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DIVISION OF AIR
RESOURCE MANAGEMENT

GULF POWER

A SOUTHERN COMPANY

Certified Mail
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December 17, 2012

Jonathan Holtom, P.E.
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Holtom: *Jon,*

RE: CRIST ELECTRIC GENERATING PLANT
REQUEST FOR ADDITIONAL INFORMATION (RAI) RESPONSE
TITLE V & AIR CONSTRUCTION PERMIT APPLICATION
File No: 0330045-036-AC & 0330045-037-AV

Gulf Power hereby submits our response to FDEP's letter dated December 10, 2012, regarding a request for additional information for the Crist Title V and Air Construction revision referenced above. Certifications by the Responsible Official and Professional Engineer are attached regarding Gulf's submission of this response.

Gulf Power is available to meet with the Department if you have additional questions or concerns regarding Gulf's request to revise the Crist Air Construction Permit (0330045-036-AC) or the incorporation of provisions into the Title V permit. Please call me at (850) 444-6527 or Greg Terry at (850) 444-6144 regarding any questions.

Sincerely,

G. Dwain Waters, Q.E.P.


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

cc: w/att: Jeff Koerner, FDEP – Tallahassee Office
Jora Maxwell, Gulf Power Company
Wright, Terry, Gulf Power Company
John Dominey, Gulf Power Company
Rusty Meharg, Gulf Power Company
Greg Terry, Gulf Power Company
Gary Perko, Hopping, Green & Sams

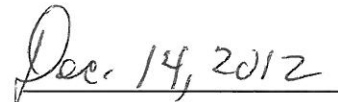
**GULF POWER RESPONSE TO FDEP'S REQUEST FOR
ADDITIONAL INFORMATION FOR CRIST AIR
CONSTRUCTION & TITLE V REVISION PROJECTS
(0330045-036-AC & 0330045-037-AV)
CERTIFICATION BY RESPONSIBLE OFFICIAL**

"I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Title V source for which this information is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in Gulf's response to FDEP's request for additional information for the Crist Air Construction and Title V Revision project is true, accurate and complete."

Responsible Official Signature:



Michael Burroughs
Vice-President, Power Generation and SPO

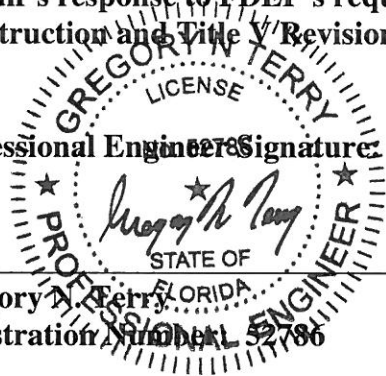


Date:

**GULF POWER RESPONSE TO FDEP'S REQUEST FOR
ADDITIONAL INFORMATION FOR CRIST AIR
CONSTRUCTION & TITLE V REVISION PROJECTS
(0330045-036-AC & 0330045-037-AV)
CERTIFICATION BY RESPONSIBLE OFFICIAL**

"I, the undersigned, am a registered professional engineer in the State of Florida and hereby certify to the best of my knowledge that all information being submitted in Gulf's response to FDEP's request for additional information for the Crist Air Construction and Title V Revision project is true, accurate and complete."

Professional Engineer's Signature:



**Gregory N. Terry,
Registration Number 52786**

12.17.2012

Date

**Gulf Response to Request for Additional Information (RAI)
Facility ID No: 0330045-036-AC & 0330045-037-AV
December 17, 2012**

Background: On December 10, 2012, Gulf received the following questions from FDEP:

FDEP Question #1. Additional information is needed for the following engines.

Gulf General Statement: Gulf included in the Air Permit Application #3338-1 under Emissions Unit #011. General Purpose Internal Combustion Engines, an updated “Crist Master List –RICE” document which contains relevant information required for determining the status of all of the internal combustion engines located at Plant Crist. The document included a regulatory analysis that indentified each applicable unit subject to NSPS CFR Subparts 60 IIII & JJJJ and NESHAPS CFR 63 Subpart ZZZZ. Gulf believes this analysis to be accurate and includes information regarding dates of purchase that we believe sufficient to determine rule applicability. In addition, Gulf specifically indentified in an attachment (“Request List for Title V Revision – Item #8”) in our application, that the Crist Landfill Stormwater Collection Pond RICE (Portable Diesel Pump – Rental) should be added to Appendix U of the permit as a non-road unregulated emission unit. This request was pursuant to pre-application discussions with the Department on November 7, 2012.

FDEP Question #1a. Landfill Stormwater Collection Pond. How many gallons of diesel fuel are fired in this unit annually?

Gulf Response: Specific fuel usages on individual RICE units are not currently required. Historically, Plant Crist monitors total fuel usage of the RICE units for AOR reporting. The Landfill Stormwater Collection Pond RICE is a hurricane seasonal rental unit specifically used as a backup system in case the primary electrical power is loss due to a storm or other circumstances. This unit operates minimum hours per season and usage is estimate at less than 100 hours per year.

FDEP Question #1b. Coal Yard Sump Pump Nos. 1, 2, 3, 4/5 and 7. Do these units remain in one location in “ready to operate condition” for more than 12 months at a time? If so, do these units meet EPA’s requirements for an emergency engine (i.e. operating less than 100 hours per year in non-emergency situations)? Also, please provide the date of manufacture, the model year and date of commencement of construction for each of these engines.

Gulf Response: Coal Yard Sump Pump Nos. 1,2,3,4/5 and 7 generally remain in one location for more than 12 months at a time and are not considered mobile. Gulf believes these engines are subject to 40 CFR, Subpart 60 IIII and 40 CFR, Subpart 63 ZZZZ as outlined in our Regulatory Analysis provided with the application referenced above.

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FDEP Question #1c. Emergency Generator for Office Annex (Portable). Does this unit remain in one location in “ready to operate condition” for more than 12 months at a time? If so, does this unit meet EPA’s requirements for an emergency engine (i.e. operating less than 100 hours per year in non-emergency situations)? Also, please provide the date of manufacture, the model year and date of commencement of construction for this engine.

Gulf Response: The Crist Emergency Generator for Office Annex (Portable) remains generally in one location in “ready to operate condition” for more than 12 months at a time. Gulf believes this engine is subject to 40 CFR, Subpart 60 IIII and 40 CFR, Subpart 63 ZZZZ as outlined in our the Regulatory Analysis provided with the application referenced above.

FDEP Question #1d. Emergency Generator at Turbine Floor. Please provide the date of manufacture, the model year and date of commencement of construction for this engine.

Gulf Response: Gulf believes this engine is subject to 40 CFR, Subpart 60 IIII and 40 CFR, Subpart 63 ZZZZ as outlined in our the Regulatory Analysis provided with the application referenced above.

FDEP Question #1e. 5 Welding Machines. Do these units remain in one location in “ready to operate condition” for more than 12 months at a time? If so, please provide a detailed applicability determination for these non-emergency engines for 40 CFR 60, Subpart IIII and 40 CFR 63, Subpart ZZZZ.

Gulf Response: Gulf believes the Regulatory Analysis provided with the application referenced in our General Comments above is accurate and correctly identifies 3 of the 5 units as non-emergency engines subject to 40 CFR 60, Subpart IIII and all 5 units as non-emergency engines subject to 40 CFR 63, Subpart ZZZZ.

FDEP Question #2. Gulf Power has requested to delete the coal blend sulfur specification of 3.3 pounds of sulfur dioxide per million Btu from condition No. 1 of permit No 0330045-029-AC. Based on a review of past permitting actions and alternate sampling procedures, it is the Department’s opinion that if the 3.3 lb/MMBtu limit is removed, the remaining sulfur dioxide limit for units 4 – 7 is 2.4 lb/MMBtu on a 24-hour average to be protective of the ambient air quality standards for sulfur dioxide. While the scrubber is operating, there is an additional limit of 886 tons of SO₂ during any 30-day period, as determined by the SO₂ CEMS in the scrubber stack. When the scrubber is not in operation, compliance with the 2.4 lb/MMBtu (24-hour) limit is assured by not exceeding 25,840 lbs/hour on a 3-hour block average, as determined by either the SO₂ CEMS in the bypass stack or by fuel sampling and analysis. Does Gulf Power agree with this interpretation of the remaining enforceable limitations for SO₂? If the fuel sulfur specification is removed, please explain how Gulf

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Power will provide reasonable assurance that the 2.4 lb/MMBtu standard is not exceeded during times of SO₂ CEMS downtime.

Gulf Response: Gulf Power generally agrees with the statement. Gulf believes the 3.30 SO₂ lb/mmbtu limit outlined in the Air Construction Permit 033045-029-AC is unnecessary and restricts the flexibility of the plant. The condition requires a rate based measurement at the inlet of the scrubber on a continuous basis which is not reflective of compliance to the 886 SO₂ ton mass based standard (equivalent to 0.20 lb/mmbtu) at the outlet of the scrubber on a 30 day average. The Crist scrubber does not have a percent SO₂ reduction requirement; therefore there is no driver for an inlet SO₂ limit. The scrubber outlet SO₂ CEM system provides reasonable assurance of compliance to a 2.4 lb/mmbtu emissions standard. In addition, the Crist scrubber bypass outlet SO₂ CEM systems provide similar reasonable assurance to the standard by not exceeding the volunteered 25,840 SO₂ lb/hr mass limit (equivalent to 2.1 SO₂ lb/mmbtu) based on a 3-hour block. The Crist CEM SO₂ monitoring systems are subject to the Acid Rain Part 75 provisions which require greater than 95% availability of the systems. The Crist SO₂ monitoring system typically achieves availability at greater than 99% annually; thus there is very little actual CEM downtime of concern and compliance during these periods can be accounted through EPA alternative data routines under the Acid Rain and CAIR programs. In addition, Crist has unit by unit daily fuel information which can be used to calculate compliance to the mass emissions stack limits should the agency have specific concerns.