

Mitchell, Bruce

From: Waters, Glenn D. [GDWATERS@southernco.com]
Sent: Friday, April 20, 2001 11:42 AM
To: Mitchell, Bruce
Cc: Allen, Andy; Salmon, Carolyn
Subject: Crist CAM Project

The Crist CAM test project was placed on hold this week due to a problem with plant operations resulting from the fuel pulverizers and the ESP. A steady load was not available for testing. The test contractor (SRI), Southern R&D folks and the consultant (Richard McRanie) are not available next week and we are currently trying to get everyone together again for a new test schedule. It now looks like June or July. Bruce, our construction permit limited our test window to May 4. Would you have to issue a new construction permit if we re-scheduled for June or July? Let me know your thoughts. Thanks, Dwain

G. Dwain Waters, QEP
Air Quality Programs Supervisor
Gulf Power
Phone: (850) 444-6527
Fax: (850) 444-6217
Pager: (850) 469-4076
gdwaters@southernco.com

Mitchell, Bruce

From: Waters, Glenn D. [GDWATERS@southernco.com]
Sent: Thursday, April 12, 2001 3:45 PM
To: Mitchell, Bruce
Cc: Allen, Andy; Salmon, Carolyn; Kriegel, Robert; Veazey, Sandra
Subject: Crist 7 CAM Construction Permit

Thanks, I received the signed fax version just in time before my presentation at the plant as part of our internal pre-test meeting today. All the conditions look good. I believe we are ok on the 15 day notice issue because we included the CAM testing in our original letter to the District in January or February (according to my RATA technician). Thanks for your work to make this happen and keeping us on schedule. Carolyn, let me know if you think we have a problem with the 15 day notice, otherwise we plan on setting up next week and starting some tests. This should not take more than a week or so. I will keep you informed of any problems and as with normal compliance tests, we will call the District when we start and finish.

Thanks again, Dwain
G. Dwain Waters, QEP
Air Quality Programs Supervisor
Gulf Power
Phone: (850) 444-6527
Fax: (850) 444-6217
Pager: (850) 469-4076
gdwaters@southernco.com

Mitchell, Bruce

From: Waters, Glenn D. [GDWATERS@southernco.com]
Sent: Friday, April 06, 2001 2:47 PM
To: Mitchell, Bruce
Subject: Crist CAM Status

I just wanted to check with you regarding whether FDEP received any responses on the Crist 7 CAM public notice dated March 19. If possible I would like to report on the construction permit status and any new requirements in a pre-test meeting scheduled at the plant on April 12. Are we still on schedule to receive a final permit by April 19? Do you see any delays, problems, etc.
Dwain

G. Dwain Waters, QEP
Air Quality Programs Supervisor
Gulf Power
Phone: (850) 444-6527
Fax: (850) 444-6217
Pager: (850) 469-4076
gdwaters@southernco.com



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

April 10, 2001

CERTIFIED MAIL – Return Receipt Requested

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

*Treat as a
final permit*

Dear Mr. Moore:

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

The Department has reviewed the request that you provided on March 8, 2001. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Crist Electrical Generating Plant's Unit #7's ESP (electrostatic precipitator) located in Pensacola, Escambia County. The purpose is to help the company address Compliance Assurance Monitoring (CAM), which will have to be addressed regarding the ESP upon renewal of their Title V Operation Permit. Paragraph 403.061(16), Florida Statutes (F.S.), authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide reasonable and practical regulatory controls consistent with public interest.

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

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

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

1. Unless waived, the permittee shall notify the Department's Northwest District office and the Bureau of Air Regulation at least 15 days prior to commencement of the performance tests and parameter measurements or monitoring. A written report shall be submitted to these offices within 45 days upon completion of the last test run and parameter measurements and monitoring.
2. The authorized testing and measurement and monitoring schedule is from April 14 to May 4, 2001. If additional time is needed, the permittee shall provide the Department with documentation of the progress accomplished to date and shall identify what is left to be done to complete the testing and measurements or monitoring.
3. The parameters to be measured or monitored are sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), carbon dioxide (CEM), particulate size distribution, ash content of the fuel, ultimate fuel analyses, load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model.
4. Emissions testing shall be conducted for the following pollutants and using the following test methods:
 - a. Particulate matter EPA Test Method 17 (including EPA Test Methods 1 thru 4)
 - b. Visible emissions EPA Test Method 9
5. The release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C., is not authorized for this activity.
6. Performance testing shall immediately cease upon the occurrence of a valid environmental complaint by a citizen or other party, or a nuisance or danger to the public health or welfare. Performance testing shall not resume until appropriate measures to correct the problem have been implemented.
7. The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida.
8. This Department action is just to authorize the performance testing and parameter measurements and monitoring for the Crist Unit #7's ESP for the purpose of developing a CAM protocol.
9. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
10. The Department shall be notified in writing on the date of the last test run and parameter measurement and monitoring completion. If after work hours, notification shall occur on the next work day.

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

11. Attachment Section.

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

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

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources Management

HLR/rbm

Enclosures

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

FINAL DETERMINATION

Gulf Power Company

Project No.: 0330045-002-AC

I. Public Notice and Comments.

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

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

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

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

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

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

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

II. Conclusion.

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

Florida Department of
Environmental Protection

Memorandum

Bruce

TO: Howard Rhodes *[Signature]*
THRU: Clair Fancy *[Signature]*
FROM: Bruce Mitchell *[Signature]*
DATE: April 10, 2001

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

The proposed project was Public Noticed in the Pensacola News Journal on March 20, 2001. No comments were received during the commenting period (14-days), which ended April 2, 2001.

It is recommended that the letter be signed.

HLR/rbm

Attachment

Fax #: 850/464-6317



Florida Department of Environmental Protection

Jeb Bush Governor

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

David Struhs Secretary

FAX TRANSMITTAL SHEET

DATE: 4-12-2001

TO: G. D wain Waters

PHONE: 850/444-6527

FAX: 850/444-6217

FROM: Bruce Mitchell

PHONE: 850/921-9506

Division of Air Resources Management

FAX: 850.922.6979

RE: CAM Protocol; Plant Crist

CC:

Total number of pages including cover sheet: 5

Message

Hard copy to follow. Please give me a call if there is any problems in transmitting /readability.

JLmba,

Bruce Mitchell

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

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Florida Department of Environmental Protection

Jeb Bush Governor

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

David Struhs Secretary

FAX TRANSMITTAL SHEET

DATE: 4-12-2001

TO: Ms. Sandra Veazey

36/695-8096

PHONE: SC/695-8364

FAX: SC/695-8417

FROM: Bruce Mitchell

PHONE: SC/291-9506

Division of Air Resources Management

FAX: 850.922.6979

RE: Gulf Power Crist Plant: CAM testing

CC:

4-12-01 down 11:45

Total number of pages including cover sheet: 5

Message

Please advise is unreadable.

[Handwritten signature]

[Handwritten signature]

4-12-01 @ 12:30 pkg did not go through. Mary Beth Curke e-mailed the pkg + sent signature page by fax

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

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Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees \$		
Name (Please Print Clearly) (to be completed by mailer) Robert G. Moore, V.P. of Power Generation/Transmission Street, Apt. No., or PO Box No. Gulf Power Corp. - One Energy Place City, State, ZIP+4 Pensacola Fla 32520-0328		
PS Form 3800, July 1999		See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY								
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<table border="1"> <tr> <td>A. Received by (Please Print Clearly) <i>RG Moore</i></td> <td>B. Date of Delivery <i>4/16/0</i></td> </tr> <tr> <td>C. Signature <i>X RG Moore</i></td> <td> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee </td> </tr> <tr> <td colspan="2">D. Is delivery address different from item 1? If YES, enter delivery address below:</td> </tr> <tr> <td colspan="2"> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </td> </tr> </table>	A. Received by (Please Print Clearly) <i>RG Moore</i>	B. Date of Delivery <i>4/16/0</i>	C. Signature <i>X RG Moore</i>	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee	D. Is delivery address different from item 1? If YES, enter delivery address below:		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
A. Received by (Please Print Clearly) <i>RG Moore</i>	B. Date of Delivery <i>4/16/0</i>								
C. Signature <i>X RG Moore</i>	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee								
D. Is delivery address different from item 1? If YES, enter delivery address below:									
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No									
1. Article Addressed to: <i>Mr. Robert G. Moore</i> <i>V.P. of Power Generation/Transmission</i> <i>Gulf Power Company</i> <i>One Energy Place</i> <i>Pensacola, Florida 32520-0328</i>	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.								
2. Article Number (Copy from service label)	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes								

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

Certified Mail



March 26, 2001

Scott M. Sheplak
Title V Section – Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

RECEIVED

MAR 27 2001

BUREAU OF AIR REGULATION

Dear Mr. Sheplak:

RE: CRIST ELECTRIC GENERATING PLANT
PUBLIC NOTICE AFFIDAVIT – CAM TESTING
PERMIT No: 0330045-001-AV

Attached, please find proof of publication, i.e. newspaper affidavit of “Public Notice Of Intent To Issue An Air Construction Permit” for the Crist Electric Generating Plant – Authorization to conduct CAM protocol testing per your instructions dated March 19, 2001.

Gulf Power would like to thank you and your staff for meeting with me in January and for working with us to meet our goal to develop a Compliance Assurance Monitoring (CAM) protocol for Plant Crist.

If you have any questions regarding CAM or the protocol development for Crist Unit 7, please call me at (850) 444.6527.

Sincerely,

A handwritten signature in black ink that reads "G. Dwain Waters Q.E.P.".

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

cc: w/att: Jim. Vick, Gulf Power Company
John Dominey, Gulf Power Company
Terry Wright, Gulf Power Company
Kevin Beaty, Gulf Power Company
Greg Terry, Gulf Power Company
Mark Berry, Southern Company Services

Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida

Published Daily • Pensacola, Escambia County, FL

RECEIVED

MAR 27 2001

BUREAU OF AIR REGULATION

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 Public Notice of Intent in the matter of in the Court, was published in said newspaper in the issues of March 20, 2001

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 23rd day of MAR A.D., 20 01

Bereth Ferguson

Notary Public

BERETH FERGUSON Notary Public-State of FL My comm. expires: Oct. 10, 2001 Comm. No. CC667980

BERETH FERGUSON Notary Public-State of FL My comm. expires: Oct. 10, 2001 Comm. No. CC667980

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL Draft Air Construction Permit No.: 033 Gulf Power Company Crist Electrical Generating Plant Escambia County

The Department of Environmental Protection (permitting authority) is issuing an Air Construction Permit to Gulf Power Company for its Crist Electrical Generating Plant located in Escambia County. The applicant's name and address are: Gulf Power Company, 32520-0328, Florida 32520-0328.

The permittee, Gulf Power Company, applied on March 8, 2001, for testing and parameter measurements for the development of a CAI Unit #7's ESP (electrostatic precipitator), which is located in Pensacola, Escambia County. The evaluation will require Gulf Power Company to establish a performance curve between opacity, particulate emissions, and other unit specific parameters that are needed for creating an operational condition near or in excess of the Florida part 61. The performance of the Crist Unit #7's ESP. The pollutants and or parameters include sulfur dioxide, nitrogen oxides, particulate matter, visible emission, ultimate fuel analyses, unit operational parameters including temperature, and other unit specific parameters that are needed for testing is scheduled to run from April 14 to May 4, 2001.

The permitting authority will issue the Air Construction Permit in accordance with the conditions of the Draft Air Construction Permit. The following procedures result in a different set of conditions.

The permitting authority will accept written comments concerning permit issuance action for a period of 14 (fourteen) days from the date comments should be provided to the Department's Bureau of Air Regulation, Tallahassee, Florida 32399-2400. Any written comments received result in a significant change in the permit. If written comments received result in a significant change in the permit, the permitting authority shall issue a Revised Draft Air Construction Permit.

A person whose substantial interests are affected by the proposed administrative hearing in accordance with Sections 120.569 and 120.570 must contain the information set forth below and must be filed with the Department of Environmental Protection, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Those entitled to written notice under Section 120.60(3), F.S., must be given notice of the public notice or within fourteen days of receipt of the notice. However, any person who asked the permitting authority to file a petition within fourteen days of receipt of that notice, regardless of whether a copy of the petition to the applicant at the address indicated on any person to file a petition within the applicable time period shall request an administrative determination (hearing) under Sections 120.570 and 120.571 and participate as a party to it. Any subsequent intervention shall be filed with the presiding officer upon the filing of a motion in compliance with Rule 17.02, F.A.C.

A petition that disputes the material facts upon which the permitting authority is basing its decision shall contain the following information:

- (a) The name and address of each agency affected and each agency's representative;
(b) The name, address and telephone number of the petitioner, name of petitioner's representative, if any, which shall be the address for service of process; and an explanation of how petitioner's substantial rights will be affected;
(c) A statement of how and when the petitioner received notice of this proceeding;
(d) A statement of all disputed issues of material fact. If there are no disputed issues of material fact, the petitioner shall so state;
(e) A concise statement of the ultimate facts alleged, as well as the relief requested; and
(f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority is basing its decision shall contain the same information as required by Rule 17.02, F.A.C.

Because the administrative hearing process is designed to formulate a final decision, the permitting authority's final action may be different from the applicant's intent. Persons whose substantial interests will be affected by any such final action on the application have the right to petition to become a party to the proceeding and to be heard on the application.

Mediation is not available for this proceeding.

A complete project file is available for public inspection during normal business hours, 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: 850/488-1344, Fax: 850/922-6979. Affected District Authority: Department of Environmental Protection, Northwest District Office, Air Resources, 160 Governmental Place, Pensacola, Florida 32520, Telephone: 850/595-8300, Fax: 850/595-4417.

The complete project file includes the Draft Air Construction Permit, the information submitted by the responsible official, exclusive of confidential information. Interested persons may contact Scott M. Sheplak, P.E., at the above address for more information.

Legal No. 61340

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Draft Air Construction Permit No.: 0330045-002-AC
Gulf Power Company
Crist Electrical Generating Plant
Escambia County

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

The permittee, Gulf Power Company, applied on March 8, 2001, for authorization to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Unit #7's ESP (electrostatic precipitator), which is located at the Crist Electric Generating Plant in Pensacola, Escambia County. The evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions standard. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit #7's ESP. The pollutants and/or parameters to be measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, visible emissions, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air and flue gas temperature, and other unit specific parameters that are needed for the computer model. The development testing is scheduled to run from April 14 to May 4, 2001.

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

The permitting authority will accept written comments concerning the proposed Draft Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air 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 result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any person other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file(s) or identification number(s), if known;
- (b) The name, address and telephone number of the petitioner, name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination;
- (c) A statement of how and when the petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so state;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; and
- (f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation is not available for this proceeding.

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

Permitting Authority:	Affected District Authority:
Department of Environmental Protection	Department of Environmental Protection
Bureau of Air Regulation	Northwest District Office
111 South Magnolia Drive, Suite 4	Air Resources
Tallahassee, Florida 32301	160 Governmental Place
Telephone: 850/488-1344	Pensacola, Florida 32520-0328
Fax: 850/922-6979	Telephone: 850/595-8300
	Fax: 850/595-4417

The complete project file includes the Draft Air Construction Permit, the application/request, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.

GULF POWER COMPANY
One Energy Place
Pensacola, FL 32520-0328

Fax Phone: 850.444.6217 -
Environmental Affairs

Fax

To:	Bruce Mitchell FDEP-Tallahassee	From:	Dwain Waters Gulf Power Co. / Environmental Affairs
Fax:	(850) 922-6979	Pages:	3
Phone:	850 921-9505	Date:	03/24/01
Re:			

Urgent For Your Review Comment by _____

Please Reply Please Recycle

● **Comments:**

Copy of Crist 7 CAM Public Notice.

I will mail a copy tomorrow to you.

Please call on any questions. Thanks again for your quick response regarding this issue.

DW

Best Available Copy



Published Daily • Pensacola, Escambia County, FL

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... in the matter of Public Notice of Intent in the Court, was published in said newspaper in the issues of March 20, 2001

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 23rd day of MAR A.D., 20 01

Bereth Ferguson Notary Public

BERETH FERGUSON Notary Public-State of FL My comm. expires: Oct. 10, 2001 Comm. No. CC867980

BERETH FERGUSON Notary Public-State of FL My comm. expires: Oct. 10, 2001 Comm. No. CC867980

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL Draft Air Construction Permit No.: 033 Gulf Power Company Critic Electrical Generating Pl Escambia County

The Department of Environmental Protection (permitting authority) construction permit to Gulf Power Company for its Critic Electr Escambia County. The applicant's name and address are: Gulf Pow Florida 32510-0328.

The permittee, Gulf Power Company, applied on March 8, 2001 testing and parameter measurements for the development of a CAJ Critic Unit #7's ESP (electrostatic precipitator), which is located Pensacola, Escambia County. The evaluation will require Gulf Power of the ESP to establish a performance curve between opacity, particulate emissions in operational condition near or in excess of the Florida part gathered will allow the calibration of an RPN (Electrical Power Rese the performance of the Critic Unit #7's ESP. The pollutants and or pa include sulfur dioxide, nitrogen oxides, particulate matter, visible em fuel, ultimate fuel analysis, unit operational parameters including temperature, and other unit specific parameters that are needed for testing is scheduled to run from April 14 to May 4, 2001.

The permitting authority will issue the Air Construction Permit in accordance with the conditions of the Draft Air Construc accordance with the following procedures results in a different de conditions.

The permitting authority will accept written comments concern Permit issuance action for a period of 14 (fourteen) days from the di comments should be provided to the Department's Bureau of Air F Station #5505, Tallahassee, Florida 32399-2400. Any written commo Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938 those entitled to written notice under Section 120.60(9), F.S., must b of the public notice or within fourteen days of receipt of the notice Section 120.60(3), F.S., however, any person who filed the permitting file a petition within fourteen days of receipt of that notice, regardless shall mail a copy of the petition to the applicant at the address indicat of any person to file a petition within the applicable time-period shall request an administrative determination (hearing) under Sections 120 this proceeding and participate as a party to it. Any subsequent inter presiding officer upon the filing of a motion in compliance with Rule (F.A.C.)

A person whose substantial interests are affected by the propose administrative hearing in accordance with Sections 120.569 and 12 petition must contain the information set forth below and must be fil of the Department of Environmental Protection, 3900 Commonwealth Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938 those entitled to written notice under Section 120.60(9), F.S., must b of the public notice or within fourteen days of receipt of the notice Section 120.60(3), F.S., however, any person who filed the permitting file a petition within fourteen days of receipt of that notice, regardless shall mail a copy of the petition to the applicant at the address indicat of any person to file a petition within the applicable time-period shall request an administrative determination (hearing) under Sections 120 this proceeding and participate as a party to it. Any subsequent inter presiding officer upon the filing of a motion in compliance with Rule (F.A.C.)

A petition that disputes the material facts on which the permitting a following information:

- (a) The name and address of each agency affected and each agency's known;
(b) The name, address and telephone number of the petitioner, naty petitioner's representative, if any, which shall be the address for servi proceeding; and an explanation of how petitioner's substantial rights wil
(c) A statement of how and when the petitioner received notice of th
(d) A statement of all disputed issues of material fact. If there are no
(e) A concise statement of the ultimate facts alleged, as well as the ru relief; and
(f) A demand for relief.

A petition that does not dispute the material facts upon which the pe state that no such facts are in dispute and otherwise shall contain the sar required by Rule 28-106.201, F.A.C.

Because the administrative hearing process is designed to formulate f means that the permitting authority's final action may be different from intent. Persons whose substantial interests will be affected by any such fi on the application have the right to petition to become a party to the pr requirements set forth above.

Mediation is not available for this proceeding.

A complete project file is available for public inspection during norm p.m., Monday through Friday, except legal holidays. or

Permitting Authority: Department of Environmental Protection Bureau of Air Regulation 111 South Magnolia Drive, Suite 4 Tallahassee, Florida 32301 Telephone: 850/488-1344 Fax: 850/922-9979
Affected Districts Authority: Department of Environmen Northwest District Office Air Resources 160 Governmental Plaza Pensacola, Florida 32520 Telephone: 850/595-8300 Fax: 850/594-4417

The complete project file includes the Draft Air Construction Permit, information submitted by the responsible official, exclusive of confidential interested persons may contact Scott M. Sheplak, RE, at the above addn information.

Legal No. 61940

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Draft Air Construction Permit No. 0330043-002-AC
Gulf Power Company
Crist Electric Generating Plant
Escambia County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit to Gulf Power Company for its Crist Electric Generating Plant located in Pensacola, Escambia County. The applicant's name and address are: Gulf Power Company, One Energy Place, Pensacola, Florida 32510-0328.

The permittee, Gulf Power Company, applied on March 6, 2001, for authorization to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Unit #7's ESP (electrostatic precipitator), which is located at the Crist Electric Generating Plant in Pensacola, Escambia County. The evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions standard. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit #7's ESP. The pollutants and/or parameters to be measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, visible emissions, carbon dioxide, ash content of the fuel, ultimate fuel analysis, unit operational parameters including load, fuel flow, excess air and flue gas temperature, and other unit specific parameters that are needed for the computer model. The development testing is scheduled to run from April 14 to May 4, 2001.

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

The permitting authority will accept written comments concerning the proposed Draft Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air 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 result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any person other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file(s) or identification number(s), if known;
- (b) The name, address and telephone number of the petitioner, name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination;
- (c) A statement of how and when the petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so state;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; and
- (f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation is not available for this proceeding.

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

Permitting Authority: Department of Environmental Protection Bureau of Air Regulation 111 South Magnolia Drive, Suite 4 Tallahassee, Florida 32301 Telephone: 850/488-1344 Fax: 850/922-6979	Affected District Authority: Department of Environmental Protection Northwest District Office Air Resources 160 Governmental Place Pensacola, Florida 32510-0328 Telephone: 850/595-8300 Fax: 850/595-4417
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The complete project file includes the Draft Air Construction Permit, the application/request, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheple, P.E., at the above address, or call 850/921-9592, for additional information.

Legal No. G1340

17 March 20, 2001

er Co. / Environmental Affairs

Comment by _____

Mitchell, Bruce

From: Waters, Glenn D. [GDWATERS@southernco.com]
Sent: Friday, March 16, 2001 5:01 PM
To: Mitchell, Bruce
Subject: RE: Intent package for the Crist Unit #7: CAM protocol determination on the ESP.

I got it. Thanks Bruce for the quick review. I will try to get it published this weekend or Monday. Thanks again.

G. Dwain Waters, QEP
Air Quality Programs Supervisor
Gulf Power
Phone: (850) 444-6527
Fax: (850) 444-6217
Pager: (850) 469-4076
gdwaters@southernco.com

> -----Original Message-----

> From: Mitchell, Bruce [SMTP:Bruce.Mitchell@dep.state.fl.us]

> Sent: Friday, March 16, 2001 3:41 PM

> To: gdwaters@southernco.com

> Cc: Fancy, Clair; Sheplak, Scott; Veazey, Sandra; Allen, Andy; Kahn,

> Joseph

> Subject: Intent package for the Crist Unit #7: CAM protocol

> determination on the ESP.

>

> 3/16/2001

>

> Dear Dwayne,

>

> Here's the package that we spoke about earlier. Please get the paper to

> provide the Public Notice and affidavit as soon as possible so I can get

> the

> final authorization signed as soon as the Notice period is completed

> (assuming no challenge to the proposal). Many t

> <<0330045.002.draft.auth.letter.doc>> <<0330045i.002.doc>> hanks.

>

> Bruce Mitchell

> 850/921-9506 << File: 0330045.002.draft.auth.letter.doc >> << File:

> 0330045i.002.doc >>

Mitchell, Bruce

To: gdwaters@southernco.com
Cc: Fancy, Clair; Sheplak, Scott; Veazey, Sandra; Allen, Andy; Kahn, Joseph
Subject: Intent package for the Crist Unit #7: CAM protocol determination on the ESP.

3/16/2001

Dear Dwayne,

Here's the package that we spoke about earlier. Please get the paper to provide the Public Notice and affidavit as soon as possible so I can get the final authorization signed as soon as the Notice period is completed (assuming no challenge to the proposal). Many thanks.

Bruce Mitchell
850/921-9506



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

March 19, 2001

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

Re: Request for Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Crist Unit #7's Electrostatic Precipitator (ESP)

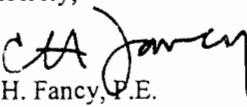
Dear Mr. Moore:

Attached is one copy of the proposed authorization, 0330045-002-AC, to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Unit #7's ESP, which is located at the Crist Electric Generating Plant in Pensacola, Escambia County. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions standard. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit #7's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, visible emissions, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air and flue gas temperature, and other unit specific parameters that are needed for the computer model. The development testing is scheduled to run from April 14 to May 4, 2001.

The permitting authority's "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" are also included. The "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" must be published as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

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 Bruce Mitchell at 850/921-9506.

Sincerely,


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

CHF/BM/m

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permit by:

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

Air Construction Permit No.: 0330045-002-AC
Crist Electric Generating Plant
Escambia County

INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an air construction permit (copy of draft permit enclosed) for the facility detailed in the application specified above, to authorize Gulf Power Company to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Unit #7's electrostatic precipitator (ESP), which is located at the Crist Electric Generating Plant in Pensacola, Escambia County.

The permittee, Gulf Power Company, applied on March 8, 2001, for authorization to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Unit #7's ESP (electrostatic precipitator), which is located at the Crist Electric Generating Plant in Pensacola, Escambia County. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions standard. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit #7's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, visible emissions, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air and flue gas temperature, and other unit specific parameters that are needed for the computer model. The development testing is scheduled to run from April 14 to May 4, 2001.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4 and 62-210, F.A.C. This source is not exempt from permitting procedures. The permitting authority has determined that an Air Construction Permit is required for the proposed activity.

The permitting authority intends to issue this Air Construction Permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road,

Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-1344; Fax: 850/922-6979), within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

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

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

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

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

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

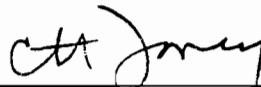
- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

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

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

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



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 AN AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE and the Draft Permit) and all copies were sent by certified mail before the close of business on 3/19/01 to the person(s) listed:

Mr. Robert G. Moore, Responsible Official and V.P. of Power Generation/Transmission, GPC

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE and the Draft Permit) were sent by U.S. mail on the same date to the person(s) listed:

Mr. G. Dwayne Waters, Air Quality Programs Supervisor, GPC
Mr. Gregory N. Terry, P.E., GPC
Ms. Sandra Veazey, DEP - NWD
Mr. Joe Kahn, DEP - DARM

Clerk Stamp

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

Barbara J. Friday 3/19/01
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Construction Permit No.: 0330045-002-AC
Gulf Power Company
Crist Electrical Generating Plant
Escambia County

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

The permittee, Gulf Power Company, applied on March 8, 2001, for authorization to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Unit #7's ESP (electrostatic precipitator), which is located at the Crist Electric Generating Plant in Pensacola, Escambia County. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions standard. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit #7's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, visible emissions, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air and flue gas temperature, and other unit specific parameters that are needed for the computer model. The development testing is scheduled to run from April 14 to May 4, 2001.

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

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

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition

to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file(s) or identification number(s), if known;
- (b) The name, address and telephone number of the petitioner; name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination;
- (c) A statement of how and when the petitioner received notice of the agency action or proposed action;
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- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; and
- (f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation is not available for this proceeding.

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

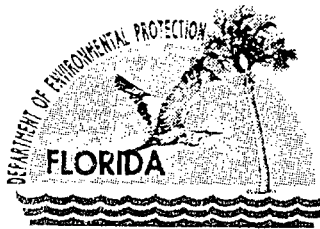
Permitting Authority:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-1344
Fax: 850/922-6979

Affected District Authority:

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

The complete project file includes the Draft Air Construction Permit, the application/request, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

April xx, 2001

CERTIFIED MAIL – Return Receipt Requested

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

Dear Mr. Moore:

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

The Department has reviewed the request that you provided on March 8, 2001. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Crist Electrical Generating Plant's Unit #7's ESP (electrostatic precipitator) located in Pensacola, Escambia County. The purpose is to help the company address Compliance Assurance Monitoring (CAM), which will have to be addressed regarding the ESP upon renewal of their Title V Operation Permit. Paragraph 403.061(16), Florida Statutes (F.S.), authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide reasonable and practical regulatory controls consistent with public interest.

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

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

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

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

1. The permittee shall notify the Department's Northwest District office and the Bureau of Air Regulation at least 15 days prior to commencement of the performance tests and parameter measurements or monitoring. A written report shall be submitted to these offices within 45 days upon completion of the last test run and parameter measurements and monitoring.
2. The authorized testing and measurement and monitoring schedule is from April 14 to May 4, 2001. If additional time is needed, the permittee shall provide the Department with documentation of the progress accomplished to date and shall identify what is left to be done to complete the testing and measurements or monitoring.
3. The parameters to be measured or monitored are sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), carbon dioxide (CEM), particulate size distribution, ash content of the fuel, ultimate fuel analyses, load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model.
4. Emissions testing shall be conducted for the following pollutants and using the following test methods:
 - a. Particulate matter EPA Test Method 17 (including EPA Test Methods 1 thru 4)
 - b. Visible emissions EPA Test Method 9
5. The release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C., is not authorized for this activity.
6. Performance testing shall immediately cease upon the occurrence of a valid environmental complaint by a citizen or other party, or a nuisance or danger to the public health or welfare. Performance testing shall not resume until appropriate measures to correct the problem have been implemented.
7. The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida.
8. This Department action is just to authorize the performance testing and parameter measurements and monitoring for the Crist Unit #7's ESP for the purpose of developing a CAM protocol.
9. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
10. The Department shall be notified in writing on the date of the last test run and parameter measurement and monitoring completion.

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

11. Attachment Section.

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

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

Sincerely,

Howard L. Rhodes, Director
Division of Air Resources Management

HLR/rbm

Enclosure

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

DRAFT

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111



Certified Mail

RECEIVED

MAR 08 2001

BUREAU OF AIR REGULATION

March 1, 2001.

R. Bruce Mitchell
Title V Section – Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

RE: CRIST ELECTRIC GENERATING PLANT
AUTHORIZATION TO CONDUCT CAM PROTOCOL TESTING
PERMIT No: 0330045-001-AV

Thanks again for meeting with me in January and sending examples of similar permitting activities to help Gulf Power properly coordinate our proposed testing of the Crist Unit 7 electrostatic precipitator (ESP) for development of a Compliance Assurance Monitoring (CAM) protocol. As you are aware, CAM is a requirement that must be addressed in the next round of Title V permit renewals for all facilities having pollution control equipment. In order to meet this goal, Gulf Power is planning a series of special particulate emission tests to calibrate a EPRI (Electric Power Research Institute) computer model to evaluate the performance of the Crist Unit 7 ESP. Simply stated, this evaluation will require Gulf Power to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate emissions standard.

Therefore, Gulf Power requests a permit amendment to allow the CAM protocol developmental testing on Crist Unit 7 from April 9 through May 4, 2001 as needed to complete all tests and measurements. Authorization of these tests is consistent with the Department's power and duty under Section 403.061(18), Florida Statutes, to "[e]ncourage and conduct studies, investigations, and research relating to pollution and its causes, effects, prevention, abatement, and control."

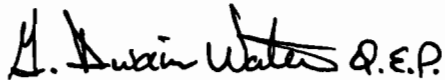
Mr. R. Bruce Mitchell
March 1, 2001
Page 2

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

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

If you have any questions or need further information regarding the test procedures or CAM protocol development for Crist Unit 7, please call me at (850) 444.6527.

Sincerely,



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

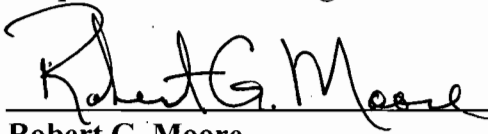
cc: w/att: Jim. Vick, Gulf Power Company
Joe Martin, Gulf Power Company
John Dominey, Gulf Power Company
Kevin Beaty, Gulf Power Company
Greg Terry, Gulf Power Company
Danny Herrin, Southern Company Services
Mark Berry, Southern Company Services
Gary Perko, HGSS

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

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

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

Responsible Official Signature:



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

3/2/01
Date:

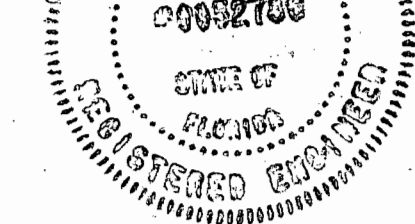
**CRIST UNIT 7 COMPLIANCE ASSURANCE MONITORING
TEST PROTOCOL AND SCHEDULE
CERTIFICATION BY PROFESSIONAL ENGINEER**

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

Professional Engineer Signature:



Gregory N. [unclear]
Registration Number: 52786



3-5-01
Date



Jeb Bush
Governor

Bruce Mitchell

Department of Environmental Protection

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

David B. Struhs
Secretary

February 14, 2001

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

Dear Mr. Waters:

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

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

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

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

Sincerely,

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

RBM/m

Enclosures

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

"More Protection, Less Process"

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

AUG 26 2005

BUREAU OF AIR REGULATION



Overnight Mail

August 22, 2005

United States Environmental Protection Agency
Clean Air Markets Division (6204J)
Attention: Designated Representative
1310 L. St. NW
Washington, DC 20005

Dear Sirs:

RE: DESIGNATED REPRESENTATIVE CHANGE
CRIST ELECTRIC GENERATING PLANT (ORIS 641)
LANSING SMITH ELECTRIC GENERATING PLANT (ORIS 642) 0050014-010-AV
SCHOLZ ELECTRIC GENERATING PLANT (ORIS 643)

Attached, please find revised designated representation forms for the Crist Electric
Generating Plant (ORIS Code 641), Scholz Electric Generating Plant (ORIS Code 643)
and Lansing Smith Electric Generating Plant (ORIS Code 642).

If you have any questions or need further information regarding this change request,
please call me at (850) 444.6527.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Dwain Waters, Q.E.P.", with a horizontal line drawn through the signature.

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

August 22, 2005
Page 2
USEPA
Designated Representative Change

cc: w/att: Jim. Vick, Gulf Power Company
Joe Martin, Gulf Power Company
Johnny Howze, Gulf Power Company
Michael Burroughs, Gulf Power Company
Marie Largilliere, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Kenny Peacock, Gulf Power Company
Brian Toth, Southern Company Services
Gary Perko, Hopping, Green & Sams

Florida Department of Environmental Protection,
Air Resources Management, Tallahassee, Florida



Certificate of Representation

For more information, see instructions and refer to 40 CFR 72.24

This submission is: New Revised (revised submissions must be complete; see instructions)

STEP 1
Identify the source by plant name, State, and ORIS code.

Plant Name Crist Electric Generating Plant	FL State	641 ORIS Code
---	----------	---------------

STEP 2
Enter requested information for the designated representative.

Name W. Paul Bowers	
Address Southern Company Generation 600 North 18th. Street - 15th Floor Birmingham, Alabama 35203	
Phone Number 205.257.5355	Fax Number 205.257.0526
E-mail address (if available) wpbowers-dr@southernco.com	

STEP 3
Enter requested information for the alternate designated representative, if applicable.

Name James O. Vick / Penny M. Manuel	
Phone Number 850.444.6311 / 850.444.6383	Fax Number 850.444.6217 / 850.444.6744
E-mail address (if available) jo Vick@southernco.com / pmmanuel@southernco.com	

STEP 4: Complete Steps 5 and 6, read the certifications, sign and date.

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' for the affected source and each affected unit at the source identified in this certificate of representation, 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:


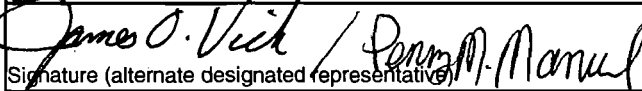
I have given a written notice of my selection as the designated representative or alternate designated representative, as applicable, and of the agreement by which I was selected to each owner and operator of the affected source and of each affected unit at the source; and

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.

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.

Crist Electric Generating Plant
Plant Name (from Step 1)

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)	11 Aug 05 Date
 Signature (alternate designated representative)	7/18/05 / 7-18-05 Date

STEP 5
 Provide the name of every owner and operator of the source and identify each affected unit they own and/or operate.

Gulf Power Company					<input checked="" type="checkbox"/> Owner <input checked="" type="checkbox"/> Operator	
Name						
ID# 1	ID# 2	ID# 3	ID# 4	ID# 5	ID# 6	ID# 7
ID#	ID#	ID#	ID#	ID#	ID#	ID#

Name					<input type="checkbox"/> Owner <input type="checkbox"/> Operator	
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#

Name					<input type="checkbox"/> Owner <input type="checkbox"/> Operator	
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#

STEP 6
 For any new affected units listed at STEP 5 that have not commenced commercial operation, enter the projected date on which the unit is expected to commence commercial operation.

ID#	Projected Commence Commercial Operation Date:
ID#	Projected Commence Commercial Operation Date:
ID#	Projected Commence Commercial Operation Date:
ID#	Projected Commence Commercial Operation Date:



Certificate of Representation

For more information, see instructions and refer to 40 CFR 72.24

This submission is: New Revised (revised submissions must be complete; see instructions)

STEP 1
Identify the source by plant name, State, and ORIS code.

Plant Name	Lansing Smith Electric Generating Plant	FL State	642 ORIS Code
------------	--	----------	-------------------------

STEP 2
Enter requested information for the designated representative.

Name	W. Paul Bowers		
Address	Southern Company Generation 600 North 18th. Street - 15th Floor Birmingham, Alabama 35203		
Phone Number	205.257.5355	Fax Number	205.257.0526
E-mail address (if available)	wpowers-dr@southernco.com		

STEP 3
Enter requested information for the alternate designated representative, if applicable.

Name	James O. Vick / Penny M. Manuel		
Phone Number	850.444.6311 / 850.444.6383	Fax Number	850.444.6217 / 850.444.6744
E-mail address (if available)	jovick@southernco.com / pmmanuel@southernco.com		

STEP 4: Complete Steps 5 and 6, read the certifications, sign and date.

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' for the affected source and each affected unit at the source identified in this certificate of representation, 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:

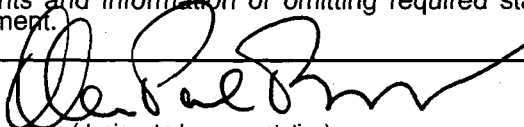
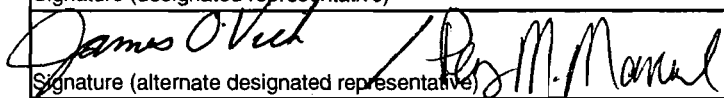
I have given a written notice of my selection as the designated representative or alternate designated representative, as applicable, and of the agreement by which I was selected to each owner and operator of the affected source and of each affected unit at the source; and

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.

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.

Lansing Smith Electric Generating Plant
Plant Name (from Step 1)

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)	11 Aug 05' Date
 Signature (alternate designated representative)	7/18/05 / 7-18-05 Date

STEP 5
Provide the name of every owner and operator of the source and identify each affected unit they own and/or operate.

Gulf Power Company					<input checked="" type="checkbox"/> Owner <input checked="" type="checkbox"/> Operator	
Name						
ID# 1	ID# 2	ID# 4	ID# 5	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#

Name					<input type="checkbox"/> Owner <input type="checkbox"/> Operator	
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#

Name					<input type="checkbox"/> Owner <input type="checkbox"/> Operator	
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#

STEP 6
For any new affected units listed at STEP 5 that have not commenced commercial operation, enter the projected date on which the unit is expected to commence commercial operation.

ID#	Projected Commence Commercial Operation Date:
ID#	Projected Commence Commercial Operation Date:
ID#	Projected Commence Commercial Operation Date:
ID#	Projected Commence Commercial Operation Date:



Certificate of Representation

For more information, see instructions and refer to 40 CFR 72.24

This submission is: New Revised (revised submissions must be complete; see instructions)

STEP 1
Identify the source by plant name, State, and ORIS code.

Plant Name Scholz Electric Generating Plant	FL State	643 ORIS Code
--	----------	----------------------

STEP 2
Enter requested information for the designated representative.

Name W. Paul Bowers	
Address Southern Company Generation 600 North 18th. Street - 15th Floor Birmingham, Alabama 35203	
Phone Number 205.257.5355	Fax Number 205.257.0526
E-mail address (if available) wpbowers-dr@southernco.com	

STEP 3
Enter requested information for the alternate designated representative, if applicable.

Name James O. Vick / Penny M. Manuel	
Phone Number 850.444.6311 / 850.444.6383	Fax Number 850.444.6217 / 850.444.6744
E-mail address (if available) joivick@southernco.com / pmmanuel@southernco.com	

STEP 4: Complete Steps 5 and 6, read the certifications, sign and date.

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' for the affected source and each affected unit at the source identified in this certificate of representation, 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.

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.

Scholz Electric Generating Plant
Plant Name (from Step 1)

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)	11 Aug 05 Date
 Signature (alternate designated representative)	7/18/05 / 7-130 Date

STEP 5
Provide the name of every owner and operator of the source and identify each affected unit they own and/or operate.

Gulf Power Company					<input checked="" type="checkbox"/> Owner	<input checked="" type="checkbox"/> Operator
Name						
ID# 1	ID# 2	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#

Name					<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#

Name					<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#

STEP 6
For any new affected units listed at STEP 5 that have not commenced commercial operation, enter the projected date on which the unit is expected to commence commercial operation.

ID#	Projected Commence Commercial Operation Date:
ID#	Projected Commence Commercial Operation Date:
ID#	Projected Commence Commercial Operation Date:
ID#	Projected Commence Commercial Operation Date:

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111



Certified Mail

March 3, 2005

Ms. Sandra Veazey
Florida Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, FL 32501-5794

Dear Ms. Veazey:

RE: LANSING SMITH ELECTRIC GENERATING PLANT
RESPONSIBLE OFFICIAL REQUEST CHANGE
PERMIT No: 0050014-010-AV

Attached, please find a revised "Responsible Official Notification Form" for Gulf Power's Lansing Smith Electric Generating Plant. This request is pursuant to a personnel change within Gulf Power for the Vice-President, Power Generation from Gene L. Ussery, Jr. to Penny M. Manuel.

If you have any questions or need further information regarding this change of Responsible Official for the Lansing Smith Electric Generating Plant, please call me at (850) 444-6527.

Sincerely,

A handwritten signature in black ink that reads "Dwain Waters, QEP". The signature is stylized and cursive.

G. Dwain Waters, QEP
Air Quality Programs Supervisor

cc: w/att: Jim Vick, Gulf Power Company
Johnny Howze, Gulf Power Company
Michael Burroughs, Gulf Power Company
Marie Largilliere, Gulf Power Company
Brian Toth, Southern Company Services
Gary Perko, HGS

