

Friday, Barbara

From: Forney.Kathleen@epamail.epa.gov
Sent: Tuesday, August 14, 2007 10:19 AM
To: Friday, Barbara
Cc: Little.James@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov
Subject: Re: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

We received this permit... Thanks

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

8/14/2007

Friday, Barbara

To: gdwaters@southernco.com; 'tdavis@ectinc.com'; Bradburn, Rick; little.james@epa.gov; forney.kathleen@epa.gov
Cc: Holtom, Jonathan
Subject: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant
Attachments: FinlNotc0330045-018-AC.pdf; 0330045-018-AC Appendix.pdf; 0330045-018-AC Final Permit.pdf; FinalACPermitSignaturePage.pdf; FINLDET 0330045-018-AC-F.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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Thank you,

DEP, Bureau of Air Regulation

8/13/2007

Friday, Barbara

From: System Administrator
To: Bradburn, Rick
Sent: Monday, August 13, 2007 2:39 PM
Subject: Delivered:FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

Your message

To: 'gdwaters@southernco.com'; 'tdavis@ectinc.com'; Bradburn, Rick; 'little.james@epa.gov'; 'forney.kathleen@epa.gov'
Cc: Holtom, Jonathan
Subject: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant
Sent: 8/13/2007 2:39 PM

was delivered to the following recipient(s):

Bradburn, Rick on 8/13/2007 2:39 PM

Friday, Barbara

From: Exchange Administrator
Sent: Monday, August 13, 2007 2:39 PM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)

Attachments: ATT141524.txt; FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant



ATT141524.txt
(284 B)



FINAL AC Permit
No.: 0330045-0...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

tdavis@ectinc.com

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]
Sent: Monday, August 13, 2007 2:38 PM
To: Friday, Barbara
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(692 B)



Message
Headers.txt (2 KB)

This is the mail system at host mseive02.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<forney.kathleen@epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK,
sent 46C0A4F8_13628_26679_6

<little.james@epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent
46C0A4F8_13628_26679_6

Friday, Barbara

From: Tom Davis [tdavis@ectinc.com]
Sent: Monday, August 13, 2007 2:41 PM
To: Friday, Barbara
Subject: RE: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Monday, August 13, 2007 2:39 PM
To: gdwaters@southernco.com; tdavis@ectinc.com; Bradburn, Rick; little.james@epa.gov; forney.kathleen@epa.gov
Cc: Holtom, Jonathan
Subject: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

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Thank you,

DEP, Bureau of Air Regulation

Friday, Barbara

From: Bradburn, Rick
To: Friday, Barbara
Sent: Monday, August 13, 2007 2:45 PM
Subject: Read: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

Your message

To: 'gdwaters@southernco.com'; 'tdavis@ectinc.com'; Bradburn, Rick; 'little.james@epa.gov'; 'forney.kathleen@epa.gov'
Cc: Holtom, Jonathan
Subject: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant
Sent: 8/13/2007 2:39 PM

was read on 8/13/2007 2:45 PM.

Friday, Barbara

From: Mailer-Daemon@ectinc.com
Sent: Monday, August 13, 2007 2:48 PM
To: Friday, Barbara
Subject: Confirm: 'FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant' received

A message which requested delivery confirmation recently arrived at this server. This server honors all delivery confirmation requests whether generated from local mail traffic or from mail received via an outside source (such as SMTP/POP).

Message-ID: <1900D374FE4CCB4AB8DEB001320338BABA7E06@tlhexsmb5.floridadep.net>
To : tdavis@ectinc.com
From : Barbara.Friday@dep.state.fl.us
Subject : FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant
Date : Mon, 13 Aug 2007 14:38:40 -0400

Receiving Domain: ectinc.com

Friday, Barbara

From: Waters, G. Dwain [GDWATERS@southernco.com]
Sent: Monday, August 13, 2007 2:56 PM
To: Friday, Barbara; TDAVIS@ECTINC.COM; Bradburn, Rick; little.james@epa.gov; forney.kathleen@epa.gov
Cc: Holtom, Jonathan
Subject: Re: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

Gulf Power has received the permit. Thanks, Dwain

Dwain Waters, QEP

-----Original Message-----

From: Friday, Barbara <Barbara.Friday@dep.state.fl.us>
To: Waters, G. Dwain; tdavis@ectinc.com <tdavis@ectinc.com>; Bradburn, Rick <Rick.Bradburn@dep.state.fl.us>; little.james@epa.gov <little.james@epa.gov>; forney.kathleen@epa.gov <forney.kathleen@epa.gov>
CC: Holtom, Jonathan <Jonathan.Holtom@dep.state.fl.us>
Sent: Mon Aug 13 13:38:40 2007
Subject: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,

DEP, Bureau of Air Regulation

Friday, Barbara

From: Waters, G. Dwain [GDWATERS@southernco.com]
To: Friday, Barbara
Sent: Monday, August 13, 2007 2:56 PM
Subject: Read: FINAL AC Permit No.: 0330045-018-AC - Gulf Power Company - Crist Energy Generating Plant

Your message

To: GDWATERS@southernco.com
Subject:

was read on 8/13/2007 2:56 PM.

Friday, Barbara

From: Terry, Greg N. [GNTERRY@southernco.com]
To: undisclosed-recipients
Sent: Monday, August 13, 2007 5:05 PM
Subject: Read: FINAL Title V Permit Revision No.: 0330045-016-AV - Gulf Power Company - Crist Electric Generating Plant

Your message

To: GNTERRY@southernco.com
Subject:

was read on 8/13/2007 5:05 PM.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Mr. G. Dwain Waters, Q.E.P.
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Air Permit No. 0330045-018-AC
Crist Electric Generating Plant
Escambia County

Enclosed is Final Permit Number 0330045-018-AC. This permit authorizes the rebuild of the electrostatic precipitators (ESP) for units 4 and 5 at the existing Crist Generating Station. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Determination and the Final Permit) was sent by e-mail with return receipt requested before the close of business on 8/13/07 to the persons listed:

Mr. G. Dwain Waters, Gulf Power Company (gdwaters@southernco.com)

Mr. Tom Davis, ECT (tdavis@ectinc.com)

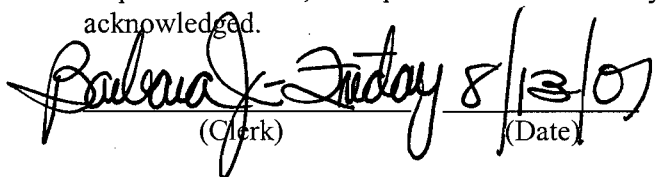
Mr. Rick Bradburn, NWD (rick.bradburn@dep.state.fl.us)

Mr. Jim Little, EPA Region 4 (little.james@epa.gov)

Ms Katy Forney, EPA Region 4 (forney.kathleen@epa.gov)

Clerk Stamp

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


(Clerk) 8/13/07 (Date)

FINAL DETERMINATION

Gulf Power Company
Crist Electric Generating Plant
Air Permit No. 0330045-018-AC

The Department distributed a public notice package on July 24, 2007, to authorize the rebuilding of the hot-side electrostatic precipitators for units 4 and 5 at the Gulf Power Crist Electric Generating Plant, which is located on Pate Road, off of 10 Mile Road on Governors Bayou, Escambia County. The Public Notice of Intent to Issue was published in The Pensacola News Journal on July 27, 2007.

COMMENTS/CHANGES

No comments were received from the public during the 14-day public comment period; however, minor comments were received from the applicant and the permit was changed as shown below. Deletions are indicated by a ~~strike through~~ and additions are indicated by a double underline.

Comment 1. Section 3. Emissions Unit Specific Condition # 4, Project Schedule; Page 5 of 6. The item references specific schedules for Unit 4 and 5. It should be noted that these dates are tentative and are subject to be revised based on unit, plant and system operating needs and conditions. In addition, Gulf believes that specific outage schedules should not be noted in a public document which may allow a "competitive advantage" to players in the energy market. This statement is based upon recent rulings by FERC regarding "Separation Protocol".

Response 1. The Department understands the applicant's concerns and has changed condition 4 as follows:

4. Project Schedule: Unit 5 is scheduled for the ESP maintenance and upgrade during ~~September~~, 2007. Unit 4 is scheduled for the ESP maintenance and upgrade during ~~January~~, 2008. [Applicant Request]

Comment 2. Section 4. Appendix SC, Standard Conditions: For clarification purposes, it should be noted that Plant Crist has several items which meet the qualifying standard condition statement: "Unless otherwise specified by the permit or rule, the following conditions apply to all emissions units and activities at this facility."

- Item 3. Excess Emissions Allowed: Condition does not apply to Plant Crist for startup and shutdown for 2 hours in any 24 hour period.
- Item 7. General Visible Rule of 20% opacity does not apply to many of the Crist generating units.

Response 2. Appendix SC contains standard conditions that generally apply to all construction permitting projects. The items in the Title V permit that fall under the "Unless otherwise specified by the permit or rule..." language are not in any way affected by this construction permit. Your comment is noted, but no changes are required to this permit.

CONCLUSION

The final action of the Department is to issue the final permit with the changes noted above.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE

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

Authorized Representative:

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

Crist Electric Generating Plant
Units 4 & 5 ESP Rebuild Project
Facility ID No. 0330045
SIC No. 4911
Air Permit No. 0330045-018-AC
Permit Expires: December 31, 2009

PROJECT AND LOCATION

This permit authorizes the construction/rebuild of the hot-side electrostatic precipitators (ESP) for Units 4 and 5 at the existing Crist Electric Generating Station, which is located on Governors Bayou off of 10 Mile Road in Pensacola, Escambia County, Florida. The map coordinates are: Zone 16; 478.50 km East; and 3381.30 km North.

STATEMENT OF BASIS

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

CONTENTS

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

Joseph Kahn, Director
Division of Air Resource Management

(Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

The existing plant consists of four fossil fuel fired steam generators and two fly ash silos. Pulverized coal is the primary fuel for Units 4, 5, 6 and 7. Natural gas, fuel oil and on-specification used oil are used as supplemental fuels in all four of the units.

The following units are affected by this air construction permit.

ID	Emission Unit Description
004	Boiler No. 4 (Phase I and II Acid Rain Unit)
005	Boiler No. 5 (Phase I and II Acid Rain Unit)

The project addressed by this permitting action is the rebuild of the hot-side electrostatic precipitators (ESP) for Units 4 and 5.

REGULATORY CLASSIFICATION

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

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

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

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

RELEVANT DOCUMENTS

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

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct, modify, or operate emissions units at this facility shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (Department) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all permit applications shall also be sent to the Compliance Authority.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northwest District Office at 160 Governmental Center, Pensacola, Florida 32502-5794.
3. Appendices: The following Appendices are attached as part of this permit: Appendix CF (Citation Format); Appendix GC (General Conditions); and, Appendix SC (Standard Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-4, 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Construction Approval: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Rule 62-210.200, F.A.C. defines *construction* as, "The act of performing on-site fabrication, erection, installation or modification of an emissions unit or facility of a permanent nature, including installation of foundations or building supports; laying of underground pipe work or electrical conduit; and fabrication or installation of permanent storage structures, component parts of an emissions unit or facility, associated support equipment, or utility connections. Land clearing and other site preparation activities are not a part of the construction activities." Such permits shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes construction/rebuild of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions units. Due to the minor nature of the Title V permit revisions that will be required following the changes authorized by this permit, a requested revision to accurately describe the rebuilt ESP shall be included with the next application for Title V permit (revision or renewal). [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Emissions Units 004 & 005

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

ID	Emission Unit Description
004	Boiler No. 4 (Phase I and II Acid Rain Unit)
005	Boiler No. 5 (Phase I and II Acid Rain Unit)

Description: Unit 4 is a Combustion Engineering tangentially fired, dry bottom boiler that began commercial operation on July 1, 1959. Unit 5 is a Combustion Engineering tangentially fired, dry bottom boiler that began commercial operation on June 1, 1961.

Fuels: Coal, natural gas, new No. 2 fuel oil and/or on-specification used oil, biomass, and occasional on-site generated "oil contaminated soil".

Capacity: Each unit is rated for 1,096.7 million British thermal units per hour (MMBtu/hour) when firing pulverized coal, natural gas, No. 2 fuel oil, or on-specification used oil; and, 40.2 MMBtu/hr when firing biomass.

Particulate Matter (PM) Controls: Hot-side and cold-side electrostatic precipitators (ESP).

Nitrogen Oxide (NO_x) Controls: Low NO_x burners and selective non-catalytic reduction (SNCR).

Continuous Monitors: Carbon dioxide (CO₂), NO_x, sulfur dioxide (SO₂), opacity, stack gas flow, and urea injection rate.

Stack Parameters: Units 4 shares a common stack with Unit 5 that is 450 feet tall with a diameter of 18.0 feet. The volumetric flow rate of Unit 4 & 5 combined, at permitted capacity, is approximately 596,012 acfm.

{Permitting Notes: Based on the current Title V air operation permit, Units 4 and 5: are regulated under Rule 62-296.405, F.A.C. (Fossil Fuel Fired Steam Generators > 250 MMBtu/Hour Heat Input); predate the requirements of Rule 62-212.400, F.A.C. (PSD Preconstruction Review); and are regulated under Phase I and Phase II of the federal Acid Rain Program (40 CFR 75).}

PREVIOUS APPLICABLE REQUIREMENTS

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

EQUIPMENT AND CONSTRUCTION

2. Hot-side Electrostatic Precipitators: The permittee is authorized to rebuild the hot-side ESP on Units 4 and 5. Each unit is currently composed of a two-chamber single casing with three (3), 9-foot mechanical fields consisting of a Buell "BA" design with weighted wire discharge electrodes. In general, the rebuild will consist of the following work. The internals of the Unit 4 and 5 casings will be rebuilt in Buell "BA" configuration with GE ENERGY ESP-3 collecting plates and RDE-1 rigid discharge electrodes. New switch mode power supply (SMPS) units will be installed for each casing. The existing rappers and vibrators will be replaced with GE ENERGY electromagnetic impact rappers. The existing casing, hoppers, box beams, and collecting plate support frame pivot points will be reused. GE ENERGY will also supply new insulator compartments and mini penthouses, as well as hopper doors for both units. New hot roof panels and new internal water wash systems will also be installed. The roof panels are designed to fit within the existing box beams and will be pre-punched for the roof penetrations. [Design; Applicant Request.]
3. Updated Designs: The permittee shall update the Department with final design specifications and any

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Emissions Units 004 & 005

substantial changes made to the final design specifications during the actual construction phase. [Rule 62-4.070(3), F.A.C.]

4. Project Schedule: Unit 5 is scheduled for the ESP maintenance and upgrade during 2007. Unit 4 is scheduled for the ESP maintenance and upgrade during 2008. [Applicant Request]

PERFORMANCE REQUIREMENTS

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

EMISSIONS STANDARDS

{Permitting Note: All existing emissions limits remain in effect.}

EMISSIONS PERFORMANCE TESTING

5. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification shall include: the scheduled date, approximate start time, test team, contact name and phone number, description of unit to be tested, and the tests to be performed. [Rule 62-297.310(7)(a)9, F.A.C.]
6. Particulate Matter (PM) Compliance Tests: Within 60 days after completing the rebuild of the ESP and bringing Units 4 and 5 back on line, the permittee shall conduct tests to demonstrate compliance with the PM limits. Test data shall be collected for at least three one-hour test runs. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

RECORDS AND REPORTS

7. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the provisions of Rule 62-297.310(8), F.A.C. For each required test run, the report shall indicate the actual heat input rate (MMBtu/hour) and the PM emission rate (lb/MMBtu). The report shall also include copies of the continuous opacity monitoring results recorded during the tests and a statement that a revised ESP description will be provided with the next application for Title V permit (revision or renewal). [Rule 62-297.310(8) & 62-213.440, F.A.C.]

SECTION 4. APPENDICES)

Appendix CF - Citation Format;
Appendix GC - General Conditions; and,
Appendix SC - Standard Conditions

SECTION 4. APPENDIX CF
CITATION FORMATS

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

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number
“001” identifies the specific permit project
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CRF 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX GC
GENERAL CONDITIONS

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

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

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

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

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

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

SECTION 4. APPENDIX GC
GENERAL CONDITIONS

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

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable to project);
 - b. Determination of Prevention of Significant Deterioration (not applicable to project); and
 - c. Compliance with New Source Performance Standards (not applicable to project).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX SC
STANDARD CONDITIONS

Unless otherwise specified by permit or rule, the following conditions apply to all emissions units and activities at this facility.

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Unless otherwise specified in the permit, excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
7. General Visible Emissions: Unless otherwise specified in the permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. [Rule 62-296.320(4)(b)1, F.A.C.]
8. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

9. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
10. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted

SECTION 4. APPENDIX SC
STANDARD CONDITIONS

capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

11. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
12. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. *Required Sampling Time*. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - b. *Minimum Sample Volume*. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. *Calibration of Sampling Equipment*. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

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

13. Determination of Process Variables

- a. *Required Equipment*. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. *Accuracy of Equipment*. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

14. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
15. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
16. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
17. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

SECTION 4. APPENDIX SC
STANDARD CONDITIONS

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]


RECORDS AND REPORTS


18. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
19. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(3), F.A.C.]

Memorandum

Florida Department of Environmental Protection

TO: Joseph Kahn

THRU: Trina Vielhauer
Jeff Koerner 

FROM: Jonathan Holtom 

DATE: August 10, 2007

SUBJECT: Project No. 0330045-018-AC
Final Construction Permit For Gulf Power Crist
Rebuild of Units 4 and 5 Electrostatic Precipitators (ESP)

Attached for your approval and signature is a final construction permit for Gulf Power's Crist Electric Generating Plant. This permit authorizes the rebuild of the ESP for units 4 and 5.

The Public Notice requirements were met on July 27 by publishing in the Pensacola News Journal. No comments were received from the public, but minor comments were received from the applicant, in response to this Public Notice. No petitions were filed for an Administrative Hearing.

I recommend your approval and signature.

Attachments

TLV/jk/jh

One Energy Place
Pensacola, Florida 32520

850.505.5111

RECEIVED

AUG 06 2007

BUREAU OF AIR REGULATION

Certified Mail



August 2, 2007

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

Dear Mr.Holtom:

RE: CRIST ELECTRIC GENERATION FACILITY
DEP File No. 0330045-018-AC
Intent to Issue Crist 4 & 5 ESP Construction Permit - Public Notice Affidavit

Attached, please find Gulf Power's proof of publication, i.e., newspaper affidavit regarding the Public Notice of Intent to Issue Draft Crist 4 & 5 ESP Upgrade Construction Permit originally sent to Penny M. Manuel (Gulf Power) on July 24, 2007. An electronic (pfd) version of this affidavit was sent you earlier today.

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

Sincerely,

G. Dwain Waters, Q.E.P.
Special Projects and Environmental Assets Coordinator

Cc: Jim Vick, Gulf Power Company
Terry Wright, Gulf Power Company
John Dominey, Gulf Power Company
Rick Bradburn, FDEP, Northwest District

PENSACOLA
**News
Journal**
Informed. In Tune. In Touch.

Published Daily-Pensacola, Escambia County, FL

PROOF OF PUBLICATION

State of Florida

County of Escambia:

Before the undersigned authority personally appeared **Claudia Wysocki-Ables** who on oath, says that she is a personal representative of the Pensacola News Journal, a daily newspaper published in Escambia County, Florida; that the attached copy of advertisement, being a Legal in the matter of:

Notice of Intent

Was published in said newspaper in the issue(s) of:

July 27, 2007

Affiant further says that the said Pensacola News Journal is a newspaper published in said Escambia County, Florida, and that the said newspaper has heretofore been published in said Escambia County, Florida, and has been entered as second class matter at the Post Office in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this 28th Day of July, 2007, by **CLAUDIA C. WYSOCKI-ABLES** who Is personally known to me.

Claudia Wysocki-Ables Affiant

Nikki E. Nichols Notary Public

NIKKI E. NICHOLS
Notary Public-State of FL
Comm. Exp. Aug. 01, 2009
Comm. No. DD 427341

RECEIVED

AUG 06 2007

BUREAU OF AIR REGULATION

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Bureau of Air Regulation
Florida Department of Environmental Protection
Draft Air Permit No. 0330045-018-AC
Gulf Power Company, Crist Electric Generating Plant
Escambia County, Florida

Applicant: The applicant for this project is Gulf Power Company. The applicant's authorized representative and mailing address is: Mr. G. Dwain Waters, Q.E.P., Air Quality Programs Supervisor, Gulf Power Company, One Energy Place, Pensacola, Florida 32520.

Facility Location: Gulf Power Company operates the existing Crist Electric Generating Plant, which is located on Pate Road, off of 10 Mile Road on Governors Bayou in Pensacola, Escambia County, Florida.

Project: The applicant proposes to rebuild the hot-side electrostatic precipitators (ESPs) for Units 4 & 5 at the existing plant, which control particulate matter emissions. Plans for the rebuild include using the existing ESP cabinets and replacing the existing wire and plate assembly with rigid discharge electrodes and new collection plates. The project to rebuild the ESPs requires a minor source air construction permit, but it is not expected to result in an increase in any emissions. The rebuild is being performed during the next scheduled ESP maintenance activity as a way to assure continued compliance with the existing emissions limits.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination regarding this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mall Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

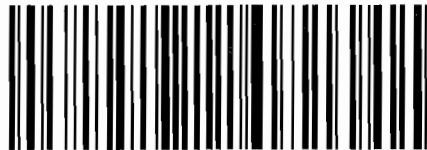
A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact, if there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of the alleged facts related to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

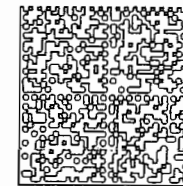
Mediation: Mediation is not available for this proceeding.



One Energy Place
Pensacola FL 32520



7006 2150 0000 9239 3173



HASLER \$5.21
AUG 02 2007
US POSTAGE
First-Class Mail
MAILED FROM 32520
011A0413000930

Jonathan Holtom
FDEP, Div. of Air Resources Mgmt.
2600 Blair Stone Road
Mail Station #5510
Tallahassee, FL 32339-2400

323999#6542 0001



Friday, Barbara

From: Harvey, Mary
Sent: Friday, July 13, 2007 12:57 PM
To: Adams, Patty
Subject: FW: Gulf Power Company - 0330045-018-AC

Attachments: 0330045-018-AC Appendix.PDF; 0330045-018-AC Draft Permit.PDF; 0330045-018-AC Intent.PDF; 0330045-018-AC TEPD.PDF; Signed documents - Permit #0330045-018-AC-DRAFT.pdf



0330045-018-AC Appendix.PDF (7...



0330045-018-AC Draft Permit.PD...



0330045-018-AC Intent.PDF (69 ...



0330045-018-AC TEPD.PDF (107 K...



Signed documents - Permit #033...

-----Original Message-----

From: Forney.Kathleen@epamail.epa.gov [mailto:Forney.Kathleen@epamail.epa.gov]
Sent: Friday, July 13, 2007 11:06 AM
To: Harvey, Mary
Subject: Fw: Gulf Power Company - 0330045-018-AC

Thanks for the permit Mary,
Katy

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

----- Forwarded by Kathleen Forney/R4/USEPA/US on 07/13/2007 11:05 AM

Gregg
Worley/R4/USEPA/
US

07/10/2007 03:39
PM

To
James Little/R4/USEPA/US@EPA,
Gracy Danois/R4/USEPA/US@EPA,
Kathleen Forney/R4/USEPA/US@EPA

cc

Subject

Fw: Gulf Power Company -
0330045-018-AC

Gregg M. Worley
Chief, Air Permits Section
U.S. EPA Region 4
(404) 562-9141
fax (404) 562-9019

CONFIDENTIALITY NOTICE:

This electronic message, including attachments, may contain information that is proprietary, privileged, or confidential and exempt from disclosure. If you are not the intended recipient of this message, you may not disclose, forward, distribute, copy, or use this message or its contents. If you have received this communication in error, please notify the sender immediately by electronic mail and delete the original message and all copies of this message from your system. Thank you.

----- Forwarded by Gregg Worley/R4/USEPA/US on 07/10/2007 03:38 PM -----

"Harvey, Mary"
<Mary.Harvey@dep.state.fl.us>

07/10/2007 03:17 PM

To
Gregg Worley/R4/USEPA/US@EPA cc

"Holtom, Jonathan"
<Jonathan.Holtom@dep.state.fl.us>
, "Adams, Patty"
<Patty.Adams@dep.state.fl.us>

Subject
FW: Gulf Power Company -
0330045-018-AC

From: Harvey, Mary
Sent: Tuesday, July 10, 2007 2:57 PM
To: 'Mr. G. Dwain Waters, Gulf Power Company'; 'Mr. Tom Davis, ECT'; Bradburn, Rick; 'Mr. Gregg Worley, EPA Region 4'
Cc: Holtom, Jonathan; Adams, Patty; Gibson, Victoria
Subject: Gulf Power Company - 0330045-018-AC

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through

the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,
DEP, Bureau of Air Regulation

(See attached file: 0330045-018-AC Appendix.PDF) (See attached file: 0330045-018-AC Draft Permit.PDF) (See attached file: 0330045-018-AC Intent.PDF) (See attached file: 0330045-018-AC TEPD.PDF) (See attached file: Signed documents - Permit #0330045-018-AC-DRAFT.pdf)

Friday, Barbara

From: Harvey, Mary
Sent: Wednesday, July 11, 2007 9:22 AM
To: Adams, Patty
Subject: FW: Gulf Power Company - 0330045-018-AC

From: Bradburn, Rick
Sent: Tuesday, July 10, 2007 4:47 PM
To: Harvey, Mary
Subject: Read: Gulf Power Company - 0330045-018-AC

Your message

To: 'Mr. G. Dwain Waters, Gulf Power Company'; 'Mr. Tom Davis, ECT'; Bradburn, Rick; 'Mr. Gregg Worley, EPA Region 4'
Cc: Holtom, Jonathan; Adams, Patty; Gibson, Victoria
Subject: Gulf Power Company - 0330045-018-AC
Sent: 7/10/2007 2:57 PM

was read on 7/10/2007 4:47 PM.

Friday, Barbara

From: Harvey, Mary
Sent: Tuesday, July 10, 2007 2:57 PM
To: 'Mr. G. Dwain Waters, Gulf Power Company'; 'Mr. Tom Davis, ECT'; Bradburn, Rick; 'Mr. Gregg Worley, EPA Region 4'
Cc: Holtom, Jonathan; Adams, Patty; Gibson, Victoria
Subject: Gulf Power Company - 0330045-018-AC
Attachments: 0330045.018.AC.D_pdf.zip

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

7/24/2007

Friday, Barbara

From: Harvey, Mary
Sent: Tuesday, July 10, 2007 3:50 PM
To: Holtom, Jonathan; Adams, Patty
Subject: FW: Gulf Power Company - 0330045-018-AC

From: Tom Davis [mailto:tdavis@ectinc.com]
Sent: Tuesday, July 10, 2007 3:47 PM
To: Harvey, Mary
Subject: RE: Gulf Power Company - 0330045-018-AC

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Tuesday, July 10, 2007 2:57 PM
To: Mr. G. Dwain Waters, Gulf Power Company; Mr. Tom Davis, ECT; Bradburn, Rick; Mr. Gregg Worley, EPA Region 4
Cc: Holtom, Jonathan; Adams, Patty; Gibson, Victoria
Subject: Gulf Power Company - 0330045-018-AC

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

DEP, Bureau of Air Regulation

7/24/2007

Friday, Barbara

From: Harvey, Mary
Sent: Tuesday, July 10, 2007 3:17 PM
To: 'Mr. Gregg Worley, EPA Region 4'
Cc: Holtom, Jonathan; Adams, Patty
Subject: FW: Gulf Power Company - 0330045-018-AC
Attachments: 0330045-018-AC Appendix.PDF; 0330045-018-AC Draft Permit.PDF; 0330045-018-AC Intent.PDF; 0330045-018-AC TEPD.PDF; Signed documents - Permit #0330045-018-AC-DRAFT.pdf

From: Harvey, Mary
Sent: Tuesday, July 10, 2007 2:57 PM
To: 'Mr. G. Dwain Waters, Gulf Power Company'; 'Mr. Tom Davis, ECT'; Bradburn, Rick; 'Mr. Gregg Worley, EPA Region 4'
Cc: Holtom, Jonathan; Adams, Patty; Gibson, Victoria
Subject: Gulf Power Company - 0330045-018-AC

Dear Sir/Madam:

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The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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Thank you,

DEP, Bureau of Air Regulation

7/24/2007



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 10, 2007

Mr. G. Dwain Waters, Q.E.P.
Air Quality Programs Supervisor
Gulf Power Company
One Energy Place
Pensacola, Florida 32520

Re: Air Construction Permit No. 0330045-018-AC
Gulf Power Company - Crist Electric Generating Plant
Units 4 and 5 ESP Rebuild Project

Dear Mr. Waters:

On June 8, you submitted an application for an air permit, on behalf of Gulf Power Company, to rebuild the hot-side electrostatic precipitators (ESPs) on Units 4 and 5 at the existing Crist Electric Generating Plant, which is located on Pate Road, off of 10 Mile Road on Governors Bayou, Escambia County. Enclosed are the following documents: "Technical Evaluation and Preliminary Determination", "Draft Permit", "Written Notice of Intent to Issue Air Permit", and "Public Notice of Intent to Issue Air Permit".

The "Technical Evaluation and Preliminary Determination" summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft Permit. The proposed "Draft Permit" includes the specific conditions that regulate the emissions units covered by the proposed project. The "Written Notice of Intent to Issue Air Permit" provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation. The "Public Notice of Intent to Issue Air Permit" is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Jonathan Holtom, P.E., at (850) 921-9531.

Sincerely,

Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/jh

Enclosures

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of the alleged facts related to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation: Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent electronically (with received receipt requested) before the close of business on 7/10/07 to the persons listed below.

Mr. G. Dwain Waters, Gulf Power Company (gdwaters@southernco.com)

Mr. Tom Davis, ECT (tdavis@ectinc.com)

Mr. Rick Bradburn, NWD (rick.bradburn@dep.state.fl.us)

Mr. Gregg Worley, EPA Region 4 (worley.gregg@epa.gov)

Clerk Stamp

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



(Clerk)

7/10/07
(Date)

Florida Department of
Environmental Protection

Memorandum

TO: Trina Vielhauer, Chief - Bureau of Air Regulation
THROUGH: Jeff Koerner, Air Permitting North *JK*
FROM: Jonathan Holtom, Air Permitting North *JH*
DATE: 6/27/07
SUBJECT: Draft Air Construction Permit No. 0330045-018-AC
Gulf Power Company, Crist Electric Generating Plant
Units 4 and 5 Hot-side ESP Rebuild Project

Attached for your review are the following items:

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

The P.E. certification briefly summarizes the proposed permit project. The Technical Evaluation and Preliminary Determination provide a detailed description of the project, rationale, and conclusion. I recommend your approval of the attached Draft Permit for this project.

Attachments



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

P.E. Certification Statement

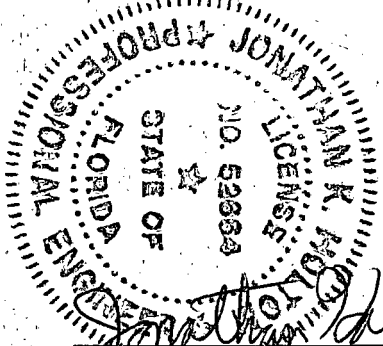
Permittee:

Gulf Power Company
Crist Electric Generating Plant

DRAFT Construction Permit No. 0330045-018-AC
Facility ID No. 0330045

Project: This minor source air construction permit authorizes the rebuild of the hot-side ESPs for Units 4 and 5 during the next scheduled maintenance period. The upgrade will enhance the ability to reduce particulate matter before the new Crist scrubber and reduce mercury emissions. The upgrade will reduce maintenance and operational costs through new technology utilizing rigid discharge electrodes and a switch mode power supply. This technology will reduce arcing and sparking inherent in the existing wire-plate ESP configuration. The upgrade is designed to meet the original ESP efficiency rating of 99.1 percent. There will not be an increase in emissions or change in capacity at Unit 4 or 5 due to the ESP upgrades. Crist Unit 5 is scheduled for the ESP maintenance and upgrade during September, 2007. Crist Unit 4 is scheduled for the ESP maintenance and upgrade during January, 2008.

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



Jonathan K. Holtom, P.E.

Registration Number: 52664

6/28/07
Date

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

Mr. G. Dwain Waters, Q.E.P.
Air Quality Programs Supervisor
Gulf Power Company
One Energy Place
Pensacola, Florida 32520

Draft Air Permit No. 0330045-018-AC
Crist Electric Generating Plant
Units 4 and 5 ESP Rebuild Project
Escambia County, Florida

Facility Location: The applicant, Gulf Power Company, operates the Crist Electric Generating Plant, which is located on Pate Road, off of 10 Mile Road on Governors Bayou in Pensacola, Escambia County, Florida.

Project: The applicant proposes to rebuild the hot-side electrostatic precipitators (ESPs) for Units 4 & 5 at the existing plant. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 S. Magnolia Drive, Tallahassee, Florida, 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida, 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven (7) days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of the Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Bureau of Air Regulation
Florida Department of Environmental Protection
Draft Air Permit No. 0330045-018-AC
Gulf Power Company, Crist Electric Generating Plant
Escambia County, Florida

Applicant: The applicant for this project is Gulf Power Company. The applicant's authorized representative and mailing address is: Mr. G. Dwain Waters, Q.E.P., Air Quality Programs Supervisor, Gulf Power Company, One Energy Place, Pensacola, Florida 32520.

Facility Location: Gulf Power Company operates the existing Crist Electric Generating Plant, which is located on Pate Road, off of 10 Mile Road on Governors Bayou in Pensacola, Escambia County, Florida.

Project: The applicant proposes to rebuild the hot-side electrostatic precipitators (ESPs) for Units 4 & 5 at the existing plant, which control particulate matter emissions. Plans for the rebuild include using the existing ESP cabinets and replacing the existing wire and plate assembly with rigid discharge electrodes and new collection plates. The project to rebuild the ESPs requires a minor source air construction permit, but it is not expected to result in an increase in any emissions. The rebuild is being performed during the next scheduled ESP maintenance activity as a way to assure continued compliance with the existing emissions limits.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination regarding this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S.; however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of the alleged facts related to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation: Mediation is not available for this proceeding.

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

Draft Air Construction Permit No. 0330045-018-AC
Crist Units 4 and 5 ESP Rebuild Project

COUNTY

Escambia County

APPLICANT

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

**PERMITTING
AUTHORITY**

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
North Permitting Section



June 29, 2007

1. GENERAL PROJECT INFORMATION

Applicant Name and Address

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

Authorized Representative:

G. Dwain Waters

Processing Schedule

06/08/07 Received the application for a pollution control rebuild project.

Facility Description and Location

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

Standard Industrial Classification Code (SIC)

SIC No. 4911 – Electrical Services

Regulatory Categories

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

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

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

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

Project Description

On June 8, 2007, Gulf Power Company submitted an application to rebuild the hot-side electrostatic precipitators (ESPs) for Units 4 and 5. The Crist Electric Generating Plant is subject to the Clean Air Interstate Rule (CAIR) and the Clean Air Mercury Rule (CAMR). Additionally, Crist must comply with opacity and Compliance Assurance Monitoring (CAM) requirements. To assure continued compliance with these regulations, Gulf Power is proposing to upgrade the existing hot-side ESPs on Units 4 and 5 during the next scheduled maintenance period. The upgrade will enhance the ability to reduce particulate matter (PM) before the new wet scrubber. The upgrade will reduce maintenance and operational costs through new technology utilizing rigid discharge electrodes and a switch mode power supply (SMPS). This technology will reduce arcing and sparking inherent in the existing wire-plate ESP configuration. The upgrade is designed to meet the original ESP efficiency rating of 99.1 percent. There will not be an increase in emissions or change in capacity at Unit 4 or 5 due to the ESP upgrades. Crist Unit 5 is scheduled for the ESP maintenance and upgrade during September, 2007. Crist Unit 4 is scheduled for the ESP maintenance and upgrade during January, 2008.

2. APPLICABLE REGULATIONS

State Regulations

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

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

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

General PSD Applicability

The Department regulates major stationary sources in accordance with the Prevention of Significant Deterioration (PSD) program, Rule 62-212.400, F.A.C. A PSD review is required only in areas currently in attainment with the NAAQS or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant, or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories, or
- 5 tons per year of lead.

For new projects at PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates, defined in Rule 62-210.200(278), F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant". The applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability for Project

As previously described, the purpose of the project is to return the ESP to the original design collection efficiency of >99.1%. This should enhance removal and reduce PM loading to the proposed wet scrubber system, which is currently under construction. As a co-benefit, the ESP rebuild in combination with the wet scrubber project should reduce actual emissions of mercury. Therefore, this project is not subject to PSD preconstruction review because there will be no increase in emissions. A minor source air construction permit is required to authorize the work due to the extensive rebuild of the ESPs.

3. APPLICATION REVIEW

Emissions unit number -004 is a Combustion Engineering tangentially fired, dry bottom boiler designated as "Boiler Number 4". It is rated at a maximum heat input of 1,096.7 million Btu per hour (MMBtu/hour) when firing pulverized coal, natural gas, No. 2 fuel oil, or on-specification used oil. Emissions unit number -005 is a Combustion Engineering tangentially fired, dry bottom boiler designated as "Boiler Number 5". It is rated at a maximum heat input of 1,096.7 million Btu per hour (MMBtu/hour) when firing pulverized coal, natural gas, No. 2 fuel oil, or on-specification used oil. Units -004 and -005 can burn biomass up to 40.2 MMBtu/hr. Both units are Phase I Substitution and Phase II Acid Rain Units, pre-date PSD regulations, and are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Fired Steam Generators with more than 250 million Btu per Hour Heat Input. Unit -004 began commercial operation on July 1, 1959. Unit -005 began commercial operation on June 1, 1961. The generator nameplate rating for unit -004 is 93 MW. The generator nameplate rating for unit -005 is 93 MW.

PM emissions from units -004 and -005 are currently controlled by hot side (Buell Model # Bal. 2x34n333-4-3p) and cold side (Buell Model # 1.1x48k33-1p) electrostatic precipitators. Nitrogen oxide (NO_x) emissions from units -004 and -005 are controlled by low-NO_x burner tips and selective non-catalytic reduction (SNCR). The SNCR system is designed for a target NO_x reduction of 25% as measured across the SNCR unit inlet and outlet. The designed target ammonia slip level is 5 ppmv corrected to 3% oxygen (O₂) based on a 24-hour average. Units -004 and -005 share a common stack. Stack height = 450 feet, exit diameter = 18.0 feet, exit temperature = 290 °F, actual volumetric flow rate = 596,012 acfm.}

Currently, the Unit 4 and 5 hot-side ESPs are Buell "BA" designs with weighted wire discharge electrodes subject to the following inlet conditions:

Description	Value	Units
Gas Volume	515,000	acfm
Gas Temperature	675	°F
Inlet Dust Load (typical)	0.90	Gr/acf
Inlet Dust Load (maximum)	1.47	Gr/acf
Operating Pressure	-5	Inches w.c.
Heat Input to Boiler	800	MMBtu/hr

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Design Specifications.

The existing and proposed rebuilt precipitators have the following configuration:

Description	Existing Unit (4 or 5)	Rebuilt Unit (4 or 5)
Number of casings	1	1
Number of chambers per casing	2	2
Gas passage width (inches)	9	11
Number of passages per field	34	28
Number of mechanical fields	3 (Buell Panels)	3 (GE ENERGY ESP-3 Panels)
Field 1 (feet)	9 x 37	9 x 37
Field 2 (feet)	9 x 37	9 x 37
Field 3 (feet)	9 x 37	9 x 37
Total number of electrical frames in direction of gas flow	9	9
Number of discharge electrodes per electrical frame	4 wires x 34 gp	2 RDE's x 28 gp
Number of energized electrical fields in direction of gas flow	6 (2 chambers)	6 (2 chambers)
Collecting plate area per T/R (# of frames fed per T/R)	2 frames - 15,100 ft ² 4 frames - 30,200 ft ²	2 frames - 12,400 ft ² 4 frames - 24,800 ft ²
Quantity and size of T/R sets	6 - 45kV, 1,400mA	6 - SMPS 70kV, 1,000mA
Current density (maximum)	Fields 1, 2, & 3 - 45 μA/ft ² Fields 4, 5, & 6 - 90 μA/ft ²	Fields 1, 2, & 3 - 40 μA/ft ² Fields 4, 5, & 6 - 80 μA/ft ²
CE Rapping type	Impact rapper	EGR Electromagnetic
Number of CE rappers	54	108
CE Rapping density (average)	2,520 ft ² /rapper	1,100 ft ² /rapper
DE Rapping type	Vibrator	EGR Electromagnetic
Number of DE rappers	18	36
DE Rapping density	5,040 Lin. ft./rapper	1,100 Lin. ft./rapper
Total collecting plate area (ft²)	135,900	111,900
Treatment length (ft)	27	27
Aspect ratio	0.73	0.73
Specific collecting area, SCA (ft²/1,000 acfm @ 9 inch G.P.)	262	262
Specific collecting area, SCA (ft²/1,000 acfm @ 11 inch G.P.)	216	216
Gas velocity (ft/sec)	4.5	4.5
Treatment time	6	6

Scope of Work

Each unit is composed of a two-chamber single casing with three (3), 9-foot mechanical fields. The internals of the Unit 4 and 5 casings will be rebuilt in Buell "BA" configuration with GE ENERGY ESP-3 collecting plates and RDE-1 rigid discharge electrodes. New SMPS units will be provided for each casing. The existing rappers and vibrators will be replaced with GE ENERGY electromagnetic impact rappers.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The basis for the rebuild configuration is converting the weighted wire electrode system to one of a rigid design. To accomplish this, the gas passage width will be increased. The intent is to modify the current 9" spacing to 11" duct spacing. The 11" duct spacing is the maximum spacing increase practical, considering the minimal electrical clearances offered by the original design between the high-voltage frame and collecting system support components. New SMPS units will be supplied for both Unit 4 and Unit 5. The existing casing, hoppers, box beams, and collecting plate support frame pivot points will be reused. GE ENERGY will also supply new insulator compartments and mini penthouses, as well as hopper doors for both units. New hot roof panels and new internal water wash systems are included as options. The roof panels are designed to fit within the existing box beams and will be pre-punched for the roof penetrations.

Conclusion

Based on the application, the design specifications will result in no significant change in PM emissions or opacity levels. The new rigid discharge electrodes and switch mode power supply sets are expected to be more energy efficient and provide better long-term reliability in meeting the permitted emissions limits than the current design technology. Gulf Power believes that this new technology will provide better reliability and is anticipating an increase in Hg removal efficiency over the existing design. Upon completion of this rebuild project and satisfaction of the testing requirements contained in this permit, the construction permit conditions will become obsolete. The only item that will need to be updated in the Title V Operation Permit will be the model number and description of the rebuilt ESPs contained in the descriptive paragraph of the emission unit section for Units 4 and 5. Because of the minor nature of this revision, it is acceptable to the Department for the applicant to wait until the next time the Title V permit is opened to request this revision. It is not necessary to submit an application for a full Title V permit revision for a minor change in control device description.

4. PRELIMINARY DETERMINATION

The ESP rebuild project is based on the design and operation of conventional ESP air pollution control equipment. This type of air pollution control device is operating successfully on numerous coal-fired utility boilers throughout the world. The existing hot-side ESPs for Units 4 and 5 are in excess of 20 years old and are due for maintenance to assure continued compliance with the permitted PM emissions and opacity limits. Gulf Power is proposing to upgrade the design of the ESPs during the upcoming maintenance activity in order to more reliably and efficiently assure continued compliance with the emissions limits.

The Department makes a preliminary determination that the proposed project will comply with the terms of the Agreement and all existing applicable air pollution regulations. This determination is based on a technical review of the application, the preliminary design, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jonathan Holtom is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

PERMITTEE

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

Authorized Representative:

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

Crist Electric Generating Plant Units 4 & 5 ESP Rebuild Project Facility ID No. 0330045 SIC No. 4911 Air Permit No. 0330045-018-AC Permit Expires: December 31, 2009

PROJECT AND LOCATION

This permit authorizes the construction/rebuild of the hot-side electrostatic precipitators (ESPs) for Units 4 and 5 at the existing Crist Electric Generating Station, which is located on Governors Bayou off 10 Mile Road in Pensacola, Escambia County, Florida. The map coordinates are: Zone 16; 478.50 km East; and 3381.30 km North.

STATEMENT OF BASIS

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

CONTENTS

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

Joseph Kahn, Director
Division of Air Resource Management

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

The existing plant consists of four fossil fuel fired steam generators and two fly ash silos. Pulverized coal is the primary fuel for Units 4, 5, 6 and 7. Natural gas, fuel oil and on-specification used oil are used as supplemental fuels in all four of the units.

The following units are affected by this air construction permit.

ID	Emission Unit Description
004	Boiler No. 4 (Phase I and II Acid Rain Unit)
005	Boiler No. 5 (Phase I and II Acid Rain Unit)

The project addressed by this permitting action is the rebuild of the hot-side electrostatic precipitators (ESPs) for Units 4 and 5.

REGULATORY CLASSIFICATION

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

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

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

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

RELEVANT DOCUMENTS

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

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: All documents related to applications for permits to construct, modify, or operate emissions units at this facility shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (Department) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all permit applications shall also be sent to the Compliance Authority.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northwest District Office at 160 Governmental Center, Pensacola, Florida 32501-5794.
3. Appendices: The following Appendices are attached as part of this permit: Appendix CF (Citation Format); Appendix GC (General Conditions); and, Appendix SC (Standard Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-4, 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Construction Approval: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Rule 62-210.200, F.A.C. defines *construction* as, "The act of performing on-site fabrication, erection, installation or modification of an emissions unit or facility of a permanent nature, including installation of foundations or building supports; laying of underground pipe work or electrical conduit; and fabrication or installation of permanent storage structures, component parts of an emissions unit or facility, associated support equipment, or utility connections. Land clearing and other site preparation activities are not a part of the construction activities." Such permits shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes construction/rebuild of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions units. Due to the minor nature of the Title V permit revisions that will be required following the changes authorized by this permit, a requested revision to accurately describe the rebuilt ESPs shall be included with the next application for Title V permit (revision or renewal). [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION 3 EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

Emissions Units 004 & 005

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

ID	Emission Unit Description
004	Boiler No. 4 (Phase I and II Acid Rain Unit)
005	Boiler No. 5 (Phase I and II Acid Rain Unit)
<p><i>Description:</i> Unit 4 is a Combustion Engineering tangentially fired, dry bottom boiler that began commercial operation on July 1, 1959. Unit 5 is a Combustion Engineering tangentially fired, dry bottom boiler that began commercial operation on June 1, 1961.</p> <p><i>Fuels:</i> Coal, natural gas, new No. 2 fuel oil and/or on-specification used oil, biomass, and occasional on-site generated "oil contaminated soil".</p> <p><i>Capacity:</i> Each unit is rated for 1,096.7 MMBtu/hour when firing pulverized coal, natural gas, No. 2 fuel oil, or on-specification used oil; and, 40.2 MMBtu/hr when firing biomass.</p> <p><i>PM Controls:</i> Hot-side and cold-side electrostatic precipitators (ESPs).</p> <p><i>NO_x Controls:</i> Low NO_x burners and selective non-catalytic reduction (SNCR).</p> <p><i>Continuous Monitors:</i> CO₂, NO_x, SO₂, opacity, stack gas flow, and urea injection rate.</p> <p><i>Stack Parameters:</i> Units 4 shares a common stack with Unit 5 that is 450 feet tall with a diameter of 18.0 feet. The volumetric flow rate of Unit 4 & 5 combined, at permitted capacity, is approximately 596,012 acfm.</p> <p><i>{Permitting Notes: Based on the current Title V air operation permit, Units 4 and 5: are regulated under Rule 62-296.405, F.A.C. (Fossil Fuel Fired Steam Generators > 250 MMBtu/Hour Heat Input); predate the requirements of Rule 62-212.400, F.A.C. (PSD Preconstruction Review); and are regulated under Phase I and Phase II of the federal Acid Rain Program (40 CFR 75).}</i></p>	

PREVIOUS APPLICABLE REQUIREMENTS

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

EQUIPMENT AND CONSTRUCTION

2. Hot-side Electrostatic Precipitators: The permittee is authorized to rebuild the hot-side ESPs on Units 4 and 5. Each unit is currently composed of a two-chamber single casing with three (3), 9-foot mechanical fields consisting of a Buell "BA" design with weighted wire discharge electrodes. In general, the rebuild will consist of the following work. The internals of the Unit 4 and 5 casings will be rebuilt in Buell "BA" configuration with GE ENERGY ESP-3 collecting plates and RDE-1 rigid discharge electrodes. New switch mode power supply (SMPS) units will be installed for each casing. The existing rappers and vibrators will be replaced with GE ENERGY electromagnetic impact rappers. The existing casing, hoppers, box beams, and collecting plate support frame pivot points will be reused. GE ENERGY will also supply new insulator compartments and mini penthouses, as well as hopper doors for both units. New hot roof panels and new internal water wash systems will also be installed. The roof panels are designed to fit within the existing box beams and will be pre-punched for the roof penetrations. [Design; Applicant Request.]
3. Updated Designs: The permittee shall update the Department with final design specifications and any substantial changes made to the final design specifications during the actual construction phase. [Rule 62-4.070(3), F.A.C.]

SECTION 3 EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

Emissions Units 004 & 005

4. Project Schedule: Unit 5 is scheduled for the ESP maintenance and upgrade during September, 2007. Unit 4 is scheduled for the ESP maintenance and upgrade during January, 2008. [Applicant Request]

PERFORMANCE REQUIREMENTS

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

EMISSIONS STANDARDS

{Permitting Note: All existing emissions limits remain in effect.}

EMISSIONS PERFORMANCE TESTING

5. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification shall include: the scheduled date, approximate start time, test team, contact name and phone number, description of unit to be tested, and the tests to be performed. [Rule 62-297.310(7)(a)9, F.A.C.]
6. Particulate Matter (PM) Compliance Tests: Within 60 days after completing the rebuild of the ESPs and bringing Units 4 and 5 back on line, the permittee shall conduct tests to demonstrate compliance with the PM limits. Test data shall be collected for at least three one- hour test runs. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

RECORDS AND REPORTS

7. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the provisions of Rule 62-297.310(8), F.A.C. For each required test run, the report shall indicate the actual heat input rate (MMBtu/hour) and the PM emission rate (lb/MMBtu). The report shall also include copies of the continuous opacity monitoring results recorded during the tests and a statement that a revised ESP description will be provided with the next application for Title V permit (revision or renewal). [Rule 62-297.310(8) & 62-213.440, F.A.C.]

SECTION 4. APPENDICES (DRAFT)

Appendix CF - Citation Format;
Appendix GC - General Conditions; and,
Appendix SC - Standard Conditions

SECTION 4. APPENDIX CF (DRAFT)

CITATION FORMATS

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

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number
“001” identifies the specific permit project
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX GC (DRAFT)

GENERAL CONDITIONS

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

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

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

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

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

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

SECTION 4. APPENDIX GC (DRAFT)

GENERAL CONDITIONS

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

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable to project);
 - b. Determination of Prevention of Significant Deterioration (not applicable to project); and
 - c. Compliance with New Source Performance Standards (not applicable to project).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX SC (DRAFT)

STANDARD CONDITIONS

Unless otherwise specified by permit or rule, the following conditions apply to all emissions units and activities at this facility.

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Unless otherwise specified in the permit, excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
7. General Visible Emissions: Unless otherwise specified in the permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. [Rule 62-296.320(4)(b)1, F.A.C.]
8. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

9. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
10. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted

SECTION 4. APPENDIX SC (DRAFT)

STANDARD CONDITIONS

capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

11. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
12. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. *Required Sampling Time*. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - b. *Minimum Sample Volume*. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. *Calibration of Sampling Equipment*. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

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

13. Determination of Process Variables

- a. *Required Equipment*. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. *Accuracy of Equipment*. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

14. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
15. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
16. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
17. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

SECTION 4. APPENDIX SC (DRAFT)

STANDARD CONDITIONS

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

RECORDS AND REPORTS

18. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
19. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(3), F.A.C.]