From: Cascio, Tom
To: "Baez, David R."
Subject: RE: Stanton Title V Permit
Date: Wednesday, August 27, 2014 11:38:00 AM

Hi David – thanks for the fast response. We can fix these things in the final permit. No revised draft needed.

Tom

From: Baez, David R. [mailto:DBaez@ouc.com]
Sent: Wednesday, August 27, 2014 11:03 AM
To: Cascio, Tom
Subject: Fwd: Stanton Title V Permit

Tom,

These are the comments we have from Southern Company.

The first one, I thought I would only mention and merely require an administrative correction.

The second one actually changes the standard that the RICE is subject to. Would that still be an admin fix, or would this require a re-issue of the draft?

Thank you
David

Sent from my iPhone

Begin forwarded message:

> **From:** "Kennedy, Susan Butler" <SKENNEDY@southernco.com>
> **Date:** August 27, 2014 at 10:55:37 AM EDT
> **To:** "Baez, David R." <DBaez@ouc.com>
> **Cc:** "Lightsey, Trey (SPC)" <JLIGHTSE@southernco.com>, "Young, Rebecca G. (SPC)" <RGIVY@southernco.com>, "Terry, Greg N." <GNTERRY@southernco.com>
> **Subject: Stanton Title V Permit**
>
> Good Morning David,
> Per our conversation, I am following up with an email regarding comments from Southern Power on the Stanton Title V draft/proposed permit.
> We have 2 items to address:
>
> 1. On Page 5 of 8 of the Technical Evaluation and Preliminary Determination, Stanton is incorrectly referenced as "Suwannee Plant" in the first and second full paragraphs. We would recommend changing these references.
>
> This category applies to the ~~Suwanee~~ Stanton Plant before and after the proposed project. The ~~Suwanee~~ Stanton Plant is a major stationary source based on actual emissions of and potential to emit 100 TPY or more of several individual PSD pollutants.
> For major stationary sources such as the ~~Suwanee~~ Stanton Plant, PSD applicability for modification projects is based on thresholds known as the significant emission rates (SER) as defined in Rule 62-210.200(274), F.A.C.

2. On Page 49 and 50 of 80 in the Draft/Proposed Permit, the Emission Unit Description for 041 is incorrect and therefore the Emission Standards referenced are also incorrect and need to be changed. EU041 is listed as "500 kw" Engine and should be listed as a "563 kW" Engine. The emission standards listed in J.4, J.5 and J.6 should be Tier 2, 2006 standards which are 6.4 g/kW-hr for NMHC + NOx; 3.5 g/kW-hr for CO; and 0.20 g/kW-hr for PM. Please see the edits below:

Page 49 of 80

ID No.	Emission Unit Description
041	One ~~500~~ 563 kW Diesel Engine-driven Emergency Engine

Engine Identification	Engine Brake HP	Date of Manufacture	Model Year	Displacement liters/cylinder (l/c)	Engine Manufacturer	Model No.
Emergency Diesel Engine	~~670.51~~ 760	2009	~~2009~~ 2008	14.9 l total 2.29 l/c	~~Unknown~~ Cummings	Unknown

Page 50 or 80

Emissions Standards

J.4. NOX + NMHC Emissions. Emissions of NOX plus non-methane hydrocarbons shall not exceed ~~4.0~~ 6.4 grams per kilowatt hour (g/kW-hr). [40 CFR 60.4205(b), 40 CFR 60.4202(a)(2) & 40 CFR 89.112]

J.5. CO Emissions. Carbon monoxide (CO) emissions shall not exceed 3.5 g/kW-hr. [40 CFR 60.4205(b), 40 CFR 60.4202(a)(2) & 40 CFR 89.112]

J.6. PM Emissions. Particulate matter (PM) emissions shall not exceed 0.20 g/kW-hr. [40 CFR 60.4205(b), 40 CFR 60.4202(a)(2) & 40 CFR 89.112]

Please feel free to call or email with any questions or comments,
Thanks so much,
Susan.

Susan B. Kennedy, QEP
Sr. Environmental Affairs Specialist
Gulf Power Company
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