	24 1 Hour	Yes	
			Fuel Oil	~~6, 6A, 6B or 6C~~ CEM	~~Annually~~ 24-HOUR [3]	Sept. 30	24 1 Hour	Yes	
-005	Boiler #5	VE	Coal	~~DEP Method 9~~ CEM	~~Annually~~ 6-min [3]	Sept. 30	6 ~~60~~ 4 Minutes	Yes	B.15., 19., 20., 26, 29.-36.
	(1,096.7 MMBtu/hour - Coal)		Natural Gas	~~DEP Method 9~~ CEM	~~Annually~~ 6-min [3]	Sept. 30	6 ~~60~~ 4 Minutes	Yes	
	(1,096.7 MMBtu/hour - N.G.)		Fuel Oil	~~DEP Method 9~~ CEM	~~Annually~~ 6-min [3]	Sept. 30	6 ~~60~~ 4 Minutes	Yes	
	(1,096.7 MMBtu/hour - Oil)	PM	Coal	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	B.17., 18., 21., 26. - 34., 36.
			Natural Gas	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	
			Fuel Oil	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	
	-Substitution Phase I	SO_2	Coal	~~6, 6A, 6B or 6C~~ CEM	~~Annually~~ 24-HOUR [3]	Sept. 30	24 1 Hour	Yes	B.15. - 18., 22. - 36.
	Acid Rain Unit		Natural Gas	~~6, 6A, 6B or 6C~~ CEM	~~Annually~~ 24-HOUR [3]	Sept. 30	24 1 Hour	Yes	
			Fuel Oil	~~6, 6A, 6B or 6C~~ CEM	~~Annually~~ 24-HOUR [3]	Sept. 30	24 1 Hour	Yes	

Table 2-1, Summary of Compliance Requirements

Gulf Power Company
Crist Generating Plant

DRAFT Permit No.: 0330045-001-AV
Facility ID No.: 0330045

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E. U. ID No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date [2]	Min. Compliance Test Duration	CMS [1]	See Permit Condition(s)
-006	Boiler #6	VE	Coal	~~DEP Method 9~~ CEM	~~Annually~~ 6-min [3]	Sept. 30	~~60~~ Minutes	Yes	C.17., 19., 20., 24., 26., 29.-31., 33. - 36.
	(3,704.8 MMBtu/hour - Coal)		Natural Gas	~~DEP Method 9~~ CEM	~~Annually~~ 6-min [3]	Sept. 30	~~60~~ Minutes	Yes	
	(3,704.8 MMBtu/hour - N.G.)		Fuel Oil	~~DEP Method 9~~ CEM	~~Annually~~ 6-min [3]	Sept. 30	~~60~~ Minutes	Yes	
	(714.8 MMBtu/hour - Oil)	PM	Coal	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	C.17., 18., 21., 26. - 31., 33., 34., 36.
			Natural Gas	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	
			Fuel Oil	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	
	-Acid Rain Phase I Unit	SO_2	Coal	~~6, 6A, 6B or 6C~~ CEM	~~Annually~~ 24-Hour [3]	Sept. 30	~~24~~ 1 Hour	Yes	C.15. - 18., 22. - 36.
			Natural Gas	~~6, 6A, 6B or 6C~~ CEM	~~Annually~~ 24-Hour [3]	Sept. 30	~~24~~ 1 Hour	Yes	
			Fuel Oil	Fuel Sampling & Analysis Provided by Vendor				Yes	
-007	Boiler #7	VE	Coal	~~DEP Method 9~~ CEM	~~Annually~~ 6-min [3]	Sept. 30	~~60~~ Minutes	Yes	C.17., 19., 20., 24., 26., 29.-31., 33. - 36.
	6,406.4 MMBtu/hour - Coal)		Natural Gas	~~DEP Method 9~~ CEM	~~Annually~~ 6-min [3]	Sept. 30	~~60~~ Minutes	Yes	
	(6,406.4 MMBtu/hour - N.G.)		Fuel Oil	~~DEP Method 9~~ CEM	~~Annually~~ 6-min [3]	Sept. 30	~~60~~ Minutes	Yes	
	(1,282 MMBtu/hour - Oil)	PM	Coal	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	C.17., 18., 21., 26. - 31., 33., 34., 36.
			Natural Gas	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	
			Fuel Oil	17, 5, 5B or 5F	Annually [3]	Sept. 30	1 Hour	No	
	-Acid Rain Phase I Unit	SO_2	Coal	~~6, 6A, 6B or 6C~~ CEM	~~Annually~~ 24-Hour [3]	Sept. 30	~~24~~ 1 Hour	Yes	C.15. - 18., 22. - 36.
			Natural Gas	~~6, 6A, 6B or 6C~~ CEM	~~Annually~~ 24-Hour [3]	Sept. 30	~~24~~ 1 Hour	Yes	
			Fuel Oil	Fuel Sampling & Analysis Provided by Vendor				Yes	
-008	Fly Ash Silos (2)-150 tons/hr	VE	Fly Ash	EPA Method 9	Annually	Sept. 30	1 Hour	No	D.7. - 12.

Notes:

[1] CMS [=] continuous monitoring system used for monitoring requirement in lieu of fuel sampling and analysis if marked 'yes'.
(Acceptable as long as CMS is maintained and calibrated as required.)

[2] Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

[3] Test not required in years that liquid and/or solid fuel fired less than 400 hours other than startup/shutdown.

~~[4] If a combustion turbine is operated less than 400 hours per year, test is only required once every 5 years, during the year prior to permit renewal.~~

Jonathan Holtom

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

OGC No. _____

Gulf Power Company
One Energy Place
Pensacola, FL 32520

DRAFT Permit No.: 0330045-001-AV
Crist Plant
Escambia County

_____/

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, Gulf Power Company (Gulf) hereby requests, pursuant to Florida Administrative Code Rules 28-106.111(3) and 62-103.050(1), an extension of time, to and including October 31, 1997, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, Gulf states the following:

1. On or about October 6, 1997, Gulf received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0330045-001-AV) for the Crist Plant located in Escambia County, Florida. Along with the Intent to Issue, Gulf received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."

2. Based on Gulf's review, the draft permit and associated documents contain several provisions that warrant clarification or correction.

3. Representatives of Gulf intend to correspond with staff of the Department's Bureau of Air Regulation in the near future in an effort to resolve all issues.

4. This request is filed simply as a protective measure to avoid waiver of Gulf's right to challenge certain conditions contained in the draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing.

5. Jonathan Holtom with the Bureau of Air Regulation has agreed to an extension until October 31, 1997, on behalf of the Department. Counsel for Gulf has contacted Jeffrey Brown with the Department's Office of General Counsel regarding this request, and he has no objection.

WHEREFORE, Gulf respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0330045-001-AV be formally extended to and including October 31, 1997.

Respectfully submitted this 17th day of October, 1997.

HOPPING GREEN SAMS & SMITH, P.A.

Angela R. Morrison
Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(904) 222-7500

Attorney for GULF POWER COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by U.S. Mail on this 17th day of October, 1997:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Angela R. Morrison

100333

Date: 10/6/97 4:31:42 PM
From: Elizabeth Walker TAL
Subject: New Posting

There is a new posting available on the Florida Website.

CRIST PLANT-GOVERNOR'S BAYOU 0330045001AV Draft

The notification letter is encoded and attached. If you have any questions, please let me know.

Thanks,
Elizabeth

Jonathan Holtom

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6000

GULF POWER
A SOUTHERN COMPANY

October 3, 1997

Mr. Scott M. Sheplak
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Sheplak:

Re: GULF POWER COMPANY ACID RAIN PHASE II APPLICATION REVISION
PLANT CRIST, PLANT SCHOLZ, PLANT LANSING SMITH

Gulf Power Company hereby requests a revision of our active Acid Rain Phase II and Title V permit applications on file with the Florida Department of Environmental Protection. Our request is pursuant to a change of the "Designated Representative" for Gulf Power under the Acid Rain Program. These revisions (3) were submitted to the Environmental Protection Agency on April 3, 1997 as required under 40 CFR 72.24 of the Clean Air Act Amendments of 1990. Copies are attached for your review. Please update Gulf Power's active Acid Rain Phase II and Title V permit applications for Plant Crist, Plant Scholz and Plant Lansing Smith regarding this change.

If you have questions or need further information regarding the Designated Representative under the Acid Rain Program, please call me at (904) 444-6527.

Sincerely,

G. Dwain Waters
Air Quality Programs Coordinator, QEP

Attachments (3)
See Distribution Sheet

DISTRIBUTION SHEET

cc w/oatt: J. O. Vick, Gulf Power Company
J. M. Dominey, Gulf Power Company
S. H. Houston, Gulf Power Company
K. Peacock, Gulf Power Company

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0221
Expires 1-31-96

Certificate of Representation

For more information, see instructions and refer to 40 CFR 72.24

This submission is: ☐ New ☒ Revised

This submission includes combustion or process sources under 40 CFR part 74 ☐

STEP 1
Identify the source by plant name, State, and, if applicable, ORIS code from NADB.

Plant Name	State	ORIS Code
Crist Electric Generating Plant	FL	641

STEP 2
Enter requested information for the designated representative.

Name	Robert G. Moore
Address	One Energy Place Pensacola, Florida 32520-0100
Phone Number	(850) 444-6383
Fax Number	(850) 444-6744

STEP 3
Enter requested information for the alternate designated representative, if applicable.

Name	
Address	
Phone Number	Fax Number

STEP 4
Complete Step 5, read the certifications, and sign and date. For a designated representative of a combustion or process source under 40 CFR part 74, the references in the certifications to "affected unit" or "affected units" also apply to the combustion or process source under 40 CFR part 74 and the references to "affected source" also apply to the source at which the combustion or process source is located.

I certify that I was selected as the designated representative or alternate designated representative, as applicable, by an agreement binding on the owners and operators of the affected source and each affected unit at the source.

I certify that I have given notice of the agreement, selecting me as the designated representative or alternate designated representative, as applicable, for the affected source and each affected unit at the source identified in this certificate of representation, daily for a period of one week in a newspaper of general circulation in the area where the source is located or in a State publication designed to give general public notice.

I certify that I have all necessary authority to carry out my duties and responsibilities under the Acid Rain Program on behalf of the owners and operators of the affected source and of each affected unit at the source and that each such owner and operator shall be fully bound by my actions, inactions, or submissions.

I certify that I shall abide by any fiduciary responsibilities imposed by the agreement by which I was selected as designated representative or alternate designated representative, as applicable.

I certify that the owners and operators of the affected source and of each affected unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, an affected unit, or where a utility or industrial customer purchases power from an affected unit under life-of-the-unit, firm power contractual arrangements, I certify that:

I have given a written notice of my selection as the designated representative or alternate designated representative, as applicable, and of the agreement by which I was selected to each owner and operator of the affected source and of each affected unit at the source; and

Allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement or, if such multiple holders have expressly provided for a different distribution of allowances by contract, that allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in accordance with the contract.

BEST AVAILABLE COPY

Crist Electric Generating Plant Plant Name (from Step 1)	Certificate - Page 2 Page 2 of 2

The agreement by which I was selected as the alternate designated representative, if applicable, includes a procedure for the owners and operators of the source and affected units at the source to authorize the alternate designated representative to act in lieu of the designated representative.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Signature (designated representative) Robert G. Moore	Date 10/1/97
Signature (alternate designated representative)	Date

STEP 5
Provide the name of every owner and operator of the source and each affected unit (or combustion or process source) at the source. Identify the units they own and/or operate by boiler ID# from NADB, if applicable. For owners only, identify each state or local utility regulatory authority with ratemaking jurisdiction over each owner, if applicable.

Name Crist Electric Generating Plant					☐ Owner	☒ Operator
ID# 1	ID# 2	ID# 3	ID# 4	ID# 5	ID# 6	ID# 7
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities Florida Public Service Commission						

Name					☐ Owner	☐ Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities						

Name					☐ Owner	☐ Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities						

Name					☐ Owner	☐ Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities						

Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

Fax Transmittal Form

To : Jonathan Holtom

Location : DARM

Fax Number : ~~292-6979~~ 292-6979

Number of pages including cover sheet: 3

From : Carol Melton

Comments : Re: Gulf Power's Heat Inputs

Date Faxed :

Faxed by :

If there are problems with this transmittal,

please call the person listed above.

Telephone (904)444-8300 or Suncom 693-8300

Fax Number (904)444-8417 or Suncom 693-8417

Gulf Power Company
500 Bayfront Parkway
Post Office Box 1151
Pensacola, FL 32520-1151
Telephone 904 444-6111

SO2 Inventory

Gulf Power
the southern electric system

September 27, 1991

Ed W 9/27

Mr. Ed K. Middleswart
Florida Department of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Dear Mr. Middleswart:

1990 EMISSIONS INVENTORY

As per your request during our meeting on September 9, 1991, please find enclosed the 1990 emissions inventory for sulfur dioxide and particulate matter at Gulf Power's generating facilities. A realistic estimate for nitrogen oxide emissions is not currently available because we feel the AP-42 calculation under estimates emissions for the type of boilers operated by Gulf Power. I have included however, several background papers regarding NO_x formation and control strategies.

Should you have any questions, please feel free to call me at 444-6527.

Sincerely,

G. Dwain Waters
Senior Environmental Affairs Specialist

rc/0013GDW

Enclosures

cc: M. L. Gilchrist
J. O. Vick

GULF POWER COMPANY EMISSIONS INVENTORY
1990

PLANT	FUEL TYPE	FUEL QUANTITY	BTU/UNIT	BTU CONSUMED (MILLION)	PARTICULATE (TONS)	SULFUR DIOXIDE (TONS)
CRIST 1	GAS	196788	1000	196788	0.30	0.06
	NO.6 OIL	215544	148055	31912	1.94	25.38
2	GAS	219126	1000	219126	0.33	0.07
	NO.6 OIL	164724	147959	24372	1.48	19.40
3	GAS	402228	1000	402228	0.60	0.12
	NO.6 OIL	133600	148000	19773	1.20	15.73
4	GAS	76750	1000	76750	0.12	0.02
	NO.2 OIL	32359	137002	4433	0.03	1.15
	COAL	176870	11956	4229315	27.27	9691.59
5	GAS	76708	1000	76708	0.12	0.02
	NO.2 OIL	33205	136942	4547	0.03	1.78
	COAL	170858	11976	4092388	72.97	9362.16
6	GAS	23990	1000	23990	0.04	0.01
	NO.2 OIL	100672	136979	13790	0.10	3.57
	COAL	528149	11960	12633329	225.29	28939.93
7	GAS	41055	1000	41055	0.06	0.01
	NO.2 OIL	185342	136992	25390	0.19	6.58
	COAL	914760	11965	21890208	1075.50	50124.27
SUBTOTAL	GAS	1036645		1036645	1.56	0.31
	NO.6 OIL	513868		76058	4.62	60.506
	NO.2 OIL	351578		48161	0.35	13.08
	COAL	1790637		42845240	1401.03	98117.95
CRIST TOTAL				44006104	1407.56	98191.85
						(4.461b/MBTU)
SMITH 1	NO.2 OIL	107067	136998	14668	0.11	3.80
	COAL	300284	12050	7236844	77.33	15927.08
2	NO.2 OIL	174148	136996	23858	0.17	6.18
	COAL	337560	12069	8148016	109.67	17904.17
CT	NO.2 OIL	196289	137001	26892	0.49	6.87
SUBTOTAL	NO.2 OIL	477504		65417	0.77	16.85
	COAL	637844		15384860	187.00	33831.25
SMITH TOTAL				15450278	187.77	33848.10
						(4.381b/MBTU)
SCHOLZ 1	NO.2 OIL	12819	137000	1756	0.01	0.46
	COAL	131745	12348	3253581	17.76	7218.96
2	NO.2 OIL	11972	137213	1643	0.01	0.43
	COAL	117887	12348	2911335	15.95	6459.60
SUBTOTAL	NO.2 OIL	24791		3399	0.03	0.88
	COAL	249632		6164916	33.71	13678.56
SCHOLZ TOTAL				6168315	33.74	13679.44
						(4.441b/MBTU)
SUBTOTALS	GAS	1036645		1036645	1.56	0.31
	NO.6 OIL	513868		76058	4.62	60.506
	NO.2 OIL	853873		116977	1.15	30.81
	COAL	2678113		64395017	1621.74	145627.76
	TOTAL			65624696	1629.06	145719.39
						(4.441b/MBTU)

500 Bayfront Parkway
Pensacola, FL 32520

Tel 904.444.6000

GULF POWER
A SOUTHERN COMPANY

Certified Mail

June 24, 1997

Mr. R. Scott Davis
EPA Region IV Federal Center
Air and Radiation Technology Branch
61 Forsyth St. , SW
Atlanta, GA 30303

Dear Mr. Davis:

RE: Revised Gulf/Mississippi Power Phase I NOx Averaging Plan
Oris Codes: 641, 642, 2049, 6073

Pursuant to our recent discussions, please find attached one original and 3 copies of revised Phase I Permit Application NOx Compliance Plans for Phase I units located at Plants Crist, Scholz, Watson and Daniel (Oris Codes: 641, 642, 2049, 6073, respectively). Included in this request is a revised Gulf/Mississippi NOx Averaging Plan which incorporates Crist Unit 7 in the plan for 1997 through 1999.

If you have any questions or need further information regarding these permit revisions, please call me at (904) 444 -6527.

Sincerely,

G. Dwain Waters
Air Quality Programs Coordinator, QEP

cc: G. Edison Holland, Jr., Gulf Power Company
Scott Sheplak, Florida Department of Environmental Protection
B. J. Hailey, Mississippi Department of Environmental Quality
Danny Herrin, Southern Company Services
Rick Berry, Mississippi Power Company
Jim Vick, Gulf Power Company

for Standardization (ISO), Case Postale 56, CH–1211 Geneve 20, Switzerland.

(1) ISO 9931 (December, 1991) "Coal—Sampling of Pulverized Coal Conveyed by Gases in Direct Fired Coal Systems," IBR approved May 23, 1995 for § 76.15.

(2) [Reserved]

§ 76.5 NO_X emission limitations for Group 1 boilers.

(a) Beginning January 1, 1996, or for a unit subject to section 404(d) of the Act, the date on which the unit is required to meet Acid Rain emission reduction requirements for SO_2, the owner or operator of a Phase I coal-fired utility unit with a tangentially fired boiler or a dry bottom wall-fired boiler (other than units applying cell burner technology) shall not discharge, or allow to be discharged, emissions of NO_X to the atmosphere in excess of the following limits, except as provided in paragraphs (c) or (e) of this section or in § 76.10, 76.11, or 76.12:

(1) 0.45 lb/mmBtu of heat input on an annual average basis for tangentially fired boilers.

(2) 0.50 lb/mmBtu of heat input on an annual average basis for dry bottom wall-fired boilers (other than units applying cell burner technology).

(b) The owner or operator shall determine the annual average NO_X emission rate, in lb/mmBtu, using the methods and procedures specified in part 75 of this chapter.

(c) Unless the unit meets the early election requirement of § 76.8, the owner or operator of a coal-fired substitution unit with a tangentially fired boiler or a dry bottom wall-fired boiler (other than units applying cell burner technology) that satisfies the requirements of § 76.1(c)(2), shall comply with the NO_X emission limitations that apply to Group 1, Phase II boilers.

(d) The owner or operator of a Phase I unit with a cell burner boiler that converts to a conventional wall-fired boiler on or before January 1, 1995 or, for a unit subject to section 404(d) of the Act, the date the unit is required to meet Acid Rain emissions reduction requirements for SO_2 shall comply, by such respective date or January 1, 1996, whichever is later, with the NO_X emissions limitation applicable to dry bottom wall-fired boilers under paragraph (a) of this section, except as provided in paragraphs (c) or (e) of this section or in § 76.10, 76.11, or 76.12.

(e) The owner or operator of a Phase I unit with a Group 1 boiler that converts to a fluidized bed or other type of utility boiler not included in Group 1 boilers on or before January 1, 1995 or, for a unit subject to section 404(d) of the Act, the date the unit is required to meet Acid Rain emissions reduction requirements for SO_2 is exempt from the NO_X emissions limitations specified in paragraph (a) of this section, but shall comply with the NO_X emission limitations for Group 2 boilers under § 76.6.

(f) Except as provided in § 76.8 and in paragraph (c) of this section, each unit subject to the requirements of this section is not subject to the requirements of § 76.7.

[60 FR 18761, Apr. 13, 1995, as amended at 61 FR 67162, Dec. 19, 1996]

§ 76.6 NO_X emission limitations for Group 2 boilers.

(a) Beginning January 1, 2000 or, for a unit subject to section 409(b) of the Act, the date on which the unit is required to meet Acid Rain emission reduction requirements for SO_2, the owner or operator of a Group 2, coal-fired boiler with a cell burner boiler, cyclone boiler, a wet bottom boiler, or a vertically fired boiler shall not discharge, or allow to be discharged, emissions of NO_X to the atmosphere in excess of the following limits, except as provided in §§ 76.10 or 76.11:

(1) 0.68 lb/mmBtu of heat input on an annual average basis for cell burner boilers. The NO_X emission control technology on which the emission limitation is based is plug-in combustion controls or non-plug-in combustion controls. Except as provided in § 76.5(d), the owner or operator of a unit with a cell burner boiler that installs non-plug-in combustion controls after November 15, 1990 shall comply with the emission limitation applicable to cell burner boilers. The owner or operator of a unit with a cell burner that installs non-plug-in combustion controls on or before November 15, 1990 shall comply with the applicable emission

limitation for dry bottom wall-fired boilers.

(2) 0.86 lb/mmBtu of heat input on an annual average basis for cyclone boilers with a Maximum Continuous Steam Flow at 100% of Load of greater than 1060, in thousands of lb/hr. The NO_X emission control technology on which the emission limitation is based is natural gas reburning or selective catalytic reduction.

(3) 0.84 lb/mmBtu of heat input on an annual average basis for wet bottom boilers, with a Maximum Continuous Steam Flow at 100% of Load of greater than 450, in thousands of lb/hr. The NO_X emission control technology on which the emission limitation is based is natural gas reburning or selective catalytic reduction.

(4) 0.80 lb/mmBtu of heat input on an annual average basis for vertically fired boilers. The NO_X emission control technology on which the emission limitation is based is combustion controls.

(b) The owner or operator shall determine the annual average NO_X emission rate, in lb/mmBtu, using the methods and procedures specified in part 75 of this chapter.

[62 FR 67162, Dec. 19, 1996; 62 FR 3464, Jan. 23, 1997; 62 FR 32040, June 12, 1997]

§ 76.7 Revised NO_X emission limitations for Group 1, Phase II boilers.

(a) Beginning January 1, 2000, the owner or operator of a Group 1, Phase II coal-fired utility unit with a tangentially fired boiler or a dry bottom wall-fired boiler shall not discharge, or allow to be discharged, emissions of NO_X to the atmosphere in excess of the following limits, except as provided in §§ 76.8, 76.10, or 76.11:

(1) 0.40 lb/mmBtu of heat input on an annual average basis for tangentially fired boilers.

(2) 0.46 lb/ mmBtu of heat input on an annual average basis for dry bottom wall-fired boilers (other than units applying cell burner technology).

(b) The owner or operator shall determine the annual average NO_X emission rate, in lb/mmBtu, using the methods and procedures specified in part 75 of this chapter.

[60 FR 18761, Apr. 13, 1995, as amended at 61 FR 67163, Dec. 19, 1996]

§ 76.8 Early election for Group 1, Phase II boilers.

(a) *General provisions.* (1) The owner or operator of a Phase II coal-fired utility unit with a Group 1 boiler may elect to have the unit become subject to the applicable emissions limitation for NO_X under § 76.5, starting no later than January 1, 1997.

(2) The owner or operator of a Phase II coal-fired utility unit with a Group 1 boiler that elects to become subject to the applicable emission limitation under § 76.5 shall not be subject to § 76.7 until January 1, 2008, provided the designated representative demonstrates that the unit is in compliance with the limitation under § 76.5, using the methods and procedures specified in part 75 of this chapter, for the period beginning January 1 of the year in which the early election takes effect (but not later than January 1, 1997) and ending December 31, 2007.

(3) The owner or operator of any Phase II unit with a cell burner boiler that converts to conventional burner technology may elect to become subject to the applicable emissions limitation under § 76.5 for dry bottom wall-fired boilers, provided the owner or operator complies with the provisions in paragraph (a)(2) of this section.

(4) The owner or operator of a Phase II unit approved for early election shall not submit an application for an alternative emissions limitation demonstration period under § 76.10 until the earlier of:

(i) January 1, 2008; or

(ii) Early election is terminated pursuant to paragraph (e)(3) of this section.

(5) The owner or operator of a Phase II unit approved for early election may not incorporate the unit into an averaging plan prior to January 1, 2000. On or after January 1, 2000, for purposes of the averaging plan, the early election unit will be treated as subject to the applicable emissions limitation for NO_X for Phase II units with Group 1 boilers under § 76.7.

(b) *Submission requirements.* In order to obtain early election status, the designated representative of a Phase II unit with a Group 1 boiler shall submit an early election plan to the Administrator by January 1 of the year the

compliance for the calendar year in accordance with the procedures in §76.13(a).

[60 FR 18761, Apr. 13, 1995, as amended at 61 FR 67163, Dec. 19, 1996]

§76.11 Emissions averaging.

(a) *General provisions.* In lieu of complying with the applicable emission limitation in §76.5, 76.6, or 76.7, any affected units subject to such emission limitation, under control of the same owner or operator, and having the same designated representative may average their NO_X emissions under an averaging plan approved under this section.

(1) Each affected unit included in an averaging plan for Phase I shall be a Phase I unit with a Group 1 boiler subject to an emission limitation in §76.5 during all years for which the unit is included in the plan.

(i) If a unit with an approved NO_X compliance extension is included in an averaging plan for 1996, the unit shall be treated, for the purposes of applying Equation 1 in paragraph (a)(6) of this section and Equation 2 in paragraph (d)(1)(ii)(A) of this section, as subject to the applicable emissions limitation under §76.5 for the entire year 1996.

(ii) A Phase II unit approved for early election under §76.8 shall not be included in an averaging plan for Phase I.

(2) Each affected unit included in an averaging plan for Phase II shall be a boiler subject to an emission limitation in §76.5, 76.6, or 76.7 for all years for which the unit is included in the plan.

(3) Each unit included in an averaging plan shall have an alternative contemporaneous annual emission limitation (lb/mmBtu) and can only be included in one averaging plan.

(4) Each unit included in an averaging plan shall have a minimum allowable annual heat input value (mmBtu), if it has an alternative contemporaneous annual emission limitation more stringent than that unit's applicable emission limitation under §76.5, 76.6, or 76.7, and a maximum allowable annual heat input value, if it has an alternative contemporaneous annual emission limitation less stringent than that unit's applicable emission limitation under §76.5, 76.6, or 76.7.

(5) The Btu-weighted annual average emission rate for the units in an averaging plan shall be less than or equal to the Btu-weighted annual average emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in §76.5, 76.6, or 76.7.

(6) In order to demonstrate that the proposed plan is consistent with paragraph (a)(5) of this section, the alternative contemporaneous annual emission limitations and annual heat input values assigned to the units in the proposed averaging plan shall meet the following requirement:

$$\frac{\sum_{i=1}^{n}\left(R_{Li}\times HI_i\right)}{\sum_{i=1}^{n} HI_i} \le \frac{\sum_{i=1}^{n}\left(R_{li}\times HI_i\right)}{\sum_{i=1}^{n} HI_i} \qquad \text{(Equation 1)}$$

Where:

R_{Li} = Alternative contemporaneous annual emission limitation for unit i, lb/mmBtu, as specified in the averaging plan;

R_{li} = Applicable emission limitation for unit i, lb/mmBtu, as specified in §76.5, 76.6, or 76.7 except that for early election units, which may be included in an averaging plan only on or after January 1, 2000, R_{li} shall equal the most stringent applicable emission limitation under §76.5 or 76.7;

HI_i = Annual heat input for unit i, mmBtu, as specified in the averaging plan;

n = Number of units in the averaging plan.

(7) For units with an alternative emission limitation, R_{li} shall equal the applicable emissions limitation under §76.5, 76.6, or 76.7, not the alternative emissions limitation.

(8) No unit may be included in more than one averaging plan.

(b)(1) *Submission requirements.* The designated representative of a unit meeting the requirements of paragraphs (a)(1), (a)(2), and (a)(8) of this section may submit an averaging plan (or a revision to an approved averaging plan) to the permitting authority(ies) at any time up to and including January 1 (or July 1, if the plan is restricted to units located within a single permitting authority's jurisdiction) of the calendar year for which the averaging plan is to become effective.

(2) The designated representative shall submit a copy of the same averaging plan (or the same revision to an approved averaging plan) to each permitting authority with jurisdiction over a unit in the plan.

(3) When an averaging plan (or a revision to an approved averaging plan) is not approved, the owner or operator of each unit in the plan shall operate the unit in compliance with the emission limitation that would apply in the absence of the averaging plan (or revision to a plan).

(c) *Contents of NO_X averaging plan.* A complete NO_X averaging plan shall include the following elements in a format prescribed by the Administrator:

(1) Identification of each unit in the plan;

(2) Each unit's applicable emission limitation in §76.5, 76.6, or 76.7;

(3) The alternative contemporaneous annual emission limitation for each unit (in lb/mmBtu). If any of the units identified in the NO_X averaging plan utilize a common stack pursuant to §75.17(a)(2)(i)(B) of this chapter, the same alternative contemporaneous emission limitation shall be assigned to each such unit and different heat input limits may be assigned;

(4) The annual heat input limit for each unit (in mmBtu);

(5) The calculation for Equation 1 in paragraph (a)(6) of this section;

(6) The calendar years for which the plan will be in effect; and

(7) The special provisions in paragraph (d)(1) of this section.

(d) *Special provisions.*— (1) *Emission limitations.* Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitation for NO_X under the plan only if the following requirements are met:

(i) For each unit, the unit's actual annual average emission rate for the calendar year, in lb/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan; and

(A) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in §76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan;

(B) For each unit with an alternative contemporaneous annual emission limitation more stringent than the applicable emission limitation in §76.5, 76.6, or 76.7, the actual annual heat input for thecalendar year is not less than the annual heat input limit in the averaging plan; or

(ii) If one or more of the units does not meet the requirements under paragraph (d)(1)(i) of this section, the designated representative shall demonstrate, in accordance with paragraph (d)(1)(ii)(A) of this section (Equation 2) that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in §76.5, 76.6, or 76.7.

(A) A group showing of compliance shall be made based on the following equation:

$$\frac{\sum_{i=1}^{n}(R_{ai} \times HI_{ai})}{\sum_{i=1}^{n} HI_{ai}} \leq \frac{\sum_{i=1}^{n}(R_{li} \times HI_{ai})}{\sum_{i=1}^{n} HI_{ai}} \quad \text{(Equation 2)}$$

Where:

R_{ai} = Actual annual average emission rate for unit i, lb/mmBtu, as determined using the procedures in part 75 of this chapter. For units in an averaging plan utilizing a common stack pursuant to §75.17(a)(2)(i)(B) of this chapter, use the same NO_X emission rate value for each unit utilizing the common stack, and calculate this value in accordance with appendix F to part 75 of this chapter;

R_{li} = Applicable annual emission limitation for unit i lb/mmBtu, as specified in §76.5, 76.6, or 76.7, except that for early election units, which may be included in an averaging plan only on or after January 1, 2000, R_{li} shall equal the most stringent applicable emission limitation under §76.5 or 76.7;

HI_{ai} = Actual annual heat input for unit i, mmBtu, as determined using the procedures in part 75 of this chapter;

n = Number of units in the averaging plan.

(B) For units with an alternative emission limitation, R_{li} shall equal the applicable emission limitation under §76.5, 76.6, or 76.7, not the alternative emission limitation.

(C) If there is a successful group showing of compliance under paragraph (d)(1)(ii)(A) of this section for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under paragraph (d)(1)(i) of this section.

(2) *Liability.* The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.

(3) *Withdrawal or termination.* The designated representative may submit a notification to terminate an approved averaging plan in accordance with §72.40(d) of this chapter, no later than October 1 of the calendar year for which the plan is to be withdrawn or terminated.

§76.12 Phase I NO_X compliance extension.

(a) *General provisions.* (1) The designated representative of a Phase I unit with a Group 1 boiler may apply for and receive a 15-month extension of the deadline for meeting the applicable emissions limitation under §76.5 where it is demonstrated, to the satisfaction of the Administrator, that:

(i) The low NO_X burner technology designed to meet the applicable emission limitation is not in adequate supply to enable installation and operation at the unit, consistent with system reliability, by January 1, 1995 and the reliability problems are due substantially to NO_X emission control system installation and availability; or

(ii) The unit is participating in an approved clean coal technology demonstration project.

(2) In order to obtain a Phase I NO_X compliance extension, the designated representative shall submit a Phase I NO_X compliance extension plan by October 1, 1994.

(b) *Contents of Phase I NO_X compliance extension plan.* A complete Phase I NO_X compliance extension plan shall include the following elements in a format prescribed by the Administrator:

(1) Identification of the unit.

(2) For units applying pursuant to paragraph (a)(1)(i) of this section:

(i) A list of the company names, addresses, and telephone numbers of vendors who are qualified to provide the

are replaced with the term "heat input" and the phrase "SO_2 continuous emission monitoring system and flow monitoring system" is replaced with the phrase "a diluent monitor and a flow monitor".

(2) Notwithstanding paragraph (e)(1) of this section, for any common stack where any unit utilizing the common stack has a NO_X emission limitation pursuant to Section 407(b) of the Act, the owner or operator shall not combine heat input for compliance purposes and shall determine heat input for that unit separately.

(3) Notwithstanding paragraph (e)(1) of this section, during the period prior to January 1, 2000, the owner or operator shall not combine heat input for units utilizing a common stack in order to determine heat input for each unit for purposes of § 75.10.

(4) In the event that an owner or operator of a unit with a bypass stack does not install and certify a diluent monitor and flow monitoring system in a bypass stack, the owner or operator shall determine total heat input to the unit for each unit operating hour during which the bypass stack is used according to the missing data provisions for heat input under § 75.36 or the procedures for calculating heat input from fuel sampling and analysis in section 5.5 of appendix F of this part.

(5) The owner or operator of an affected unit with a diluent monitor and a flow monitor installed on a common stack to determine heat input at the common stack may choose to apportion the heat input from the common stack to each affected unit utilizing the common stack by using either of the following two methods, provided that all of the units utilizing the common stack are combusting fuel with the same F-factor found in section 3 of appendix F of this part. The heat input may be apportioned either by using the ratio of load (in MWe) for each individual unit to the total load for all units utilizing the common stack or by using the ratio of steam flow (in 1000 lb/hr) for each individual unit to the total steam flow for all units utilizing the common stack.

[60 FR 26522, May 17, 1995, as amended at 61 FR 25582, May 22, 1996; 61 FR 59158, Nov. 20, 1996]

§ 75.17 Specific provisions for monitoring emissions from common, bypass, and multiple stacks for NO_x emission rate.

(a) *Unit utilizing common stack with other affected unit(s).* When an affected unit utilizes a common stack with one or more affected units, but no nonaffected units, the owner or operator shall either:

(1) Install, certify, operate, and maintain a NO_x continuous emission monitoring system in the duct to the common stack from each affected unit; or

(2) Install, certify, operate, and maintain a NO_x continuous emission monitoring system in the common stack and follow the appropriate procedure in paragraphs (a)(2) (i) through (iii) of this section, depending on whether or not the units are required to comply with a NO_x emission limitation (in lb/mmBtu, annual average basis) pursuant to section 407(b) of the Act (referred to hereafter as "NO_x emission limitation").

(i) When each of the affected units has a NO_x emission limitation, the designated representative shall submit a compliance plan to the Administrator that indicates:

(A) Each unit will comply with the most stringent NO_x emission limitation of any unit utilizing the common stack; or

(B) Each unit will comply with the applicable NO_X emission limitation by averaging its emissions with the other unit(s) utilizing the common stack, pursuant to the emissions averaging plan submitted under part 76 of this chapter; or

(C) Each unit's compliance with the applicable NO_X emission limit will be determined by a method satisfactory to the Administrator for apportioning to each of the units the combined NO_X emission rate (in lb/mmBtu) measured in the common stack, as provided in a petition submitted by the designated representative. The Administrator may approve such demonstrated substitute methods for apportioning NO_X emission rate measured in a common stack whenever the demonstration ensures complete and accurate estimation of all emissions regulated under this part.

(ii) When none of the affected units has a NO_x emission limitation, the

owner or operator and the designated representative have no additional obligations pursuant to section 407 of the Act and may record and report a combined NO_x emission rate (in lb/mmBtu) for the affected units utilizing the common stack.

(iii) When at least one of the affected units has a NO_x emission limitation and at least one of the affected units does not have a NO_x emission limitation, the owner or operator shall either:

(A) Install, certify, operate, and maintain NO_x and diluent monitors in the ducts from the affected units; or

(B) Develop, demonstrate, and provide information satisfactory to the Administrator on methods for apportioning the combined NO_x emission rate (in lb/mmBtu) measured in the common stack on each of the units. The Administrator may approve such demonstrated substitute methods for apportioning the combined NO_x emission rate measured in a common stack whenever the demonstration ensures complete and accurate estimation of all emissions regulated under this part.

(b) *Unit utilizing common stack with nonaffected unit(s).* When one or more affected units utilizes a common stack with one or more nonaffected units, the owner or operator shall either:

(1) Install, certify, operate, and maintain a NO_x continuous emission monitoring system in the duct from each affected unit; or

(2) Develop, demonstrate, and provide information satisfactory to the Administrator on methods for apportioning the combined NO_x emission rate (in lb/mmBtu) measured in the common stack for each of the units. The Administrator may approve such demonstrated substitute methods for apportioning the combined NO_x emission rate measured in a common stack whenever the demonstration ensures complete and accurate estimation of all emissions regulated under this part.

(c) *Unit with multiple stacks or bypass stack.* When the flue gases from an affected unit utilize two or more ducts feeding into two or more stacks (that may include flue gases from other affected or nonaffected units), or when owner or operator chooses to monitor in the ducts rather than the stack, the owner or operator shall monitor the NO_X emission rate representative of each affected unit. Where another unit also exhausts flue gases to one or more of the stacks where monitoring systems are installed, the owner or operator shall also comply with the applicable common stack monitoring requirements of this section. The owner or operator shall either:

(1) Install, certify, operate, and maintain a NO_X continuous emission monitoring system in each stack or duct and determine the NO_X emission rate for the unit as the Btu-weighted sum of the NO_X emission rates measured in the stacks or ducts using the heat input estimation procedures in appendix F of this part; or

(2) Install, certify, operate, and maintain a NO_X continuous emission monitoring system in one stack or duct from each affected unit and record the monitored value as the NO_X emission rate for the unit. The owner or operator shall account for NO_X emissions from the unit during all times when the unit combusts fuel.

[58 FR 3701, Jan. 11, 1993, as amended at 60 FR 26523, May 17, 1995]

§ 75.18 Specific provisions for monitoring emissions from common and bypass stacks for opacity.

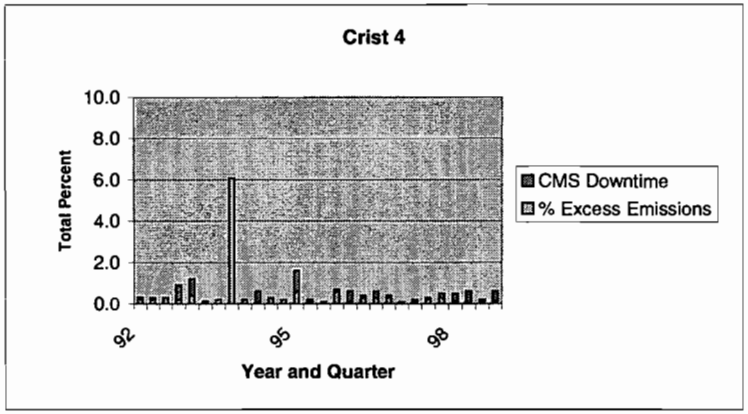
(a) *Unit using common stack.* When an affected unit utilizes a common stack with other affected units or nonaffected units, the owner or operator shall comply with the applicable monitoring provision in this paragraph, as determined by existing Federal, State, or local opacity regulations.

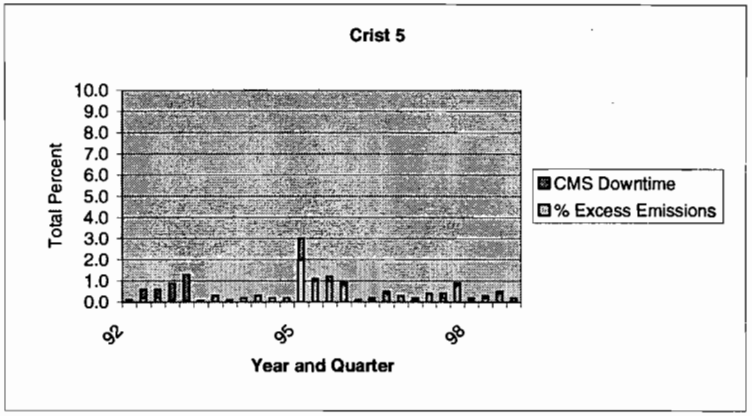
(1) Where another regulation requires the installation of a continuous opacity monitoring system upon each affected unit, the owner or operator shall install, certify, operate, and maintain a continuous opacity monitoring system meeting Performance Specification 1 in appendix B to part 60 of this chapter (referred to hereafter as a "certified continuous opacity monitoring system") upon each unit.

(2) Where another regulation does not require the installation of a continuous

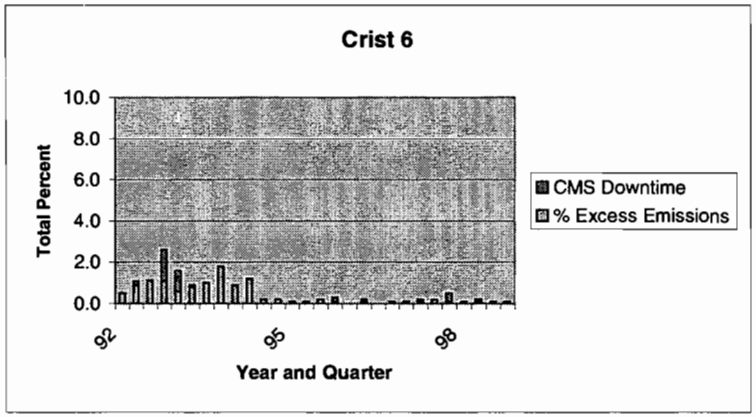
Opacity Excess Emissions Report for Crist (1992-1997)

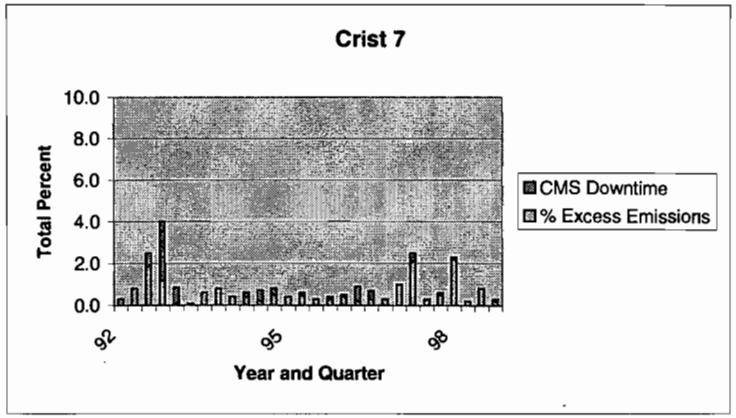
Year		92				93				94				95				96				97				98				5 Year Avg.
Quarter		1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	
Crist 4	% Excess emissions	0.2	0.2	0.3	0.2	0.4	0.1	0.2	6.1	0.2	0.1	0.3	0.2	0.6	0.1	0.0	0.6	0.1	0.3	0.3	0.3	0.0	0.1	0.2	0.3	0.1	0.0	0.1	0.1	0.2
	% CMS Downtime	0.1	0.1	0.0	0.7	0.8	0.1	0.0	0.0	0.0	0.5	0.0	0.0	1.0	0.1	0.1	0.1	0.5	0.1	0.3	0.1	0.1	0.1	0.1	0.2	0.4	0.6	0.1	0.5	0.2
	Total Percent	0.3	0.3	0.3	0.9	1.2	0.1	0.2	6.1	0.2	0.6	0.3	0.2	1.6	0.2	0.1	0.7	0.6	0.4	0.6	0.4	0.1	0.2	0.3	0.5	0.5	0.6	0.2	0.6	0.4
Crist 5	% Excess emissions	0.1	0.2	0.2	0.1	0.0	0.1	0.3	0.1	0.2	0.3	0.2	0.2	2.0	1.0	1.0	0.8	0.1	0.1	0.4	0.3	0.1	0.4	0.2	0.8	0.1	0.2	0.4	0.0	0.4
	% CMS Downtime	0.0	0.4	0.4	0.8	1.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	0.1	0.2	0.1	0.0	0.1	0.1	0.0	0.1	0.0	0.2	0.1	0.1	0.1	0.1	0.2	0.1
	Total Percent	0.1	0.6	0.6	0.9	1.3	0.1	0.3	0.1	0.2	0.3	0.2	0.2	3.0	1.1	1.2	0.9	0.1	0.2	0.5	0.3	0.2	0.4	0.4	0.9	0.2	0.3	0.5	0.2	0.6
Crist 6	% Excess emissions	0.5	0.9	1.1	1.1	0.6	0.8	1.0	1.8	0.9	1.2	0.2	0.2	0.1	0.1	0.2	0.1	0.0	0.1	0.0	0.1	0.1	0.1	0.2	0.1	0.1	0.1	0.0	0.1	0.2
	% CMS Downtime	0.0	0.2	0.0	1.5	1.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.1	0.0	0.0	0.0	0.1	0.0	0.4	0.0	0.1	0.1	0.0	0.1
	Total Percent	0.5	1.1	1.1	2.6	1.6	0.9	1.0	1.8	0.9	1.2	0.2	0.2	0.1	0.1	0.2	0.3	0.0	0.2	0.0	0.1	0.1	0.2	0.2	0.5	0.1	0.2	0.1	0.1	0.3
Crist 7	% Excess emissions	0.3	0.8	1.9	1.2	0.1	0.1	0.6	0.8	0.4	0.4	0.2	0.5	0.4	0.5	0.3	0.3	0.4	0.2	0.3	0.3	1.0	2.1	0.3	0.5	2.2	0.2	0.8	0.2	0.6
	% CMS Downtime	0.0	0.0	0.6	2.8	0.8	0.0	0.0	0.0	0.0	0.2	0.5	0.3	0.0	0.1	0.0	0.1	0.1	0.7	0.4	0.0	0.0	0.4	0.0	0.1	0.1	0.0	0.0	0.1	0.2
	Total Percent	0.3	0.8	2.5	4.0	0.9	0.1	0.6	0.8	0.4	0.6	0.7	0.8	0.4	0.6	0.3	0.4	0.5	0.9	0.7	0.3	1.0	2.5	0.3	0.6	2.3	0.2	0.8	0.3	0.7





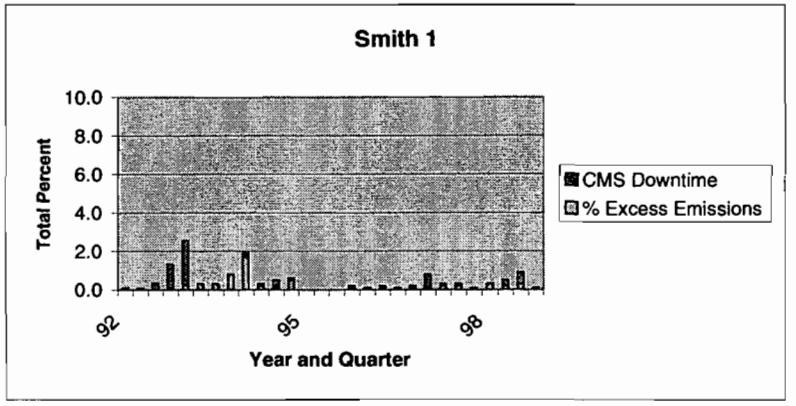
* High percentage for Crist 4 in 4th Quarter 1993 due to short running time due to outage

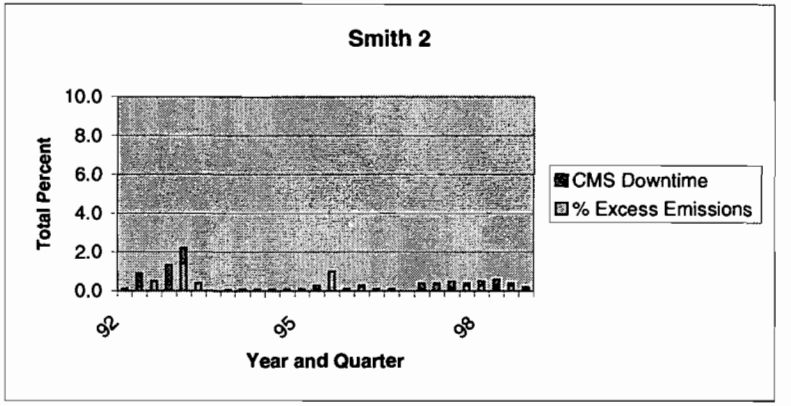


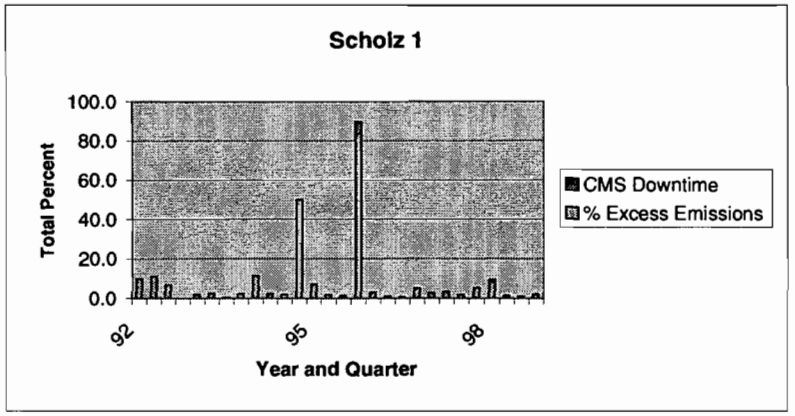


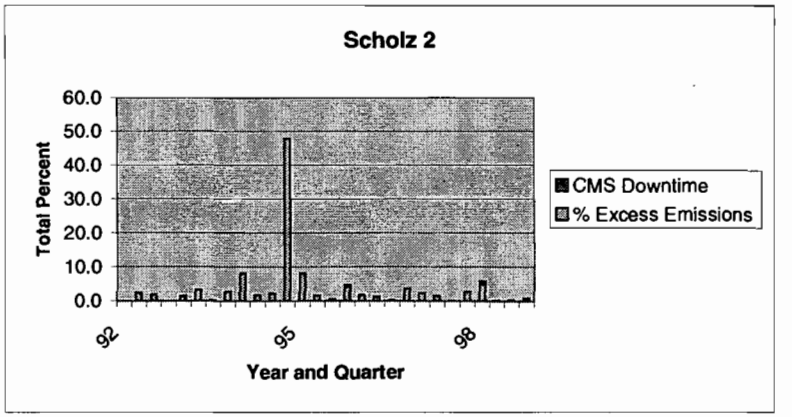
Opacity Excess Emissions Report for Smith and Scholz (1992-1997)

Year		92				93				94				95				96				97				98				5 Year Avg.
Quarter		1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	
Smith 1	% Excess emissions	0.1	0.1	0.0	0.0	0.3	0.3	0.3	0.8	1.7	0.2	0.0	0.5	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.1	0.1	0.2	0.2	0.0	0.3	0.2	0.3	0.0	0.2
	% CMS Downtime	0.0	0.0	0.3	1.3	2.3	0.0	0.0	0.0	0.2	0.1	0.5	0.1	0.0	0.0	0.0	0.1	0.1	0.1	0.1	0.1	0.7	0.1	0.1	0.1	0.0	0.3	0.6	0.1	0.2
	Total Percent	0.1	0.1	0.3	1.3	2.6	0.3	0.3	0.8	1.9	0.3	0.5	0.6	0.0	0.0	0.0	0.2	0.1	0.2	0.1	0.2	0.8	0.3	0.3	0.1	0.3	0.5	0.9	0.1	0.4
Smith 2	% Excess emissions	0.1	0.2	0.5	0.0	1.4	0.4	0.0	0.1	0.1	0.0	0.1	0.0	0.1	0.1	1.0	0.0	0.2	0.0	0.1	0.0	0.1	0.0	0.1	0.3	0.3	0.1	0.3	0.1	0.2
	% CMS Downtime	0.0	0.7	0.0	1.3	0.8	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.2	0.0	0.1	0.1	0.1	0.0	0.0	0.3	0.4	0.4	0.1	0.2	0.5	0.1	0.1	0.1
	Total Percent	0.1	0.9	0.5	1.3	2.2	0.4	0.0	0.1	0.1	0.1	0.1	0.1	0.1	0.3	1.0	0.1	0.3	0.1	0.1	0.0	0.4	0.4	0.5	0.4	0.5	0.6	0.4	0.2	0.3
Scholz 1	% Excess emissions	9.8	11.1	6.8	N/A	1.7	2.4	0.3	2.2	11.3	2.3	1.8	50.0	7.2	1.7	1.0	83.6	3.0	0.8	0.5	5.1	2.7	3.3	1.7	5.3	8.4	1.3	1.0	2.0	9.7
	% CMS Downtime	0.0	0.0	0.0	N/A	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	6.1	0.0	0.2	0.1	0.0	0.0	0.1	0.1	0.0	0.9	0.1	0.0	0.2	0.4
	Total Percent	9.8	11.1	6.8	N/A	1.9	2.4	0.3	2.2	11.3	2.3	1.8	50.0	7.2	1.7	1.1	89.7	3.0	1.0	0.6	5.1	2.7	3.4	1.8	5.3	9.3	1.4	1.0	2.2	10.1
Scholz 2	% Excess emissions	0.0	2.4	1.9	N/A	1.2	3.3	0.3	2.8	8.1	1.7	2.1	47.8	8.1	1.6	0.5	4.1	1.7	1.0	0.2	3.6	2.3	1.4	0.1	2.8	4.9	0.2	0.3	0.8	4.7
	% CMS Downtime	0.0	0.0	0.0	N/A	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.6	0.1	0.2	0.1	0.0	0.0	0.1	0.0	0.0	0.9	0.1	0.1	0.1	0.1
	Total Percent	0.0	2.4	1.9	N/A	1.5	3.3	0.3	2.8	8.1	1.7	2.1	47.8	8.1	1.6	0.5	4.7	1.8	1.2	0.3	3.6	2.3	1.5	0.1	2.8	5.8	0.3	0.4	0.9	4.8





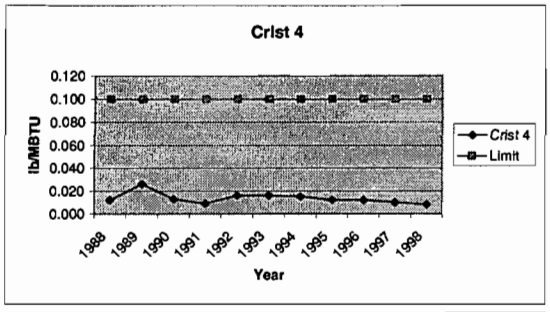


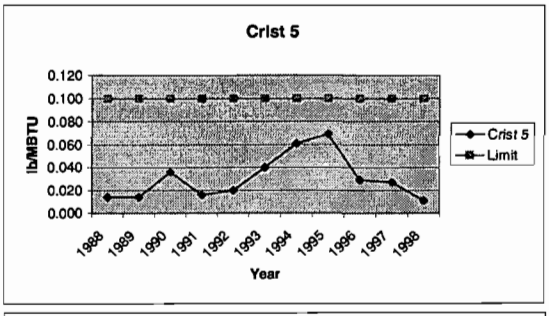


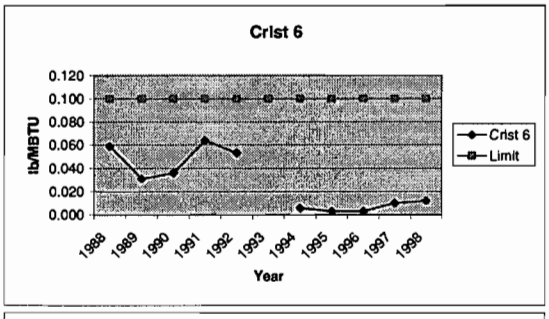
*High Scholz Percentages due to low source operating time; peaking units only.

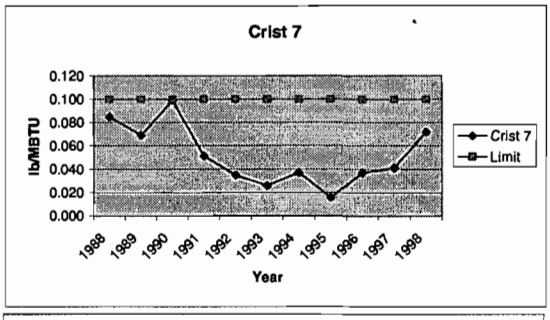
Gulf Power Emissons Summary for Steady State Particulate Emissions (in lb/MBTU)

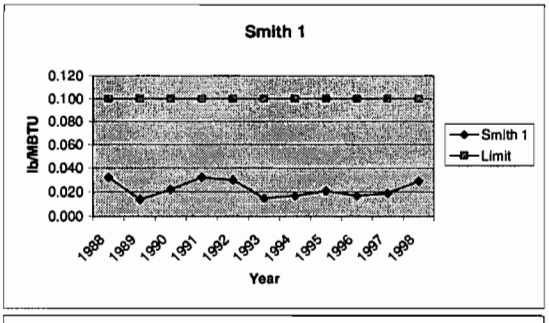
Unit	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	5 Year Avg
Limit	0.100	0.100	0.100	0.100	0.100	0.100	0.100	0.100	0.100	0.100	0.100	0.100
Crist 4	0.012	0.026	0.013	0.009	0.016	0.016	0.015	0.012	0.012	0.010	0.008	0.011
Crist 5	0.014	0.014	0.036	0.016	0.020	0.040	0.061	0.069	0.029	0.027	0.011	0.039
Crist 6	0.059	0.031	0.036	0.064	0.053		0.006	0.003	0.003	0.010	0.012	0.007
Crist 7	0.085	0.069	0.099	0.051	0.035	0.026	0.037	0.016	0.037	0.041	0.072	0.041
Smith 1	0.032	0.014	0.022	0.032	0.030	0.015	0.017	0.021	0.017	0.019	0.029	0.021
Smith 2	0.013	0.038	0.027	0.050	0.034	0.006	0.021	0.015	0.028	0.025	0.049	0.028
Scholz 1	0.011	0.008	0.011	0.038	0.011	0.008	0.018	0.023	0.035	0.024	0.016	0.023
Scholz 2	0.015	0.015	0.011	0.041	0.009	0.011	0.020	0.013	0.016	0.013	0.010	0.014

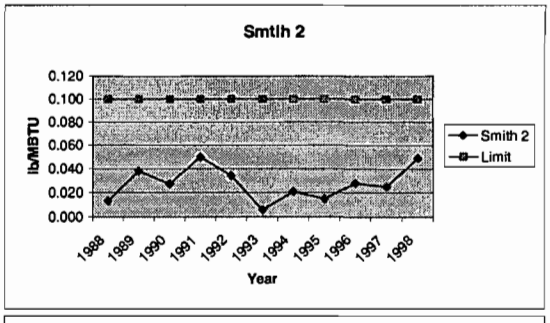


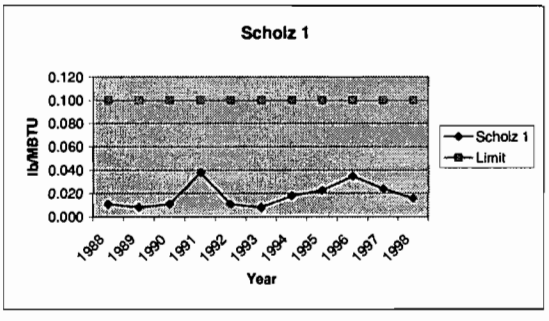


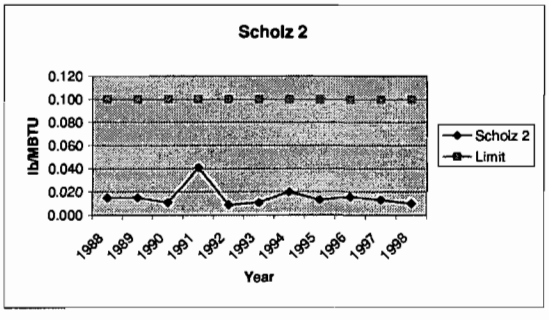






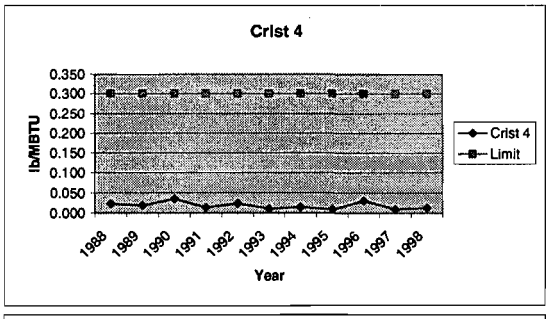


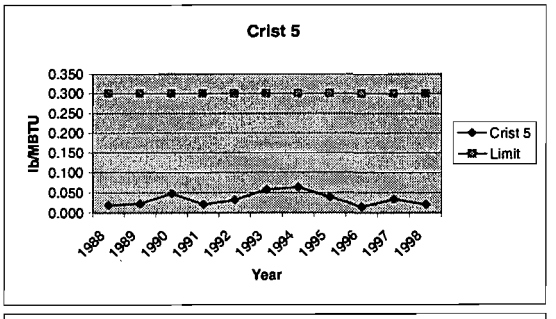


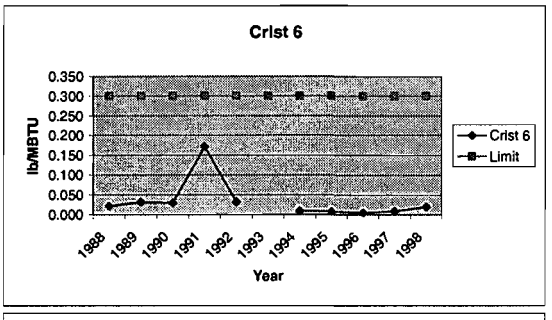


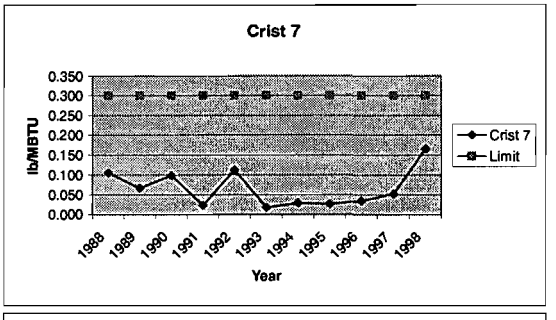
Gulf Power Emissons Summary for Soot Blowing Particulate Emissions (in lb/MBTU)

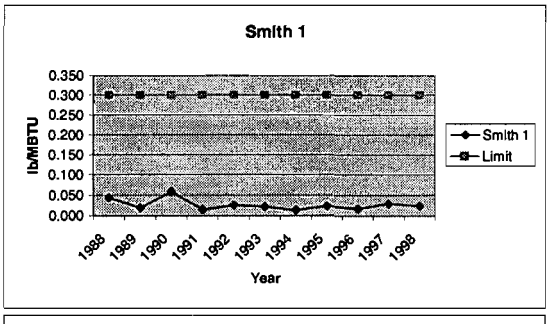
Unit	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	5 Year Avg
Limit	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300	0.300
Crist 4	0.023	0.019	0.035	0.014	0.024	0.011	0.015	0.009	0.031	0.010	0.013	0.016
Crist 5	0.019	0.023	0.048	0.021	0.032	0.058	0.064	0.039	0.015	0.034	0.021	0.035
Crist 6	0.022	0.032	0.030	0.172	0.032		0.010	0.008	0.005	0.009	0.020	0.010
Crist 7	0.106	0.067	0.099	0.024	0.113	0.018	0.029	0.027	0.035	0.053	0.166	0.062
Smith 1	0.044	0.019	0.059	0.015	0.025	0.022	0.013	0.024	0.017	0.029	0.024	0.021
Smith 2	0.016	0.037	0.053	0.031	0.025	0.009	0.019	0.016	0.050	0.040	0.028	0.031
Scholz 1	0.012	0.011	0.016	0.021	0.015	0.013	0.035	0.014	0.035	0.054	0.025	0.033
Scholz 2	0.013	0.009	0.013	0.029	0.016	0.008	0.044	0.016	0.018	0.014	0.018	0.022

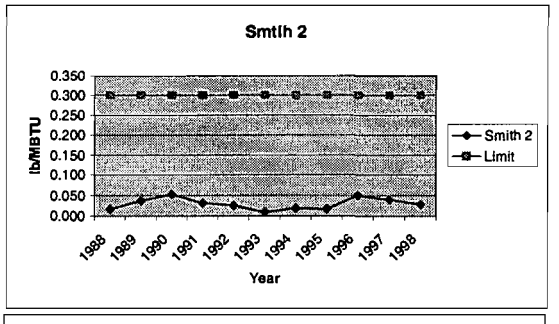


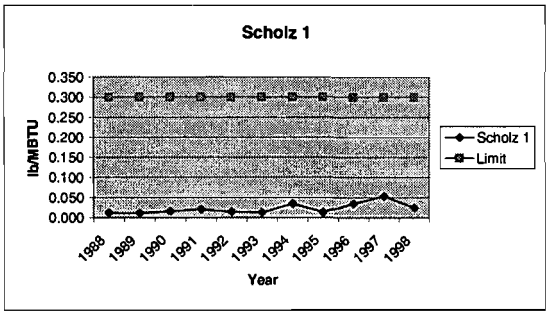


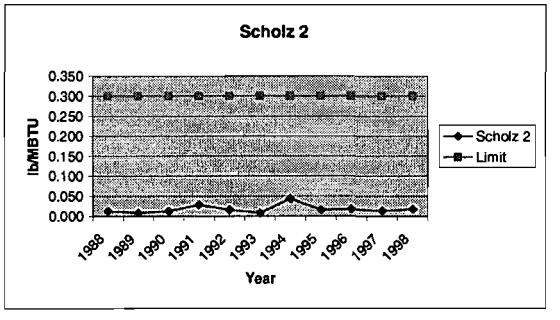












8/26 Scott
Need to copy them on notices of intent.
On any we have already sent
Send them a copy of intent pack
Clair - pls handle Clair
[illegible]

LEAF
LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION

August 13, 1997

Howard Rhodes, Bureau Chief
Bureau of Air Resources
Florida Dept. of Env. Protection
2600 Blairstone Rd, MS 5500
Tallahassee, FL 32399

Re: Title V Permits

Dear Mr. Rhodes:

We understand the Bureau is reviewing applications for operating permits pursuant to DEP's authority to administer the Title V program. We are interested in potential permits for Florida's electric utilities, particularly Florida Power & Light, Florida Power Corp., Gulf Power Co., and Tampa Electric Co.

We would like to be added to any list of interested persons to whom notices of intent to issue or deny permits are sent. We would also like to know what opportunities there are for public comment on proposed permits. In addition, if there is a list of pending permits, we would be grateful for a copy. Thank you for your assistance.

Sincerely,

Gail Kamaras

Gail Kamaras, Director
Energy Advocacy Program

RECEIVED
AUG 15 1997
BUREAU OF
AIR REGULATION

A Public Interest Law Firm
1115 NORTH GADSDEN STREET • TALLAHASSEE, FLORIDA • 32303-6327 • 904-681-2591 • FAX 904-224-1275 *Recycled Paper*

$1229 \frac{\text{MMBTU}}{\text{hr}} \times 8760 \frac{\text{hr}}{\text{yr}} = 10,760,040 \frac{\text{MMBTU}}{\text{yr}} \times 6.17 \frac{\text{lb}}{\text{MMBTU}} = 33,213 \text{ TPY } SO_2$

$1768 \times 8760 = 15,487,680 \frac{\text{MMBTU}}{\text{yr}} \times 6.17 = 47,779.5 \text{ TPY}$

$+ 14566.5 \text{ TPY}$

1406 → 37,996

2042 → 55189 TPY

$+ 17,188 \quad + 14566.5 = +31755 \text{ TPY}$

Per Coral Melter, actual SO_2 @ Smith:

1985 → 1992 $+ 40,000 \text{ TPY } SO_2$

1992 – 1995 $- 40,000 \text{ TPY } SO_2$

Net increase of 30,000 TPY

From 1985 → 1995

Appendix H-1, Permit History/ID Number Changes

(For Tracking Purposes Only)

Gulf Power Company
Lansing Smith Plant

Permit No.: 0050014-001-AV
Facility ID No.: 0050014

E.U. ID No	Description	Permit No.	Issue Date	Expiration Date	Extended Date	Revised Date(s)	MW Output	Heat Input (MMBtu/hr)
-001	Lansing Smith #1 - Stack	AO03-211310	04/17/92	04/01/97			175	(1,768) [1,2]
		AO03-134885	07/09/87	06/01/92			175	(1,768) [1, 2]
		AO03-56886	07/15/82	07/01/87			175	(1,566) [1, 3]
		Secretarial ORDER [4]	10/18/85					
		Secretarial ORDER [5]	12/07/82					
		AO03-2031	08/17/77	08/17/82			N/S	1,556
		AC03-2023	02/10/75	01/01/77	05/15/77		N/S	1,229
		AO-3-1133	01/29/73	12/15/74			130	1,300
-002	Lansing Smith #2 - Stack	AO03-211310	04/17/92	04/01/97			205	(2,042) [1,2]
		AO03-134887	07/09/87	06/01/92			205	(2,042) [1,2]
		AO03-56888	07/15/82	07/01/87			205	(1,974) [1, 3]
		Secretarial ORDER [4]	10/18/85					
		Secretarial ORDER [5]	12/07/82					
		AO03-7636	03/22/78	03/22/83			N/S	1,924
		AC03-2024	02/10/75	01/01/77	05/15/77		N/S	1,404
		AO-3-1132	01/29/73	12/15/74			140.75	1,406
-003	Peaking Turbines	AO03-249657	05/19/94	01/15/96				

ID Number Changes (for tracking purposes):

From: **Facility ID No.**: 10PCY030014
To: **Facility ID No.**: 0050014

[1] Number in parenthsis indicates number reported in application, not specified in the permit.
[2] "Maximum allowable heat input is that heat input necessary to maintain electrical load output at 110% of the level at which the most recent successful particulate matter compliance test was conducted."
[3] "Maximum allowable heat input is that heat input necessay to maintain electrical load output at the level at which the most recent successful quarterly particulate matter test was conducted."
[4] Secretarial ORDER issued to relax semi-annual PM testing requirement to annual.
[5] Secretarial ORDER issued to relax quarterly PM testing requirement to semi-annual.

F-Factor

Carbon, O_2, S_2, H_2 Content of fuel

~~each~~ determine gravity of gas & analyze for B.T.U.

Requested Emission Rates and Stack Parameters for Gulf Power Scholz

Emission Units	Emission Rate (g/s)	Stack Height (m)	Stack Temp °K	Stack Vel (m/s)	Stack Diameter (m)
Unit 1&2 Coal Fired	1004.0	45.72	439	12.3	4.11

Location of Emission Units in Scholz

Emission Units	x (m)	y (m)
No.1&2	0.0	0.0

Requested Heat Inputs and SO_2 emission rates in lb/MMBTU and lb/hour

Emission Units	Maximum Heat Input MMBTU/hr	Controlled SO_2 Em Rate (lb/MMBTU)	Requested Emission Rate (lb/hr)
No.1	645.7	6.17	3984.0
No.2	645.7	6.17	3984.0
Total 1 & 2	1291.4	6.17	7967.9

MODEL RESULTS SCHOLZ

(All Values in ug/m^3)

	MET DATA	ANNUAL			H2h 24-HOUR			H2h-3 HOUR		
		AAQS=60			AAQS=260			AAQS=1330		
		CONC	RECEP		CONC	RECEP		CONC	RECEP	
1985	TALLAHASSEE	20	360	2.5	327	170	0.25	**1500**	230	0.25
1986	TALLAHASSEE	29	190	2.75	244	190	2.0	931	190	0.25
1987	TALLAHASSEE	**52**	190	2.5	**340**	330	0.25	1395	330	0.25
1987	TALLAHASSEE				335	200	3.75			
1988	TALLAHASSEE	45	190	2.5	310	300	1.75	1301	330	2.5
1989	TALLAHASSEE	25	360	2.5	277	60	2.25	1116	360	0.25

Files: Schzdw.o85 through Schzdw.o89

500 Bayfront Parkway
Pensacola, FL 32520

Tel 904.444.6000

GULF POWER
A SOUTHERN COMPANY

April 7, 1997

Mr. Scott M. Sheplak
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Sheplak:

Re: GULF POWER COMPANY TITLE V APPLICATION REVISION
GULF POWER COMPANY ACID RAIN PHASE II APPLICATION REVISION
PLANT CRIST, PLANT SCHOLZ, PLANT LANSING SMITH

Gulf Power Company hereby requests a revision of our active Acid Rain Phase II and Title V permit applications on file with the Florida Department of Environmental Protection. Our request is pursuant to a change of the "Designated Representative" for Gulf Power under the Acid Rain Program. These revisions (3) were submitted to the Environmental Protection Agency on April 3, 1997 as required under 40 CFR 72.24 of the Clean Air Act Amendments of 1990. Copies are attached for your review. Please update Gulf Power's active Acid Rain Phase II and Title V permit applications for Plant Crist, Plant Scholz and Plant Lansing Smith regarding this change.

If you have questions or need further information regarding the Designated Representative under the Acid Rain Program, please call me at (904) 444-6527.

Sincerely,

Dwain Waters

G. Dwain Waters
Air Quality Programs Coordinator, QEP

Attachments (3)
See Distribution Sheet

DISTRIBUTION SHEET

cc w/oatt: G. Edison Holland, Jr, Gulf Power Company
J. O. Vick, Gulf Power Company
J. M. Dominey, Gulf Power Company
S. H. Houston, Gulf Power Company
K. Peacock, Gulf Power Company
C. R. Lee, Gulf Power Company
Joseph W. Martin, Gulf Power Company
Lewis A. Jeffers, Gulf Power Company

cc: w/att: K. F. Kosky, KBN Engineering
Angela Morrison, Hopping, Green, Sams & Smith
Danny Herrin, Southern Company Services

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0221
Expires 1-31-96

Certificate of Representation

For more information, see instructions and refer to 40 CFR 72.24

This submission is: ☐ New ☒ Revised

This submission includes combustion or process sources under 40 CFR part 74 ☐

STEP 1
Identify the source by plant name, State, and, if applicable, ORIS code from NADB.

Plant Name	State	ORIS Code
Crist Electric Generating Plant	FL	641

STEP 2
Enter requested information for the designated representative.

Name: G. Edison Holland, Jr.	
Address: 500 Bayfront Parkway Pensacola, Florida 32520-0100	
Phone Number: (904) 444-6393	Fax Number: (904) 444-6744

STEP 3
Enter requested information for the alternate designated representative, if applicable.

Name	
Address	
Phone Number	Fax Number

STEP 4
Complete Step 5, read the certifications, and sign and date. For a designated representative of a combustion or process source under 40 CFR part 74, the references in the certifications to "affected unit" or "affected units" also apply to the combustion or process source under 40 CFR part 74 and the references to "affected source" also apply to the source at which the combustion or process source is located.

I certify that I was selected as the designated representative or alternate designated representative, as applicable, by an agreement binding on the owners and operators of the affected source and each affected unit at the source.

I certify that I have given notice of the agreement, selecting me as the designated representative or alternate designated representative, as applicable, for the affected source and each affected unit at the source identified in this certificate of representation, daily for a period of one week in a newspaper of general circulation in the area where the source is located or in a State publication designed to give general public notice.

I certify that I have all necessary authority to carry out my duties and responsibilities under the Acid Rain Program on behalf of the owners and operators of the affected source and of each affected unit at the source and that each such owner and operator shall be fully bound by my actions, inactions, or submissions.

I certify that I shall abide by any fiduciary responsibilities imposed by the agreement by which I was selected as designated representative or alternate designated representative, as applicable.

I certify that the owners and operators of the affected source and of each affected unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, an affected unit, or where a utility or industrial customer purchases power from an affected unit under life-of-the-unit, firm power contractual arrangements, I certify that:

I have given a written notice of my selection as the designated representative or alternate designated representative, as applicable, and of the agreement by which I was selected to each owner and operator of the affected source and of each affected unit at the source; and

Allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement or, if such multiple holders have expressly provided for a different distribution of allowances by contract, that allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in accordance with the contract.

BEST AVAILABLE COPY

Crist Electric Generating Plant
Plant Name (from Step 1)

The agreement by which I was selected as the alternate designated representative, if applicable, includes a procedure for the owners and operators of the source and affected units at the source to authorize the alternate designated representative to act in lieu of the designated representative.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Signature (designated representative) [signature]	Date 4/2/97
Signature (alternate designated representative)	Date

STEP 5
Provide the name of every owner and operator of the source and each affected unit (or combustion or process source) at the source. Identify the units they own and/or operate by boiler ID# from NADB, if applicable. For owners only, identify each state or local utility regulatory authority with ratemaking jurisdiction over each owner, if applicable.

Name Crist Electric Generating Plant					☐ Owner	☒ Operator
ID# 1	ID# 2	ID# 3	ID# 4	ID# 5	ID# 6	ID# 7
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities Florida Public Service Commission						

Name					☐ Owner	☐ Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities						

Name					☐ Owner	☐ Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities						

Name					☐ Owner	☐ Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#
Regulatory Authorities						

Phase II Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission is: [X] New [ ] Revised

STEP 1
Identify the source by plant name, State, and ORIS code from NADB

Plant Name	State	ORIS Code
Crist	FL	641

STEP 2
Enter the boiler ID# from NADB for each affected unit, and indicate whether a repowering plan is being submitted for the unit by entering "yes" or "no" at column c. For new units, enter the requested information in columns d and e

	Compliance Plan			
a	b	c	d	e
Boiler ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	Repowering Plan	New Units Commence Operation Date	New Units Monitor Certification Deadline
1	Yes	No		
2	Yes	No		
3	Yes	No		
4	Yes	No		
5	Yes	No		
6	Yes	No		
7	Yes	No		
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			

STEP 3
Check the box if the response in column c of Step 2 is "Yes" for any unit

[ ] For each unit that will be repowered, the Repowering Extension Plan form is included and the Repowering Technology Petition form has been submitted or will be submitted by June 1, 1997.

Plant Name (from Step 1)

STEP 4
Read the standard requirements and certification, enter the name of the designated representative, and sign and date

Standard Requirements

Permit Requirements.

(1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
(i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72, Rules 62-214.320 and 330, F.A.C. in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain permit;
(2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
(i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the permitting authority; and
(ii) Have an Acid Rain Part.

Monitoring Requirements.

(1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
(2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
(3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

(1) The owners and operators of each source and each Acid Rain unit at the source shall:
(i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
(3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
(i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
(ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(i) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

(1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
(2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
(ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
(i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
(ii) All emissions monitoring information, in accordance with 40 CFR part 75;
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

Plant Name (from Step 1)

Recordkeeping and Reporting Requirements (cont.)

(iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
(4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
(5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
(6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
(7) Each violation of a provision of 40 CFR parts 72, 73, 75, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities. No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
(2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name M. L. Gilchrist	
Signature M L Gilchrist	Date 12/8/95

STEP 5 (optional)
Enter the source AIRS and FINDS identification numbers, if known

AIRS
FINDS

Gulf Power Company
500 Bayfront Parkway
Post Office Box 1151
Pensacola, FL 32520
Telephone 904 444-6111

Gulf Power
the southern electric system

November 26, 1996

Mr. John Brown
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Brown:

Re: GULF POWER COMPANY TITLE V APPLICATION UPDATE:
CRIST 1,2,3 OPERATING PERMIT

In reviewing the Title V Application for Gulf Power's Crist Plant, I found the most recent copy of the operating permit for Crist Units 1, 2, and 3 was inadvertently not included. Enclosed are four copies of this more recent operating permit issued May 19,1994. Please update the EUS-12 section of Plant Crist's Title V Application with these copies.

If you have any questions concerning this update, please call me at (904) 444-6527.

Sincerely,

Dwain Waters

Dwain Waters, QEP
Air Quality Programs Coordinator

Enclosures

cc w/att: J. O. Vick, Gulf Power Company
J. M. Dominey, Gulf Power Company
K. F. Kosky, KBN Engineering

cc w/o att: G. Edison Holland, Jr., Gulf Power Company
C. R. Lee, Gulf Power Company
Joseph W. Martin, Gulf Power Company
Angela Morrison, Hopping, Green, Sams & Smith
Danny Herrin, Southern Company Services

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: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996
County: Escambia
Latitude/Longitude: 33°32'58"N/87°13'44"W
Project: Crist Boilers 1, 2, 3

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:

Operation of Boilers 1, 2, and 3 with maximum rated heat inputs of 320, 320, and 550 MMBtu/hour, respectively. These boilers are primarily fueled with natural gas, with fuel oil as a standby fuel. Emissions are generally controlled by proper combustion; when operating with fuel oil, SO_2 emissions are controlled by the sulfur content of the fuel oil.

Operation of this source shall be consistent with the operation permit application dated April 15, 1994.

Located at the Crist Plant, Governor's Bayou, north of Pensacola.

Specific Condition No. 2 establishes maximum allowable operating and testing rates.

Specific Condition No. 6 establishes emission limits.

Specific Condition No. 7 establishes compliance testing requirements.

Specific Condition No. 9 requires submission of an annual operation report.

Specific Condition No. 10 requires submission of a Major Air Pollution Source Annual Operation Fee Form.

Specific Condition No. 11 requires submission of a Title V renewal application.

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996

SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit. (FAC Rule 17-4.160)

Operation

2. The maximum allowable operating rates are 320, 320, and 550 MMBtu heat input per hour for Boiler 1, 2, and 3, respectively. These are the operating rates at which compliance with standards shall be demonstrated. Testing of emissions shall be conducted with the sources operating at capacity. Capacity is defined as 90 to 100% of rated capacity. If it is impracticable to test at capacity, then sources may be tested at less than capacity; if the sources are tested at less than capacity, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once a unit is so limited, then operation at higher capacity is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. (FAC Rule 17-4.070)

3. The maximum hours of operation are 24 hours/day, 7 days/week, and 52 weeks/year. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually. (Application dated April 15, 1994)

4. The maximum sulfur content of the back up fuel oil is limited to that percentage necessary to meet the SO_2 emission limit of 1.98 lbs/MMBtu heat input. The Permittee shall maintain a log available for Department inspection of the fuel oil sulfur content. (FAC Rule 17-4.070)

5. Satisfactory ladders, platforms, and other safety devices as well as necessary parts shall be provided, maintained, and made available as necessary to facilitate compliance inspections. (FAC Rule 17-297.345)

Emissions

6. The maximum allowable emission limit for each pollutant is as follows:

Pollutant	FAC Rule	Allowable Emissions
VE	17-296.405	20% opacity*
PM	17-296.405	0.1 lb/MMBtu heat input
SO_2	17-296.405	1.98 lbs/MMBtu heat input

* except for one two-minute period/hour of up to 40% percent opacity

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996

SPECIFIC CONDITIONS:

Testing

7. Emissions tests for the following pollutants shall be performed between October 1 and November 30, in accordance with the test methods and frequency indicated, with notification to the Department 15 days prior to testing. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. For good cause, the Permittee may request an extension of a compliance test due date. However, inadequate planning of testing does not constitute good cause for an extension of the compliance test due date. The test report documentation must be submitted to the Department within 45 days after completion of testing.

Pollutant	Frequency	Test Method	Reference
VE	annually	DEP No. 9	FAC Rule 17-296.405
	annually during excess emissions when applicable	DEP No. 9	
PM	annually	EPA No. 5	FAC Rule 17-296.405
	annually during excess emissions when applicable	EPA No. 5	FAC Rule 17-296.405

No particulate emissions test is required in any year during which the specific source did not burn fuel oil for more than 400 hours other than during startup.

The VE test shall be for a duration of sixty minutes and shall be conducted during one of the P.M. test runs if a P.M. test is conducted. 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).

Administrative

8. Boilers 1, 2, 3, 4 and 5 use a common stack. Visible emissions violations from this stack shall be attributed to all boilers unless the opacity meter results identify the specific boiler causing the excess visible emissions.

9. An annual operation report [DEP Form 17-210.900(4) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the Permittee and used for future annual submittals. (FAC Rule 17-210.370)

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996

SPECIFIC CONDITIONS:

10. In accordance with F.A.C. Rule 17-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 17-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the Permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

11. An application to renew this permit shall be submitted as required for a Title V permit. (FAC Rule 17-210)

12. The permanent source identification numbers for these point sources are:

10PEN17004501 - Boiler 1
10PEN16004502 - Boiler 2
10PEN17004503 - Boiler 3

Please cite these numbers on all test reports and other correspondence specific to these permitted point sources. (FAC Rule 17-297.570)

13. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, use telephone number (904) 444-8300 during normal working hours. (FAC Rule 17-210.700)

Expiration Date:

January 15, 1996

Issued this 19th day of May, 1994.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

BOBBY A. COOLEY
District Director

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Expiration Date: January 15, 1996

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, 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 any vested rights or any exclusive privileges. Nor 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 does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in 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 and used by the Permittee to achieve compliance with the conditions of this permit, are 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

a. Having access to and copying any records that must be kept under the conditions of this permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,

GENERAL CONDITIONS:

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

8. If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with 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 17-4.120 and 17-730.300, as applicable. The Permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. The Permittee shall comply with the following:

a. Upon request, the Permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The Permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous

monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurement;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. 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 the 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 PERMIT ISSUANCE

CERTIFIED MAIL

In the matter of an
Application for Permit
By:
M. L. Gilchrist
Manager of Fuel & Environmental Affairs
Gulf Power Company
Post Office Box 1151
Pensacola, Florida 32520-0328

DEP File No. AO17-249656
Escambia County

Enclosed is Permit Number AO17-249656 to operate Crist Boiler Units 1, 2 and 3, issued pursuant to Section 403.087, Florida Statutes.

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 2600 Blair Stone Road, Tallahassee 32399-2400, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department 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 Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose

substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, 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 Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Pensacola, Florida.

State of Florida Department
of Environmental Protection

BOBBY A. COOLEY
District Director

160 Governmental Center
Pensacola, Florida 32501-5794
(904) 444-8300

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE and all copies were mailed by certified mail before the close of business on MAY 20, 1994 to the listed persons.

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52(9),
Florida Statutes, with the designated
Department clerk, receipt of which is
hereby acknowledged.

Clerk 5/20/94
Date

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: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996
County: Escambia
Latitude/Longitude: 33°32'58"N/87°13'44"W
Project: Crist Boilers 1, 2, 3

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:

Operation of Boilers 1, 2, and 3 with maximum rated heat inputs of 320, 320, and 550 MMBtu/hour, respectively. These boilers are primarily fueled with natural gas, with fuel oil as a standby fuel. Emissions are generally controlled by proper combustion; when operating with fuel oil, SO_2 emissions are controlled by the sulfur content of the fuel oil.

Operation of this source shall be consistent with the operation permit application dated April 15, 1994.

Located at the Crist Plant, Governor's Bayou, north of Pensacola.

Specific Condition No. 2 establishes maximum allowable operating and testing rates.

Specific Condition No. 6 establishes emission limits.

Specific Condition No. 7 establishes compliance testing requirements.

Specific Condition No. 9 requires submission of an annual operation report.

Specific Condition No. 10 requires submission of a Major Air Pollution Source Annual Operation Fee Form.

Specific Condition No. 11 requires submission of a Title V renewal application.

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996

SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit. (FAC Rule 17-4.160)

Operation

2. The maximum allowable operating rates are 320, 320, and 550 MMBtu heat input per hour for Boiler 1, 2, and 3, respectively. These are the operating rates at which compliance with standards shall be demonstrated. Testing of emissions shall be conducted with the sources operating at capacity. Capacity is defined as 90 to 100% of rated capacity. If it is impracticable to test at capacity, then sources may be tested at less than capacity; if the sources are tested at less than capacity, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once a unit is so limited, then operation at higher capacity is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. (FAC Rule 17-4.070)

3. The maximum hours of operation are 24 hours/day, 7 days/week, and 52 weeks/year. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually. (Application dated April 15, 1994)

4. The maximum sulfur content of the back up fuel oil is limited to that percentage necessary to meet the SO_2 emission limit of 1.98 lbs/MMBtu heat input. The Permittee shall maintain a log available for Department inspection of the fuel oil sulfur content. (FAC Rule 17-4.070)

5. Satisfactory ladders, platforms, and other safety devices as well as necessary parts shall be provided, maintained, and made available as necessary to facilitate compliance inspections. (FAC Rule 17-297.345)

Emissions

6. The maximum allowable emission limit for each pollutant is as follows:

Pollutant	FAC Rule	Allowable Emissions
VE	17-296.405	20% opacity*
PM	17-296.405	0.1 lb/MMBtu heat input
SO_2	17-296.405	1.98 lbs/MMBtu heat input

* except for one two-minute period/hour of up to 40% percent opacity

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996

SPECIFIC CONDITIONS:

Testing

7. Emissions tests for the following pollutants shall be performed between October 1 and November 30, in accordance with the test methods and frequency indicated, with notification to the Department 15 days prior to testing. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. For good cause, the Permittee may request an extension of a compliance test due date. However, inadequate planning of testing does not constitute good cause for an extension of the compliance test due date. The test report documentation must be submitted to the Department within 45 days after completion of testing.

Pollutant	Frequency	Test Method	Reference
VE	annually	DEP No. 9	FAC Rule 17-296.405
	annually during excess emissions when applicable	DEP No. 9	
PM	annually	EPA No. 5	FAC Rule 17-296.405
	annually during excess emissions when applicable	EPA No. 5	FAC Rule 17-296.405

No particulate emissions test is required in any year during which the specific source did not burn fuel oil for more than 400 hours other than during startup.

The VE test shall be for a duration of sixty minutes and shall be conducted during one of the P.M. test runs if a P.M. test is conducted. 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).

Administrative

8. Boilers 1, 2, 3, 4 and 5 use a common stack. Visible emissions violations from this stack shall be attributed to all boilers unless the opacity meter results identify the specific boiler causing the excess visible emissions.

9. An annual operation report [DEP Form 17-210.900(4) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the Permittee and used for future annual submittals. (FAC Rule 17-210.370)

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996

SPECIFIC CONDITIONS:

10. In accordance with F.A.C. Rule 17-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 17-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the Permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

11. An application to renew this permit shall be submitted as required for a Title V permit. (FAC Rule 17-210)

12. The permanent source identification numbers for these point sources are:

10PEN17004501 - Boiler 1
10PEN16004502 - Boiler 2
10PEN17004503 - Boiler 3

Please cite these numbers on all test reports and other correspondence specific to these permitted point sources. (FAC Rule 17-297.570)

13. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, use telephone number (904) 444-8300 during normal working hours. (FAC Rule 17-210.700)

Expiration Date:

January 15, 1996

Issued this 19th day of May, 1994.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

BOBBY A. COOLEY
District Director

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Expiration Date: January 15, 1996

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, 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 any vested rights or any exclusive privileges. Nor 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 does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in 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 and used by the Permittee to achieve compliance with the conditions of this permit, are 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

a. Having access to and copying any records that must be kept under the conditions of this permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,

PERMITTEE:

Gulf Power Company

I.D. Number: 10PEN17004501,02,03
Permit/Certification Number: AO17-249656
Expiration Date: January 15, 1996

GENERAL CONDITIONS:

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

8. If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with 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 17-4.120 and 17-730.300, as applicable. The Permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. 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

GENERAL CONDITIONS:

monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurement;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. 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 the 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 PERMIT ISSUANCE

CERTIFIED MAIL

In the matter of an
Application for Permit
By:
M. L. Gilchrist
Manager of Fuel & Environmental Affairs
Gulf Power Company
Post Office Box 1151
Pensacola, Florida 32520-0328

DEP File No. AO17-249656
Escambia County

Enclosed is Permit Number AO17-249656 to operate Crist Boiler Units 1, 2 and 3, issued pursuant to Section 403.087, Florida Statutes.

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 2600 Blair Stone Road, Tallahassee 32399-2400, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department 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 Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose

substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, 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 Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Pensacola, Florida.

State of Florida Department
of Environmental Protection

BOBBY A. COOLEY
District Director

160 Governmental Center
Pensacola, Florida 32501-5794
(904) 444-8300

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE and all copies were mailed by certified mail before the close of business on MAY 20, 1994 to the listed persons.

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52(9),
Florida Statutes, with the designated
Department clerk, receipt of which is
hereby acknowledged.

5/20/94

Clerk Date

(FOR INTERNAL USE ONLY)

State of Florida summary checklist for initial Title V permit applications for 'existing' Title V Sources

Facility Owner/Operator Name: Gulf Power Company
Facility ID No.: 0330045 Site Name: Crist Electric Generating Plant
County: Escambia
application receipt date 6/14/96

I. Preliminary scanning of application submitted.

a. Was application submitted to correct permitting authority? Y ✓ N____
b. Was an application filed? Y* ✓ N____
c. Was the application filed timely? Y* ✓ N____

d. Application format filed [check one].
Hard copy of official version of form? ✓ ELSA? 1.3(b)
A facsimile of official version of form? ____ Some combination? ____

e. 4 copies (paper/electronic) submitted? Y ✓ N____

f. Electronic diskettes protected/virus scanned/marked? Y ✓ N____ N/A____
by YKZ date 6/14/96

g. Entire hard copy of Section I. provided (Pages 1-8 of form)? Y ✓ N____
Facility identified (Page 1)? [if not complete a Page 1] Y* ✓ [Attached____]
R.O. certification signed and dated (Page 2)? Y* ✓ N____
P.E. certification signed and dated (Page 7)? Y* ✓ N____

h. Any confidential information submitted? Y____ N ✓
If yes, R.O. provided hard copy to us and EPA? Y*____ N____
If yes, hard copy locked up and note filed with application? Y*____ N____

i. Type of application filed.
TV application for 'existing' Title V Source only? Y ✓ N____
Any units subject to acid rain? Y ✓ N____

Note(s): [*] = mandatory.

Comment(s): Use hard copy as the original submittal due to ELSA problems.

Reviewer's initials RAL date 6/17/96 Concurrence initials _____ date ___/___/___

II. Application logging.

ARMS Permit Number assigned 0330045-001-AV
logged into ARMS by initials JH date 7/25/96

III. Initial distribution of application.

a. Disposition of 4 paper/electronic copies submitted:
- 1- Clean originals to file? Y____ N____
- 1- ____ District Y____ N____
- 1- _____ County [affected local program]? Y____ N____
- 1- Permit engineer(s) _____, _____

b. Disposition of electronic files submitted:
copy placed onto PC? Y____ N____

c. Disposition of ELSA submitted:
version used [circle]: 1.0 1.1 1.2.1 1.3 1.3a (1.3b)
Uploaded to EARS? Y ✓ N____
by JH. date 8/27/96

d. Electronic information submitted previewed? Y____ N____ N/A____

Comment(s):_____

{this checklist was developed from Rule 62-213.420(1)(b)2., F.A.C. and DARM policy}

6/11/96
:\t5opgen\0_check\iapcheck.doc

s to implement the intent of these
ents.

3.7 ZERO AND DRIFT

lans shall require owners or opera-
ll continuous monitoring systems
in accordance with the require-
this appendix to record the zero and
t in accordance with the method
d by the manufacturer of such in-
s; to subject the instruments to the
urer's recommended zero and span
least once daily unless the manu-
has recommended adjustments at
ntervals, in which case such rec-
tions shall be followed; to adjust
nd span whenever the 24-hour zero
-hour calibration drift limits of the
performance specifications in ap-
of part 60 are exceeded; and to ad-
tinuous monitoring systems ref-
by paragraph 3.2 of this appendix
the 24-hour zero drift or 24-hour
n drift exceed 10 percent of the
standard.

3.8 SPAN

ent span should be approximately
nt of the expected instrument data
utput corresponding to the emission
for the source.

ALTERNATIVE PROCEDURES AND REQUIREMENTS

s where States wish to utilize dif-
ut equivalent, procedures and re-
ts for continuous monitoring sys-
State plan must provide a descrip-
uch alternative procedures for ap-
the Administrator. Some examples
ions that may require alternatives

lternative monitoring requirements
modate continuous monitoring sys-
require corrections for stack mois-
itions (e.g., an instrument measur-
generator SO_2 emissions on a wet
uld be used with an instrument
g oxygen concentration on a dry
acceptable methods of measuring
isture conditions are used to allow
adjustments of the measured SO_2
ation to dry basis.)
lternative locations for installing
us monitoring systems or monitor-
es when the owner or operator can
ate that installation at alternative
will enable accurate and represent-
surements.
lternative procedures for perform-
ration checks (e.g., some instru-
ay demonstrate superior drift char-
s that require checking at less fre-
orvals).
lternative monitoring requirements
effluent from one affected facility

or the combined effluent from two or more identical affected facilities is released to the atmosphere through more than one point (e.g., an extractive, gaseous monitoring system used at several points may be approved if the procedures recommended are suitable for generating accurate emission averages).

3.9.5 Alternative continuous monitoring systems that do not meet the spectral response requirements in Performance Specification 1, appendix B of part 60, but adequately demonstrate a definite and consistent relationship between their measurements and the opacity measurements of a system complying with the requirements in Performance Specification 1. The State may require that such demonstration be performed for each affected facility.

4.0 MINIMUM DATA REQUIREMENTS

The following paragraphs set forth the minimum data reporting requirements necessary to comply with §51.214(d) and (e).

4.1 The State plan shall require owners or operators of facilities required to install continuous monitoring systems to submit a written report of excess emissions for each calendar quarter and the nature and cause of the excess emissions, if known. The averaging period used for data reporting should be established by the State to correspond to the averaging period specified in the emission test method used to determine compliance with an emission standard for the pollutant/source category in question. The required report shall include, as a minimum, the data stipulated in this appendix.

4.2 For opacity measurements, the summary shall consist of the magnitude in actual percent opacity of all one-minute (or such other time period deemed appropriate by the State) averages of opacity greater than the opacity standard in the applicable plan for each hour of operation of the facility. Average values may be obtained by integration over the averaging period or by arithmetically averaging a minimum of four equally spaced, instantaneous opacity measurements per minute. Any time period exempted shall be considered before determining the excess averages of opacity (e.g., whenever a regulation allows two minutes of opacity measurements in excess of the standard, the State shall require the source to report all opacity averages, in any one hour, in excess of the standard, minus the two-minute exemption). If more than one opacity standard applies, excess emissions data must be submitted in relation to all such standards.

4.3 For gaseous measurements the summary shall consist of emission averages, in the units of the applicable standard, for each averaging period during which the applicable standard was exceeded.

4.4 The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks, and the nature of system repairs or adjustments shall be reported. The State may require proof of continuous monitoring system performance whenever system repairs or adjustments have been made.

4.5 When no excess emissions have occurred and the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be included in the report.

4.6 The State plan shall require owners or operators of affected facilities to maintain a file of all information reported in the quarterly summaries, and all other data collected either by the continuous monitoring system or as necessary to convert monitoring data to the units of the applicable standard for a minimum of two years from the date of collection of such data or submission of such summaries.

5.0 DATA REDUCTION

The State plan shall require owners or operators of affected facilities to use the following procedures for converting monitoring data to units of the standard where necessary.

5.1 For fossil fuel-fired steam generators the following procedures shall be used to convert gaseous emission monitoring data in parts per million to g/million cal (lb/million BTU) where necessary:

5.1.1 When the owner or operator of a fossil fuel-fired steam generator elects under paragraph 2.1.4 of this appendix to measure oxygen in the flue gases, the measurements of the pollutant concentration and oxygen concentration shall each be on a dry basis and the following conversion procedure used:

$$E=CF\ [20.9/20.9—\%O_2]$$

5.1.2 When the owner or operator elects under paragraph 2.1.4 of this appendix to measure carbon dioxide in the flue gases, the measurement of the pollutant concentration and the carbon dioxide concentration shall each be on a consistent basis (wet or dry) and the following conversion procedure used:

$$E=CF_c\ (100/\%\ CO_2)$$

5.1.3 The values used in the equations under paragraph 5.1 are derived as follows:

E=pollutant emission, g/million cal (lb/million BTU),

C=pollutant concentration, g/dscm (lb/dscf), determined by multiplying the average concentration (ppm) for each hourly period by 4.16×10^{-5} M g/dscm per ppm (2.64×10^{-9} M lb/dscf per ppm) where M = pollutant molecular weight, g/g-mole (lb/lb-mole). M = 64 for sulfur dioxide and 46 for oxides of nitrogen.

Part 51, App. P

utilized by source operators to maintain emission levels at or below emission standards. Such data may be used directly or indirectly for compliance determination or any other purpose deemed appropriate by the State. Though the monitoring requirements are specified in detail, States are given some flexibility to resolve difficulties that may arise during the implementation of these regulations.

1.1 Applicability

The State plan shall require the owner or operator of an emission source in a category listed in this appendix to: (1) Install, calibrate, operate, and maintain all monitoring equipment necessary for continuously monitoring the pollutants specified in this appendix for the applicable source category; and (2) complete the installation and performance tests of such equipment and begin monitoring and recording within 18 months of plan approval or promulgation. The source categories and the respective monitoring requirements are listed below.

1.1.1 Fossil fuel-fired steam generators, as specified in paragraph 2.1 of this appendix, shall be monitored for opacity, nitrogen oxides emissions, sulfur dioxide emissions, and oxygen or carbon dioxide.

1.1.2 Fluid bed catalytic cracking unit catalyst regenerators, as specified in paragraph 2.4 of this appendix, shall be monitored for opacity.

1.1.3 Sulfuric acid plants, as specified in paragraph 2.3 of this appendix, shall be monitored for sulfur dioxide emissions.

1.1.4 Nitric acid plants, as specified in paragraph 2.2 of this appendix, shall be monitored for nitrogen oxides emissions.

1.2 Exemptions

The States may include provisions within their regulations to grant exemptions from the monitoring requirements of paragraph 1.1 of this appendix for any source which is:

1.2.1 Subject to a new source performance standard promulgated in 40 CFR part 60 pursuant to section 111 of the Clean Air Act; or

1.2.2 not subject to an applicable emission standard of an approved plan; or

1.2.3 scheduled for retirement within 5 years after inclusion of monitoring requirements for the source in appendix P, provided that adequate evidence and guarantees are provided that clearly show that the source will cease operations prior to such date.

1.3 Extensions

States may allow reasonable extensions of the time provided for installation of monitors for facilities unable to meet the prescribed timeframe (i.e., 18 months from plan approval or promulgation) provided the owner or operator of such facility demonstrates that good faith efforts have been made to obtain and install such devices within such prescribed timeframe.

1.4 Monitoring System Malfunction

The State plan may provide a temporary exemption from the monitoring and reporting requirements of this appendix during any period of monitoring system malfunction, provided that the source owner or operator shows, to the satisfaction of the State, that the malfunction was unavoidable and is being repaired as expeditiously as practicable.

2.0 Minimum Monitoring Requirement

States must, as a minimum, require the sources listed in paragraph 1.1 of this appendix to meet the following basic requirements.

2.1 Fossil fuel-fired steam generators

Each fossil fuel-fired steam generator, except as provided in the following subparagraphs, with an annual average capacity factor of greater than 30 percent, as reported to the Federal Power Commission for calendar year 1974, or as otherwise demonstrated to the State by the owner or operator, shall conform with the following monitoring requirements when such facility is subject to an emission standard of an applicable plan for the pollutant in question.

2.1.1 A continuous monitoring system for the measurement of opacity which meets the performance specifications of paragraph 3.1.1 of this appendix shall be installed, calibrated, maintained, and operated in accordance with the procedures of this appendix by the owner or operator of any such steam generator of greater than 250 million BTU per hour heat input except where:

2.1.1.1 gaseous fuel is the only fuel burned, or

2.1.1.2 oil or a mixture of gas and oil are the only fuels burned and the source is able to comply with the applicable particulate matter and opacity regulations without utilization of particulate matter collection equipment, and where the source has never been found, through any administrative or judicial proceedings, to be in violation of any visible emission standard of the applicable plan.

2.1.2 A continuous monitoring system for the measurement of sulfur dioxide which meets the performance specifications of paragraph 3.1.3 of this appendix shall be installed, calibrated, maintained, and operated on any fossil fuel-fired steam generator of greater than 250 million BTU per hour heat input which has installed sulfur dioxide pollutant control equipment.

2.1.3 A continuous monitoring system for the measurement of nitrogen oxides which meets the performance specification of paragraph 3.1.2 of this appendix shall be installed, calibrated, maintained, and operated on fossil fuel-fired steam generators of greater than 1000 million BTU per hour heat input when such facility is located in an Air Quality Control Region where the Administrator has specifically determined that a control strategy for nitrogen dioxide is necessary to attain the national standards, unless the source owner or operator demonstrates during source compliance tests as required by the State that such a source emits nitrogen oxides at levels 30 percent or more below the emission standard within the applicable plan.

2.1.4 A continuous monitoring system for the measurement of the percent oxygen or carbon dioxide which meets the performance specifications of paragraphs 3.1.4 or 3.1.5 of this appendix shall be installed, calibrated, operated, and maintained on fossil fuel-fired steam generators where measurements of oxygen or carbon dioxide in the flue gas are required to convert either sulfur dioxide or nitrogen oxides continuous emission monitoring data, or both, to units of the emission standard within the applicable plan.

2.2 Nitric acid plants

Each nitric acid plant of greater than 300 tons per day production capacity, the production capacity being expressed as 100 percent acid, located in an Air Quality Control Region where the Administrator has specifically determined that a control strategy for nitrogen dioxide is necessary to attain the national standard shall install, calibrate, maintain, and operate a continuous monitoring system for the measurement of nitrogen oxides which meets the performance specifications of paragraph 3.1.2 for each nitric acid producing facility within such plant.

2.3 Sulfuric acid plants

Each Sulfuric acid plant of greater than 300 tons per day production capacity, the production being expressed as 100 percent acid, shall install, calibrate, maintain and operate a continuous monitoring system for the measurement of sulfur dioxide which meets the performance specifications of paragraph 3.1.3 for each sulfuric acid producing facility within such plant.

2.4 Fluid bed catalytic cracking unit catalyst regenerators at petroleum refineries

Each catalyst regenerator for fluid bed catalytic cracking units of greater than 20,000 barrels per day fresh feed capacity shall install, calibrate, maintain, and operate a continuous monitoring system for the measurement of opacity which meets the performance specifications of paragraph 3.1.1.

3.0 Minimum Specifications

All State plans shall require owners or operators of monitoring equipment installed to comply with this appendix, except as provided in paragraph 3.2, to demonstrate compliance with the following performance specifications.

3.1 Performance specifications

The performance specifications set forth in appendix B of part 60 are incorporated herein by reference, and shall be used by States to determine acceptability of monitoring equipment installed pursuant to this appendix except that (1) where reference is made to the "Administrator" in appendix B, part 60, the term *State* should be inserted for the purpose of this appendix (e.g., in Performance Specification 1, 1.2, " * * * monitoring systems subject to approval by the *Administrator*," should be interpreted as, "* * * monitoring systems subject to approval by the *State*"), and (2) where reference is made to the "Reference Method" in appendix B, part 60, the State may allow the use of either the State approved reference method or the Federally approved reference method as published in part 60 of this chapter. The Performance Specifications to be used with each type of monitoring system are listed below.

3.1.1 Continuous monitoring systems for measuring opacity shall comply with Performance Specification 1.

3.1.2 Continuous monitoring systems for measuring nitrogen oxides shall comply with Performance Specification 2.

3.1.3 Continuous monitoring systems for measuring sulfur dioxide shall comply with Performance Specification 2.

3.1.4 Continuous monitoring systems for measuring oxygen shall comply with Performance Specification 3.

3.1.5 Continuous monitoring systems for measuring carbon dioxide shall comply with Performance Specification 3.

3.2 Exemptions

Any source which has purchased an emission monitoring system(s) prior to September 11, 1974, may be exempt from meeting such test procedures prescribed in appendix B of part 60 for a period not to exceed five years from plan approval or promulgation.

3.3 Calibration Gases

For nitrogen oxides monitoring systems installed on fossil fuel-fired steam generators the pollutant gas used to prepare calibration gas mixtures (Section 2.1, Performance Specification 2, appendix B, part 60) shall be nitric oxide (NO). For nitrogen oxides monitoring systems, installed on nitric acid plants the pollutant gas used to prepare calibration gas mixtures (Section 2.1, Performance Specification 2, appendix B, part 60 of this chapter) shall be nitrogen dioxide