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DIVISION OF AIR
RESOURCE MANAGEMENT



A SOUTHERN COMPANY

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March 26, 2013

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:

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 January 16, 2013, 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,

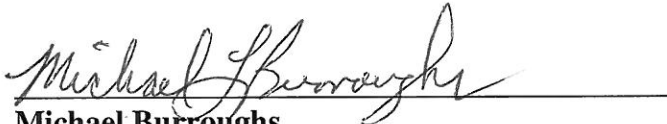
G. Dwain Waters, Q.E.P.
Special Projects and Environmental Assets Coordinator

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
Susan Kennedy, Gulf Power Company
Gary Perko, Hopping, Green & Sams


**GULF POWER RESPONSE TO FDEP'S REQUEST FOR
ADDITIONAL INFORMATION DATED JANUARY 16, 2013
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:



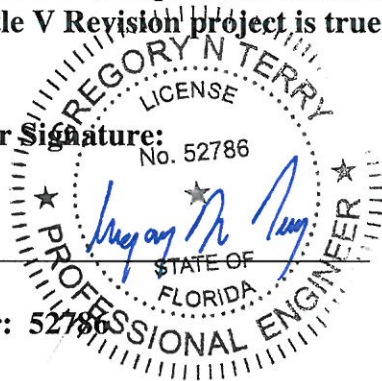
Michael Burroughs
Vice-President, Power Generation and SPO


Date:

**GULF POWER RESPONSE TO FDEP'S REQUEST FOR
ADDITIONAL INFORMATION DATED JANUARY 16, 2013
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 Signature:



Gregory N. Terry

Registration Number: 52786

3-22-2013

Date

Gulf Response to Request for Additional Information (RAI)
Facility ID No: 0330045-036-AC & 0330045-037-AV
March 26, 2013

Background: On January 16, 2013, Gulf received the following questions from FDEP:

FDEP Question #1. Landfill Stormwater Collection Pond. This unit is exempt from the RICE rules due to its size and age and will be added to the list of unregulated activities within the Title V permit contained in Appendix U.

Gulf Response: Gulf agrees. (Item #1 in Crist RICE Master List).

FDEP Question #2. Based on the information provided, the following engines were purchased within the time period where they could be subject to either NESHAPS, Subpart ZZZZ or NSPS, Subpart IIII.

- Coal Yard Sump Pump Nos 1,2,3,4/5 and 7
- Emergency Generator for Office Annex
- Emergency Generator for Turbine Floor

Gulf Response: Upon further review of the engines, Gulf has determined the following:

- Coal Yard Sump Pumps Nos 1,2,3, and Building Sump Pumps Nos. 4/5 and 7 (Items 2-6 in Crist RICE Master List) are all emergency engines (NESHAPS, Subpart ZZZZ that must meet NSPS, Subpart IIII limits) and each were ordered and manufactured after June 12, 2006 and meet EPA's applicable standard. See attached Plant Crist RICE Applicable Standards Table, EPA 40 CFR 60 Subpart IIII Table 1, and the Plant Crist Manufacturer's Certification Information.
- Emergency Generator for Office Annex (Item 12 in Crist RICE Master List) is a portable (movable) emergency generator (NESHAPS, Subpart ZZZZ, that must meet NSPS, Subpart IIII limits), <500 hp and manufactured after June 12, 2006 to meet EPA's applicable standard. This unit should be added to the list of insignificant activities in the Title V permit contained in Appendix I with no unit specific requirements.
- Emergency Generator for Turbine Floor (Item 13 in Crist RICE Master List) is an emergency generator (NESHAPS, Subpart ZZZZ) >500 hp and was ordered and manufactured after June 12, 2006 to meet EPA's applicable standard. See attached Plant Crist RICE Applicable Standards Table, EPA 40 CFR 60 Subpart IIII Table 1, and the Plant Crist Manufacturer's Certification Information.

FDEP Question #3. 5 Welding Machines. Please clarify which of these welding units are permanently mounted and installed in the shop areas (stationary sources) and which, if any, are movable for operation throughout the plant (these would qualify as non-road engines and could be placed into Appendix I or Appendix U, as appropriate). For the ones that are stationary units, please provide the "date of manufacture", the "model year", and the date of "commencement of construction" for each of these engines. Please identify which, if any, of these engines are certified by the manufacturer and what emissions standards they are certified to meet.

Gulf Response: Upon further review of the engines, Gulf has determined that all 5 Crist welding machines are portable (movable) and are used throughout the plant and qualify as non-road engines and should be included in Appendix I as insignificant activities with no unit specific requirements.

Plant Crist RICE Applicable Standards Table

Unit Description	Applicable Rule	NOx Standard (Manufacturer's NOx Certification)	HC Standard (Manufacturer's HC Certification)	CO Standard (Manufacturer's CO Certification)	PM Standard (Manufacturer's PM Certification)
Coal Yard Sump No. 1,2,3 & Building Sump Pumps Nos. 4/5 (Items #2-5 Crist Master List) (46 hp @ 1800 rpm)	Section: 60.4205(a) Subpart III <10 L/Cylinder Table 1 (25-50 Hp)	9.5 g/kW-hr Includes HC (6.38 g/kW-hr)*	NA	5.5 g/kW-hr (2.65 g/kW-hr)*	0.80 g/kW-hr (.211 g/kW-hr)*
Building Sump Pump No. 7 (Item #6 Crist Master List) (139 hp @ 2000 rpm)	Section: 60.4205(a) Subpart III <10 L/Cylinder Table 1 (100-175 Hp)	9.2 g/kW-hr (6.3 g/kW-hr)*	NA	NA	NA
Turbine Floor Emergency Generator (Item #14 Crist Master List) (898 hp @ 1800 rpm)	Section: 60.4205(a) Subpart III < 10L/Cylinder Table 1 (Hp>750)	9.2 g/kW-hr (8.504 g/kW-hr)*	1.3 g/kW-hr (.631 g/kW-hr)	11.4 g/kW-hr (.692 g/kW-hr)*	0.54 g/kW-hr (.215 g/kW-hr)*

* See attached Manufacturer's Emissions Certification

TABLE 1 TO SUBPART III OF PART 60—EMISSION STANDARDS FOR STATIONARY PRE-2007 MODEL YEAR ENGINES WITH A DISPLACEMENT OF <10 LITERS PER CYLINDER AND 2007-2010 MODEL YEAR ENGINES >2,237 KW (3,000 HP) AND WITH A DISPLACEMENT OF <10 LITERS PER CYLINDER

[As stated in §§ 60.4201(b), 60.4202(b), 60.4204(a), and 60.4205(a), you must comply with the following emission standards]

Maximum engine power	Emission standards for stationary pre-2007 model year engines with a displacement of <10 liters per cylinder and 2007-2010 model year engines >2,237 KW (3,000 HP) and with a displacement of <10 liters per cylinder in g/KW-hr (g/HP-hr)					
	NMHC + NOX	HC	NOX	CO	PM	
KW<8 (HP<11)	10.5 (7.8)			8.0 (6.0)	1.0 (0.75)	
8≤KW<19 (11≤HP<25)	9.5 (7.1)			6.6 (4.9)	0.80 (0.60)	
19≤KW<37 (25≤HP<50)	9.5 (7.1)			5.5 (4.1)	0.80 (0.60)	
37≤KW<56 (50≤HP<75)			9.2 (6.9)			
56≤KW<75 (75≤HP<100)			9.2 (6.9)			
75≤KW<130 (100≤HP<175)			9.2 (6.9)			
130≤KW<225 (175≤HP<300)		1.3 (1.0)	9.2 (6.9)	11.4 (8.5)	0.54 (0.40)	
225≤KW<450 (300≤HP<600)		1.3 (1.0)	9.2 (6.9)	11.4 (8.5)	0.54 (0.40)	
450≤KW≤560 (600≤HP≤750)		1.3 (1.0)	9.2 (6.9)	11.4 (8.5)	0.54 (0.40)	
KW>560 (HP>750)		1.3 (1.0)	9.2 (6.9)	11.4 (8.5)	0.54 (0.40)	

For questions or comments regarding e-CFR editorial content, features, or design, email ecfr@nara.gov.
 For questions concerning e-CFR programming and delivery issues, email webteam@gpo.gov.

Plant Crist - Manufacturer's Certification Information

Coal Yard Sump Pump No. 1

Coal Yard Sump Pump No. 2

Coal Yard Sump Pump No. 3

No. 4/5 Building Sump Pump

Manufacturer	Engine Family	Process Code	Certificate #	Category	Eng. Cycle	Displacement	Fuel Type	Fuel System Type	Method of Aspiration
Deutz AG	6DZXL03.1041	New Submission	DZX-NR3-06-01	Nonroad CI	Diesel	1,555,2,332,3,109 LITERS	Diesel	Mechanical Direct Injection	Naturally

Manufacturer	Engine Family	Category	Units	OMHCE	OMHCE	Nox	CO	Nox	PM
Deutz AG	6DZXL03.1041	Nonroad CI	g/kW-hr			6.38	2.65		0.211

Engine Family	Engine Code	Engine Model	BHP @ RPM	44.5	17.7	Fuel Rate		Emission control Device	
						MM/stroke@peak # (for diesel only)	MM/stroke@peak # (lbs/hr@peak HP)		
6DZXL03.1041	DE34.5	F4L2011	46.6@1800			n.a.@n.a.	0	0	DDI, EM

Unit 7 Building Sump Pump

Manufacturer	Engine Family	Category	Units	OMHCE	OMHCE	Nox	CO	Nox	PM
John Deere Power	6JDXL06.8041	Nonroad CI	g/kW-hr			6.3	1.1		0.24

Emergency Generator (Turbine Floor)

Manufacturer	Engine Family	Process Code	Certificate #	Category	Eng. Cycle	Displacement	Fuel Type	Fuel System Type	Method of Aspiration
Mitsubishi Heavy Ind	5MVXL24.5ABB	New Submission	MVX-NR9-05-01	Nonroad CI	Diesel	24.51 Liters	Diesel	Mechanical Direct Injection	Turbo Air to Water (TAW)

Manufacturer	Engine Family	Category	Units	OMHCE	OMHCE	Nox	CO	Nox	PM
Mitsubishi Heavy Ind	5MVXL24.5ABB	Nonroad CI	g/kW-hr	0.631			0.692	8.504	0.215