Tel 850.444.6111





Certified Mail

March 3, 2005

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

Dear Ms. Veazey:

RE: PEA RIDGE CO-GENERATION FACILITY
RESPONSIBLE OFFICIAL REQUEST CHANGE

PERMIT No: 1130173-008-AV

Attached, please find a revised "Responsible Official Notification Form" for Gulf Power's Pea Ridge Co-generation Facility. This request is pursuant to a personnel change within Gulf Power for the Vice-President, Power Generation from Gene L. Ussery, Jr. to Penny M. Manuel.

If you have any questions or need further information regarding this change of Responsible Official for the Pea Ridge Co-generation Facility, please call me at (850) 444-6527.

Sincerely,

G. Dwain Waters, OEP

Air Quality Programs Supervisor

cc: w/att:

Jim Vick, Gulf Power Company

Bernard Jacob, Gulf Power Company

Lisa Ann Cich, Air Products and Chemicals, Inc.

Gary Perko, HGS

Brian Toth, Southern Company Services



### RECEIVED **Department of Environmental Protection**

MAR 1 4 2005

## Division of Air Resource Management BUREAU OF AIR REGULATION RESPONSIBLE OFFICIAL NOTIFICATION FORM

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

<ol> <li>Facility Owner/Company Name: Gulf Power Company</li> <li>Site Name: Pea Ridge Co-generation</li> <li>County: Santa Rosa</li> </ol>				
	l.			
Facility				
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): 1130173-008-AV	·			
Notification Type (Check one or more)				
[ ] INITIAL: Notification of responsible officials for an initial Title V application.				
[ ] RENEWAL: Notification of responsible officials for a renewal Title V application.				
[X] CHANGE: Notification of change in responsible official(s).				
Effective date of change in responsible official(s) 03/01/05	4			
Primary Responsible Official				
1. Name and Position Title of Responsible Official: Penny M. Manuel (pmmanuel@sout	thernco.com)			
2. Responsible Official Mailing Address: Organization/Firm: Gulf Power Company Street Address: One Energy Place				
City: Pensacola State: Florida Zip Code: 32520-0100	:			
3. Responsible Official Telephone Numbers:				
Telephone: (850) 444-6383 Fax: (850) 444-6744				
4. Responsible Official Qualification (Check one or more of the following options, as app	plicable):			
[X] For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.				
<ul> <li>[ ] For a partnership or sole proprietorship, a general partner or the proprietor, respectively.</li> <li>[ ] For a municipality, county, state, federal, or other public agency, either a principal executive official.</li> <li>[ ] The designated representative at an Acid Pain source.</li> </ul>	cer or ranking			
<ul><li>[ ] The designated representative at an Acid Rain source.</li><li>5. Responsible Official Statement:</li></ul>				
I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title addressed in this notification. I hereby certify, based on information and belief formed after recinquiry, that the statements made in this notification are true, accurate and complete. Further,	asonable			

1

DEP Form No. 62-213.900(8)

Effective: 6-02-02

# (FOR INTERNAL USE ONLY) State of Florida summary checklist for Title V permit applications (cont'd)

[]	II. Initial distribution of application.
_a	Disposition of 4 paper/electronic copies submitted:  1- Clean originals to file? YN
	1- NW District Y N
	1 County [affected local program]? Y N
	1- Permit engineer(s) Jouth Hito,
b,	Disposition of electronic files submitted:
	copy placed onto PC? Y N
G.	Disposition of ELSA submitted:
	version used [circle]: 1.0 1.1 1.2.1 1.3 1.3a 1.3b
	Uploaded to EARS? Y N
	by date//
.3	61-4-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1
9	Électronic information submitted previewed? YNN/A
Ċ	omment(s):
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# (FOR INTERNAL USE ONLY) State of Florida summary checklist for Title V permit applications

Facility Owner/Operator Name: Orl Power Company Facility ID No.: 0 0 5 0 0 1 4 Site Name: Smith F	27 .
County 10 No.: 0 0 3 0 0 1 4 Site Name: 3mi4L P	74.+
application receipt date 08/01/03	
application receipt date Ot 100 125	
<ul><li>I. Preliminary scanning of application submitted.</li><li>a. Was application submitted to correct permitting authority?</li></ul>	Y V N
b. Was an application filed?	Y* / N
c. Was the application filed timely?	Y
d. Application format filed [check one].	
Hard copy of official version of form? ELSA?	
A facsimile of official version of form? Some comb	ination?
e. 4 copies (paper/electronic) submitted? I copy  f. Electronic diskettes protected/virus scanned/marked? Y	N N/A
	date//
g. Entire hard copy of Section I. provided (Pages 1-11 of form)?  Facility identified (Page 1)? [if not complete a Page 1]  R.O. certification signed and dated (Page 2)?  P.E. certification signed and dated (Page 7)?	Y V N
R O certification signed and dated (Page 2)?	V* ✓ N
P.E. certification signed and dated (Page 7)?	Y*
1.D. common signed and dated (1 ago 1).	<u> </u>
h. Any confidential information submitted?	Y N \( \sum_{Y*} \) \( N \) \( Y* \) \( N
If yes, R.O. provided hard copy to us and EPA?	Y* N
If yes, hard copy locked up and note filed with application?	Y* N
i. Type of application filed. Revision	
TV renewal application only?	Y N
Initial TV application only?	Y N
All units demonstrated initial compliance?	Y N Y N Y N
If, not included compliance plan?	Y N
Any units subject to acid rain?	YVN
· CANCEL 1 // 10	
j. CAM Plan submitted?	Y N
Note(s): $[*]$ = mandatory.	
Comment(s):	•
Reviewer's initials 6 date 6 / 10 / 03 Concurrence	initials date//

Tel 850,444,6111



Certified Mail

July 21, 2003

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

RECEIVED

AUG 01 2003

BUREAU OF AIR REGULATION

Dear Mr.Sheplak:

RE: Lansing Smith Electric Generating Plant - Title V Revision

Permit Number: 0050014

Phase II Nox Averaging Plan Revision

The Southern Company recently revised the Acid Rain Phase II NOx Averaging Plan due to the retirement of several generating units in Georgia. This plan was originally implemented in 1999 at Gulf Power for Plants Crist, Lansing Smith and Scholz. The new plan will be effective for years 2003 through 2007. Please find attached a revised Phase II NOx Averaging Plan and subsequent request to revise the Lansing Smith Title V permit.

Please let me know if you have any questions regarding our application for revision to the Lansing Smith Title V permit.

Sincerely,

G. Dwain Waters, Q.E.P.

Air Quality Programs Supervisor

cc:w/o attachment:

J. O. Vick, <u>Gulf Power Company</u>
Trey Hall, <u>Gulf Power Company</u>
Marie Largilliere, <u>Gulf Power Company</u>
Danny Herrin, <u>Southern Company Services</u>
Gary Perko, <u>Hopping</u>, <u>Green & Smith</u>

Sandra Veazey, FDEP- NWF District



# Department of Environmental Protection Division of Air Resource Management AUG 01 2003 CATION FOR AIR PERMIT - LONG FORM OF AIR REGULATION MATION AND OF AIR REGULATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

**Air Operation Permit** – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option) - Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit

incorporating the proposed project.

To ensure accuracy, please see form instructions.

### **Identification of Facility**

1.	Facility Owner/Company Name: Gulf Power Company					
2.	Site Name: Lansing Smith Electric Generating Plant					
3.	Facility Identification Number: 0050014					
4.	Facility Location: Street Address or Other Locator: 4300 County Road 2300					
	City: Southport County: Bay Zip Code: 32409					
5.	. Relocatable Facility?  ☐ Yes ☐ No  6. Existing Title V Permitted Facility? ☐ Yes ☐ No					
Ap	plication Contact					
1.	Application Contact Name: G. Dwain Waters					
2.	Application Contact Mailing Address Organization/Firm: Gulf Power Company					
	Street Address: One Energy Place					
	City: Pensacola State: Florida Zip Code: 32520-0328					
3.	Application Contact Telephone Numbers					
	Telephone: (850) 444-6527 ext. Fax: (850) 444-6217					
4.	4. Application Contact Email Address: gdwaters@southernco.com					
<u>A</u> p	Application Processing Information (DEP Use)					
1.	Date of Receipt of Application:					
2.	Project Number(s):					
3.	PSD Number (if applicable):					

DEP Form No. 62-210.900(1) - Form

Effective: 06/16/03

ng Number (if applicable):	
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DEP Form No. 62-210.900(1) - Form Effective: 06/16/03

### **Purpose of Application**

X MI POSE OF TAPPHEMENON				
This application for air permit is submitted to obtain: (Check one)				
Air Construction Permit  ☐ Air construction permit.				
Air Operation Permit  ☐ Initial Title V air operation permit.  ☐ Title V air operation permit revision.  ☐ Title V air operation permit renewal.  ☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.  ☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.				
Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)  Air construction permit and Title V permit revision, incorporating the proposed project.  Air construction permit and Title V permit renewal, incorporating the proposed project.				
Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:				
☐ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.				
Application Comment				
The purpose of this application is to update the Title IV Acid Rain Permit to incorporate a revised NOx Averaging Plan. The revision is due to the retirement of several generating units within the Southern Company system. These units have been deleted from the Phase II NOx				

The purpose of this application is to update the Title IV Acid Rain Permit to incorporate a revised NOx Averaging Plan. The revision is due to the retirement of several generating units within the Southern Company system. These units have been deleted from the Phase II NOx Averaging Plan. See the Phase II NOx Average Plan for details.

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DEP Form No. 62-210.900(1) - Form

Effective: 06/16/03

### **Scope of Application**

Emissions		Air	Air
Unit ID	Description of Emissions Unit	Permit	Permit
	Description of Emissions Unit		
Number		Type	Proc. Fee
001	Boiler Number 1- 1944.8 MMBtu/hr	1	
002	Boiler Number 2 - 2246.2 MMBtu/hr	2	
003	003 Combustion Turbine - 542 MMBtu/hr		
004	170 MW Gas Combustion Turbine & HRSG & Duct Burner	4	
005	170 MW Gas Combustion Turbine & HRSG & Duct Burner	5	
006	Cooling Tower	6	
007	Material Handling of Coal andAsh	7	
008	Fugitive PM Sources	8	
009	General Purpose Internal Combustion	9	

Application Processing Fee	
Check one: Attached - Amount \$	Not Applicable

DEP Form No. 62-210.900(1) - Form

Effective: 06/16/03 4

### Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1.	Owner/Authorized Representative	ve Name :					
2.	Owner/Authorized Representativ Organization/Firm:	ve Mailing Addres	SS				
	Street Address:						
	City:	State:			Zip C	ode:	
3.	Owner/Authorized Representative	ve Telephone Nun	nbers				
	Telephone: ( ) -	ext.	Fax:	(	)	-	
1.	Owner/Authorized Representative	ve Email Address:					
5.	Owner/Authorized Representative	ve Statement:					
	-						
	Signature			Date			

DEP Form No. 62-210.900(1) - Form Effective: 06/16/03

### **Application Responsible Official Certification**

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1.	Application Responsible Official Name: Gene L. Ussery, Jr.				
2.	Application Responsible Official Qualification (Check one or more of the following options, as applicable):				
	For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.				
	<ul> <li>For a partnership or sole proprietorship, a general partner or the proprietor, respectively.</li> <li>For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.</li> </ul>				
	☐ The designated representative at an Acid Rain source.				
3.	Application Responsible Official Mailing Address Organization/Firm: Gulf Power Company				
	Street Address: One Energy Place				
	City: Pensacola State: Fl Zip Code: 32520-0100				
4.	Application Responsible Official Telephone Numbers Telephone: (850) 444-6383 ext. Fax: (850) 444-6744				
5.	Application Responsible Official Email Address: GLUSSERY@southernco.com				
6.	Application Responsible Official Certification:				
	I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.				
	- Jun - 1-21.03				
	Signature Date				

DEP Form No. 62-210.900(1) - Form Effective: 06/16/03

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<u>Pr</u>	Professional Engineer Certification				
1.	Professional Engineer Name: Gregory N. Terry				
	Registration Number: 52786				
2.	Professional Engineer Mailing Address Organization/Firm: Gulf Power Company				
	Street Address: One Energy Place				
	City: Pensacola State: Fl Zip Code: 32520-0340				
3.	Professional Engineer Telephone Numbers				
	Telephone: (850) 429-2381 ext. Fax: (850) 429-2246				
4.	Professional Engineer Email Address: GNTERRY@southernco.com				
5.	Professional Engineer Statement:				
	I, the undersigned, hereby certify, except as particularly noted herein*, that:				
	(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and				
	(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.				
	(3) If the purpose of this application is to obtain a Title $V$ air operation permit (check here $\boxtimes$ , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.				
	(4) If the purpose of this application is to obtain an air construction permit (check here $\square$ , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here $\square$ , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.				
, ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here, if so,). I further certify that, with the exception of any changes detailed as part of this application, each sucferissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.  T-17-2003  Signature 0.1				
·7	Alone Alone				

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(seal). (seal)

DEP Form No. 62-210.900(1) - Form

Effective: 06/16/03

## Florida Department of Environmental Protection

# Phase II NO<sub>x</sub> Averaging Plan

For more information, see instructions for DEP Form No. 62-210.900(1)(a)4.and refer to 40 CFR 76.11

This submission is:

New

X Revised

### STEP 1

Identify the units participating in this averaging plan by plant name, state, and boiler ID# from NADB. In column (a), fill in each unit's applicable emission limitation from 40 CFR 76.5, 76.6, or 76.7. In column (b), assign an alternative contemporaneous annual emissions limitation in lb/mmBtu to each unit. In column (c), assign an annual heat input limitation in mmBtu to each unit. Continue to page 3 if necessary.

	<u> </u>		(a)	(b)	(c)
Plant Name	State	ID#	Emission Limitation	Alt. Contemp. Emission Limitation	Annual Heat Input Limit
See Page 3					
	_				
					'

### STEP 2

Use the formula to enter the Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan and the Btu-weighted annual average emission rate for the same units if they are operated in compliance with 40 CFR 76.5, 76.6, or 76.7. The former must be less than or equal to the latter.

Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan

Btu-weighted annual average emission rate for same units operated in compliance with 40 CFR 76.5, 76.6 or 76.7

$$\frac{\sum_{i=1}^{n} (R_{Li} x HI_i)}{\sum_{i=1}^{n} HI_i}$$

$$\frac{\sum_{i=1}^{n} \left[ R_{li} \times HI_{i} \right]}{\sum_{i=1}^{n} HI_{i}}$$

W here,

R<sub>Li</sub>

 $R_{li}$ 

Alternative contemporaneous annual emmision limitation for unit i, in

16/mmBtu, as specified in column (b) of Step 1;
= Applicable emission limitation for unit i, in lb/mmBtu, as specified in

column (a) of Step 1:

HI<sub>i</sub> = Annual heat input for unit i, in mmBtu, as specified in column (c) of

Step 1:

n =

Number of units in the averaging plan

	Southern Company Averaging Plan Participating
	Plants Plant Name (from Step 1)
	This plan is effective for calendar year through calendar year
STEP 3	unless notification to terminate the plan is given.
Mark one of the two options and enter dates.	X Treat this plan as $5$ identical plans, each effective for one calendar year for the following calendar years: $2003$ , $2004$ , $2005$ , $2006$ and $2007$ unless notification to terminate one or more of these plans is given.
STEP 4	Special Provisions
Read the special	Emission Limitations
provisions and certification, enter the name of the designated representative, and sign and date.	Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitation for NO <sub>x</sub> under the plan only if the following requirements are met:
	<ul> <li>(i) For each unit, the unit's actual annual average emission rate for the calendar year, in Ib/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and</li> <li>(a) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,</li> <li>(b) For each unit with an alternative contemporaneous emission limitation more stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, or</li> <li>(ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with 40 CFR 76.11(d)(1)(ii)(A) and (B), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7.</li> <li>(iii) If there is a successful group showing of compliance under 40 CFR 76.11(d)(1)(ii)(A) and (B) for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under (i).</li> <li>Liability</li> <li>The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability</li> </ul>
	for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.
	Termination
	The designated representative may submit a notification to terminate an approved averaging plan, in accordance with 40 CFR 72.40(d), no later than October 1 of the calendar year for which the plan is to be terminated.
	Certification
	I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.
Name W. Faul Rowers	
Signature	Date 11 5 0 0 2

DEP Form No. 62-210.900(1)(a)5. - Form Effective: 1/6/98

### Southern Company Averaging Plan Participating Plants Plant Name (from Step 1)

as Listed in Step 1.

(a)

NO<sub>x</sub> Averaging - Page 3

(c)

(b)

STEP 1 Continue the identification of units from Step 1, page 1, here.

Plant Name	State	ID#	Emission Limitation	Alt. Contemp. Emission Limitation	Annual Heat Input Limit
Barry	AL	1	0.40	0.57	9,899,353
Barry	AL	2	0.40	0.57	8,827,877
Barry	AL	3	0.40	0.57	16,115,170
Barry	AL	4	0.40	0.45	26,192,590
Barry	AL	5	0.40	0.45	51,553,955
Bowen	GA	1	0.45	0.42	45,308,998
Bowen	GA	2	0.45	0.43	44,124,507
Bowen	GA_	3	0.45	0.43	59,801,873
Bowen	GA	4	0.45	0.43	60,182,168
Branch	GA	1	0.68	0.99	13,188,369
Branch	GA	2	0.50	0.72	18,342,165
Branch	GA	3	0.68	0.84	26,905,201
Branch	GA	4	0.68	0.84	30,127,590
Crist	FL	4	0.45	0.52	5,591,320
Crist	FL	5	0.45	0.60	5,479,586
Crist	FL	6	0.50	0.45	21,086,630
Crist	FL	7	0.50	0.45	34,569,955
Daniel	MS	1	0.45	0.28	30,626,415
Daniel	MS	2	0.45	0.26	40,588,498
Gadsden	AL	1	0.45	0.70	2,711,382
Gadsden	ÁL	2	0.45	0.70	3,120,871
Gaston	AL	1	0.50	0.52	18,858,472
Gaston	AL	2	0.50	0.52	16,624,702
Gaston	AL	3	0.50	0.52	18,430,084
Gaston	AL	4	0.50	0.52	18,740,418
Gaston	AL	5	0.45	0.48	47,511,274
Gorgas	AL	6	0.46	0.55	4,410,470
Gorgas	AL	7	0.46	0.55	4,567,585
Gorgas	AL	8	0.40	0.50	9,965,627
Gorgas	AL	9	0.40	0.50	9,120,885
Gorgas	AL	10	0.40	0.35	45,358,619

# Southern Company Averaging Plan Participating Plants as Listed in Step 1.

Plant Name (from Step 1)

### NO<sub>x</sub> Averaging - Page 4

(a)

(b)

(c)

			1-7	(2)	19
Plant Name	State	ID#	Emission Limitation	Alt. Contemp. Emission Limitation	Annual Heat Input Limit
Greene Co	AL	1	0.68	0.82	17,363,013
Greene Co	AL	2	0.46	0.50	19,145,604
Hammond	GA	1	0.50	0.83	6,007,234
Hammond	GA .	2	0.50	0.83	5,605,352
Hammond	GA	3	0.50	0.83	6,386,989
Hammond	GA_	4	0.50	0.45	26,721,145
Kraft	GA	1	0.45	0.58	3,578,077
Kraft	GA	2	0.45	0.58	3,745,253
Kraft	GA	3	0.45	0.58	7,231,649
L. Smith	FL	1	0.40	0.62	11,275,531
L. Smith	FL	2	0.40	0.44	9,250,882
McDonough	GA	1	0.45	0.42	18,180,480
McDonough	GA	2	0.45	0.42	17,346,682
McIntosh	GA	1	0.50	0.86	11,087,042
Miller	AL	1	0.46	0.37	47,413,738
Miller	AL .	2	0.46	0.37	52,747,691
Miller	AL	3	0.46	0.28	44,422,395
Miller	AL	4	0.46	0.28	47,115,364
Mitchell	GA	3	0.45	0.62	6,652,246
Scherer	GA	1	0.40	0.50	4,139,139
Scherer	GA	2	0.40	0.50	4,365,628
Scherer	GA	3	0.45	0.39	53,365,333
Scherer	GA	4	0.40	0.39	70,093,731
Scholz	Ή	1.	0.50	0.68	2,365,039
Scholz	FL	2	0.50	0.77	2,429,511
Wansley	GA	1	0.45	0.41	30,043,256
Wansley	GA	2	0.45	0.42	29,235,561
Watson	MS	4	0.50	0.50	16,243,776
Watson	MS	5	0.50	0.65	35,347,433
Yates	GA	1	0.45	0.48	4,977,822
Yates	GA	2	0.45	0.48	4,976,029
Yates	GA	3	0.45	0.48	4,080,042
Yates	GA	4	0.45	0.40	6,554,969
Yates	GA	5	0.45	0.40	6,415,254
Yates	GA	6	0.45	0.33	19,199,860
Yates	GA	7	0.45	0.30	15,577,083
ı alcə	L GA		I 0.40	1 0.30	10,077,000

STEP 1 Continue the Identification of units from Step 1, page 1, here.

Effective: 1/6/98

# (FOR INTERNAL USE ONLY) State of Florida summary checklist for Title V permit applications (cont'd)

II. Application logging.  ARMS Permit Number assigned 0 0500 14-008-AV logged into ARMS by initials date 8 /11 /03	
III. Initial distribution of application.	
a. Disposition of 4 paper/electronic copies submitted:  1- Clean originals to file? Y N  1 District Y N  1 County [affected local program]? Y N  1- Permit engineer(s)	
b. Disposition of electronic files submitted:  copy placed onto PC? Y N	
c Disposition of ELSA submitted:  version used [circle]: 1.0 1.1 1.2.1 1.3 1.3a 1.3b  Uploaded to EARS? Y N by date // //	
d. Electronic information submitted previewed? Y NN/A	
Comment(s):	
<del></del>	
<u> </u>	
	<u> </u>
(this checklist was developed from Rule 62-213.420(1)(b)2., F.A.C. and DARM pol	icy}
6/19/02	

# (FOR INTERNAL USE ONLY) State of Florida summary checklist for Title V permit applications

Facility Owner/Operator Name: Colf Power (Umplay) Facility ID No.: 0 0 5 0 0 1 4 Site Name: Smth P	N 1
County: By	1/1/1
application receipt date 08/01/03	
I. Preliminary scanning of application submitted.	
	date//
g. Entire hard copy of Section I. provided (Pages 1-11 of form)? Facility identified (Page 1)? [if not complete a Page 1] R.O. certification signed and dated (Page 2)? P.E. certification signed and dated (Page 7)?	
h. Any confidential information submitted?  If yes, R.O. provided hard copy to us and EPA?  If yes, hard copy locked up and note filed with application?	Y N Y* N Y* N
i. Type of application filed. Revision  TV renewal application only?  Initial TV application only?  All units demonstrated initial compliance?  If, not included compliance plan?  Any units subject to acid rain?	Y N Y N Y N Y N
j. CAM Plan submitted?	Y N
Note(s): [*] = mandatory.	
Comment(s):	
Reviewer's initials date os / 07/63 Concurrence i	nitials date//

Certified Mail

GULF POWER

July 21, 2003

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

RECEIVED

AUG 01 2003

**BUREAU OF AIR REGULATION** 

Dear Mr.Sheplak:

RE: Lansing Smith Electric Generating Plant – Title V Revision

Permit Number: 0050014-005-AC

Waterwall Tube Replacement Project Completion

Earlier this year, Gulf Power completed the authorized replacement of waterwall tubing for Smith Unit 2 as outlined in the above referenced construction permit. All conditions outlined in the construction have been met and thus the next stage of permitting is the addition of annual reporting conditions noted in the construction permit into the Lansing Smith Title V Permit.

Please consider this a request for incorporation of special conditions outlined in the above referenced construction permit into the Lansing Smith Title V Permit. Attached is a revised Title V application with approval signatures by the Responsible Official and Professional Engineer.

Please let me know if you have any questions regarding our application for revision to the Lansing Smith Title V Permit.

Sincerely,

G. Dwain Waters, Q.E.P.

Air Quality Programs Supervisor

cc:w/o attachment:

J. O. Vick, <u>Gulf Power Company</u>
Trey Hall, <u>Gulf Power Company</u>
Marie Largilliere, <u>Gulf Power Company</u>
Danny Herrin, <u>Southern Company Services</u>
Gary Perko, <u>Hopping</u>, <u>Green & Smith</u>
Sandra Veazey, <u>FDEP-NWF District</u>



# Department of Environmental Protection Division of Air Resource Management AUG 01 2003 APPLICATION INFORMATION APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review,
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review.
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)

- Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

### **Identification of Facility**

1.	Facility Owner/Company Name: Gulf Power Company
2.	Site Name: Lansing Smith Electric Generating Plant
3.	Facility Identification Number: 0050014
4.	Facility Location: Street Address or Other Locator: 4300 County Road 2300
	City: Southport County: Bay Zip Code: 32409
5.	Relocatable Facility?  Yes No  6. Existing Title V Permitted Facility?  Yes No
<u>Ap</u>	plication Contact
1.	Application Contact Name: G. Dwain Waters
2.	Application Contact Mailing Address Organization/Firm: Gulf Power Company
	Street Address: One Energy Place
	City: Pensacola State: Florida Zip Code: 32520-0328
3.	Application Contact Telephone Numbers
	Telephone: (850) 444-6527 ext. Fax: (850) 444-6217
4.	Application Contact Email Address: gdwaters@southernco.com
Ap	oplication Processing Information (DEP Use)
	Date of Receipt of Application:
2.	Project Number(s):
3.	PSD Number (if applicable):

DEP Form No. 62-210.900(1) - Form

Effective: 06/16/03 1

4.	Siting Number (if applicable):	

DEP Form No. 62-210.900(1) - Form Effective: 06/16/03

### Purpose of Application

This application for air permit is submitted to obtain: (Check one)
Air Construction Permit  Air construction permit.
Air Operation Permit  ☐ Initial Title V air operation permit.  ☐ Title V air operation permit revision.  ☐ Title V air operation permit renewal.  ☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.  ☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.
Air Construction Permit and Revised/Renewal Title V Air Operation Permit  (Concurrent Processing)  ☐ Air construction permit and Title V permit revision, incorporating the proposed project.  ☐ Air construction permit and Title V permit renewal, incorporating the proposed project.
Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:
☐ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.
Application Comment
The purpose of this application is to update the Title V permit to incorporate new reporting requirements as outlined in the Lansing Smith "Waterwall" construction permit (0050014-005-AC) See the Smith "Waterwall Project" Construction permit for details.

3

DEP Form No. 62-210.900(1) - Form Effective: 06/16/03

### **Scope of Application**

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
001	Boiler Number 1- 1944.8 MMBtu/hr	1	
002	Boiler Number 2 - 2246.2 MMBtu/hr	2	
003	Combustion Turbine - 542 MMBtu/hr	3	
004	170 MW Gas Combustion Turbine & HRSG & Duct Burner	4	
005	170 MW Gas Combustion Turbine & HRSG & Duct Burner	5	
006	Cooling Tower	6	
007	Material Handling of Coal and Ash	7	
008	Fugitive PM Sources	8	
009	General Purpose Internal Combustion	9	
		·	

Application Processing Fee	
Check one: Attached - Amount: \$	Not Applicable

DEP Form No. 62-210.900(1) - Form

Effective: 06/16/03 4

### Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1.	Owner/Authorized Representativ	ve Name :				
2.	Owner/Authorized Representative Organization/Firm:	ve Mailing Addres	S			
	Street Address:					
	City:	State:		Zip C	ode:	
3.	Owner/Authorized Representative	ve Telephone Num	bers			
	Telephone: ( ) -	ext.	Fax: (	)	-	
4.	Owner/Authorized Representative	e Email Address:				
5.	Owner/Authorized Representative	e Statement:				
	I, the undersigned, am the owner this air permit application. I her reasonable inquiry, that the state complete and that, to the best of application are based upon reaspollutant emissions units and air will be operated and maintained of air pollutant emissions found Department of Environmental Pridentified in this application to we granted by the department, cannot department, and I will promptly facility or any permitted emission	reby certify, based ements made in the my knowledge, and onable techniques on the sone of the statutes of the control and revision the transferred to notify the departments.	on informis application in the state of the	rmation an ation are to tes of emis rulating em ent describ pplicable sof Florida reof and a I understauthorization sale or le	d belief formed after rue, accurate and sisions reported in this issions. The air ed in this application and rules of the all other requirements and that a permit, if on from the	is n l
	Signature		Da	ite		

5

DEP Form No. 62-210.900(1) - Form

### **Application Responsible Official Certification**

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

10	sponsible official.
1.	Application Responsible Official Name: Gene L. Ussery, Jr.
2.	Application Responsible Official Qualification (Check one or more of the following options, as applicable):
	For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
	For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
	For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
	The designated representative at an Acid Rain source.
3.	Application Responsible Official Mailing Address Organization/Firm: Gulf Power Company
	Street Address: One Energy Place
	City: Pensacola State: Fl Zip Code: 32520-0100
4.	Application Responsible Official Telephone Numbers Telephone: (850) 444-6383 ext. Fax: (850) 444-6744
5.	Application Responsible Official Email Address: GLUSSERY@southernco.com
6.	Application Responsible Official Certification:
	I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.
_	7.21.03
	Signature Date

6

DEP Form No. 62-210.900(1) - Form

Effective: 06/16/03

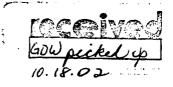
Pr	Professional Engineer Certification					
1.	Professional Engineer Name: Gregory N. Terry					
	Registration Number: 52786					
2.	Professional Engineer Mailing Address Organization/Firm: Gulf Power Company					
	Street Address: One Energy Place					
	City: Pensacola State: Fl Zip Code: 32520-0340					
3.	Professional Engineer Telephone Numbers					
	Telephone: (850) 429-2381 ext. Fax: (850) 429-2246					
4.	Professional Engineer Email Address: GNTERRY@southernco.com					
5.	Professional Engineer Statement:					
	I, the undersigned, hereby certify, except as particularly noted herein*, that:					
	(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and					
	(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.					
	(3) If the purpose of this application is to obtain a Title V air operation permit (check here $\boxtimes$ , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.					
	(4) If the purpose of this application is to obtain an air construction permit (check here $\square$ , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here $\square$ , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.					
いいか。への兄の	(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here , siftso), I further, certify that, with the exception of any changes detailed as part of this application, changes detailed as part of this appli					
	Signature / Date					

DEP Form No. 62-210.900(1) - Form

Effective: 06/16/03 7

<sup>\*</sup>Attach any exception to certification statement.

# STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



### **NOTICE OF FINAL PERMIT**

In the Matter of an Application for Permit by:

Gulf Power Company Lansing Smith Generating Plant One Energy Place Pensacola, Florida 32520-0328 Permit No. 0050014-005-AC
Facility ID No. 0050014
Lansing Smith Generating Plant
Unit 2 Waterwall Tube Replacement

Authorized Representative:

Mr. James O. Vick, Manager of Environmental Affairs

Enclosed is Final Air Permit No. 0050014-005-AC, which authorizes the replacement of all the waterwall tubing for Unit 2 at the Lansing Smith Electric Generating Plant. The existing facility is located at 4300 County Road in Bay County. As noted in the Final Determination (attached), only minor changes to correct typographical errors were made. 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 thirty (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

A. A. Linero

Bureau of Air Regulation

### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that the original Notice of Final Permit (including the Final permit) was hand delivered to a representative of Gulf Power Company. Copies were sent by certified mail (\*) and U.S. Mail before the close of business on 10/18/02 to the persons listed:

Mr. James O. Vick, Gulf Power Company\*

Mr. G. Dwain Waters, Gulf Power Company

Ms. Kay Prince, EPA Region 4

Ms. Beverly Spagg, EPA Region 4

Ms. Mary Jean Yon, NED

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.

)

### FINAL DETERMINATION

### **PERMITTEE**

Gulf Power Company
Lansing Smith Generating Plant
One Energy Place
Pensacola, Florida 32520-0328

### PERMITTING AUTHORITY

Florida Department of Environmental Protection Division of Air Resources Management Bureau of Air Regulation New Source Review Section 2600 Blair Stone Road, MS #5505 Tallahassee, Florida, 32399-2400

### **PROJECT**

Air Permit No. 0050014-005-AC Unit 2 Waterwall Tube Replacement

This permit authorizes the replacement of all the waterwall tubing for Unit 2 at the Lansing Smith Electric Generating Plant. The facility is located at 4300 County Road in Bay County. The project is not subject to PSD preconstruction review.

### NOTICE AND PUBLICATION

The Department distributed an "Intent to Issue Permit" package on September 27, 2002. The applicant published the "Public Notice of Intent to Issue" in The News Herald on October 2, 2002. The Department received the proof of publication on October 10, 2002. No requests for administrative hearings were filed.

### **COMMENTS**

No comments on the Draft Permit were received from the public or the Department's Northwest District Office. The applicant submitted information correcting the estimated baseline NOx emissions from 2875 tons per year to 2859 tons per year. This small correction is noted, but it does not change any previous determinations or conditions of the permit.

### CONCLUSION

Only minor revisions were made to correct typographical errors. The final action of the Department is to issue the permit with the changes described above.



# Department of Environmental Protection

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

David B. Struhs Secretary

### PERMITTEE

Gulf Power Company
Lansing Smith Generating Plant
One Energy Place
Pensacola, Florida 32520-0328

Permit No. 0050014-005-AC

Expires: July 1, 2003

Facility ID No. 0050014 (SIC No. 4911) Unit 2 Waterwall Tube Replacement

### PROJECT AND LOCATION

This permit authorizes the replacement of all the waterwall tubing for Unit 2 at the Lansing Smith Electric Generating Plant. The facility is located at 4300 County Road in Bay County. The map coordinates are: UTM Zone 16, 625.03 km East and 3349.08 km North; and Latitude: 30° 16' 08" North and Longitude: 85° 42' 01" West.

### STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the work specified 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 permit supplements all other air construction and operation permits for the subject emissions unit and does not alter any requirements from such previously issued air permits.

### APPENDICES

The following appendices are attached as part of this permit.

Appendix GC - Construction Permit General Conditions

Howard L. Rhodes, Director

Division of Air Resources Management

### FACILITY DESCRIPTION

This facility consists of two coal-fired boilers (Acid Rain Phase II Units), two oil-fired combustion turbines used to drive two separate peaking generators driven by a single jet engine, and two gas-fired combustion turbines serving a single steam-electrical generator (Acid Rain Phase II Units).

### **PROJECT**

The proposed project affects the following existing emissions unit:

ID No.	Emission Unit Description
002	Unit 2 (Boiler No. 2) is an existing tangentially fired, dry bottom boiler firing pulverized coal as the primary fuel with a nominal generating capacity of 205 MW.

### REGULATORY CLASSIFICATION

Title III: Based on the initial Title V permit, the facility is a major source of hazardous air pollutants.

Title IV: The facility operates emissions units that are subject to the Phase II, Federal Acid Rain Program.

<u>Title V</u>: The facility is classified as a "major" source of air pollution with respect to Title V of the Clean Air Act because emissions of at least one regulated criteria air pollutant exceeds 100 tons per year.

<u>PSD</u>: The project is located in an area designated as "attainment" or "unclassifiable" for each pollutant subject to a National Ambient Air Quality Standard. The facility is considered a "fossil fuel fired steam electric plant of more than 250 million BTU per hour of heat input", which is one of the 28 PSD source categories with the lower PSD applicability threshold of 100 tons per year. Potential emissions of at least one regulated pollutant exceed 100 tons per year. Therefore, the facility is classified as a PSD-major source of air pollution with respect to Rule 62-212.400, F.A.C., the Prevention of Significant Deterioration (PSD) of Air Quality.

NSPS: The new combustion turbines for Unit 3 are subject to Subpart GG of the New Source Performance Standards in 40 CFR 60.

### RELEVANT DOCUMENTS

- Letter with summary of waterwall tube replacement for Unit 2 received on August 26, 2002;
- Air Permit No. PSD-FL-269 (PA99-40) issued for the construction of combined cycle Unit 3;
- Current Title V Air Operation Permit No. 0050014-001-AV, as amended; and
- Department's Technical Evaluation and Preliminary Determination dated September 27, 2002.



### SECTION II. ADMINISTRATIVE REQUIREMENTS

### GENERAL AND ADMINISTRATIVE REQUIREMENTS

- 1. <u>Permitting Authority</u>: All documents related to applications for permits to construct, modify or operate this emissions unit shall be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (DEP), at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and phone number 850/488-0114. Copies of these documents shall be submitted to the Compliance Authority.
- 2. <u>Compliance Authority</u>: All documents related to compliance activities such as reports, tests, and notifications should be submitted to the Northwest District Office at 160 Governmental Center, Pensacola, Florida 32501-5794. The phone number is 850/595-8300 and the fax number is 850/595-4417.
- 3. <u>General Conditions</u>: The owner and operator are subject to, and shall operate under, the attached General Conditions listed in *Appendix GC* of this permit. General Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
- 4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of this project shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (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 facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
- 5. <u>Permit Expiration</u>: For good cause, the permittee may request that this air construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation at least sixty (60) days prior to the expiration of this permit. [Rules 62-4.070(4), 62-4.080, and 62-210.300(1), F.A.C.]
- 6. 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.]
- 7. <u>Modifications</u>: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
- 8. <u>Title V Permit</u>: This permit authorizes construction of the proposed project and initial operation to determine compliance with Department rules. Upon completion of construction of this project, a Title V operation permit revision is required for regular operation of the new equipment. The permittee shall apply for a revised Title V operation permit prior to expiration of this permit. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]



### SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

### EU 002. Unit 2 - 205 MW Coal-Fired Boiler

The proposed project affects the following existing unit:

ID No.	Emission Unit Description		
002	Unit 2 (Boiler No. 2) is a tangentially fired, dry bottom boiler firing pulverized coal as the primary fuel and distillate oil for purposes of startup and flame stabilization. It began commercial operation on April 9, 1967. The maximum heat input rate is 2246 MMBtu per hour with a nominal generating capacity of 205 MW. Particulate matter emissions are controlled by both a hot side and a cold side electrostatic precipitator. NOx emissions are reduced by separated Low-NOx Concentric Firing System (LNCFS) and separated overfired air dampers (SOFA). It is a Phase II Acid Rain Unit. The following parameters are continuously monitored for this unit: NOx, opacity, SO2, CO2, and stack gas flow.		

### ADMINISTRATIVE REQUIREMENTS

1. <u>Previous Permit Conditions</u>: This permit authorizes the replacement of all the waterwall tubing for existing Unit 2. The following conditions are in addition to those of any other air construction or operation permits. [Rule 62-4.210, F.A.C.]

### **CONSTRUCTION ACTIVITIES**

- 2. Waterwall Tube Replacement: The permittee is authorized to replace the existing waterwall tubes in Unit 2. In general, this consists of cutting the waterwall tubes from the lower ring headers just below the steam drum in the penthouse. The vertical tube length is approximately 120 feet and the total surface area is approximately 19,340 square feet. Materials will be replaced with like-kind materials and no operational or capacity increases will result from the project. The project does not involve any work on the steam drum. It is estimated that the project will be completed within approximately 20 weeks. [Applicant Request]
- 3. <u>Unconfined Particulate Emissions</u>: During the construction period, unconfined particulate emissions shall be minimized by dust suppressing techniques such as covering, enclosing, applying water or chemicals to the affected areas, or any combination of techniques, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

### NOTIFICATIONS AND REPORTS

- 4. Notifications: Within one week of beginning construction, the permittee shall notify the Compliance Authority that the project has commenced and provide a general schedule of construction activities. Within one week of completing construction, the permittee shall notify the Compliance Authority that the project has concluded and provide a general schedule of bringing the unit back on line. [Rule 62-4.210, F.A.C.]
- 5. <u>PSD Applicability Report</u>: The permittee shall maintain information demonstrating that the project did not result in any significant net emissions increase, which is defined in Rule 62-212.400(2)(e), F.A.C. as follows:

Net Emissions Increase. A modification to a facility results in a net emissions increase when, for a pollutant regulated under the Act, the sum of all of the contemporaneous creditable increases and decreases in the actual emissions of the facility, including the increase in emissions of the modification itself and any increases and decreases in quantifiable fugitive emissions, is greater than zero.

Significant Net Emissions Increase. A significant net emissions increase of a pollutant regulated under the Act is a net emissions increase equal to or greater than the applicable significant emission rate listed in Table 212.400-2, Regulated Air Pollutants – Significant Emission Rates.



### SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

### EU 002. Unit 2 - 205 MW Coal-Fired Boiler

The permittee shall submit an annual report to the Department of such information for a period of 5 years representative of normal post-change operations of the unit (within the period not longer than 10 years following the change). For an existing electric utility steam-generating unit, actual emissions of the unit following a physical or operational change shall equal the representative actual annual emissions of the unit following the physical or operational change. The following definition of "representative actual annual emissions" found in 40 CFR 52.21(b)(33) is adopted and incorporated by reference in Rule 62-204.800, F.A.C.

Representative actual annual emissions means the average rate, in tons per year, at which the source is projected to emit a pollutant for the two-year period after a physical change or change in the method of operation of a unit, (or a different consecutive two-year period within 10 years after that change, where the Administrator determines that such period is more representative of normal source operations), considering the effect any such change will have on increasing or decreasing the hourly emissions rate and on projected capacity utilization. In projecting future emissions the Administrator shall:

- (i) Consider all relevant information, including but not limited to, historical operational data, the company's own representations, filings with the State or Federal regulatory authorities, and compliance plans under title IV of the Clean Air Act; and
- (ii) Exclude, in calculating any increase in emissions that results from the particular physical change or change in the method of operation at an electric utility steam generating unit, that portion of the unit's emissions following the change that could have been accommodated during the representative baseline period and is attributable to an increase in projected capacity utilization at the unit that is unrelated to the particular change, including any increased utilization due to the rate of electricity demand growth for the utility system as a whole."

Each required annual report shall be submitted to the Department prior to August 1<sup>st</sup> and shall quantify operations for the previous calendar year(s).

[Rules 62-204.800, 62-210.200(11) and 62-212.400(2), F.A.C.; and 40 CFR 52.21(b)(33)]



### SECTION IV. EMISSIONS UNIT SPECIFIC CONDITIONS

### Appendix GC - Construction Permit General Conditions

- G.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.
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.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.
- G.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.
- G.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.
- G.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.
- G.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.

- G.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.

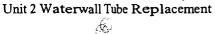
G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case 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 Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.



### SECTION IV. EMISSIONS UNIT SPECIFIC CONDITIONS

### Appendix GC - Construction Permit General Conditions

- G.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.
- G.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.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.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).
- G.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
    - The results of such analyses.
- G.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.



Air Permit No. 0050014-005-AC



# Department of Environmental Protection

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

David B. Struhs
Secretary

April 16, 2003

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James O. Vick Manager, Environmental Affairs Gulf Power Company One Energy Place Pensacola, FL 32520-0328

Re: DEP Permit No. 0050014-005-AC
Lansing Smith Generating Plant
Unit 2 Waterwall Tube Replacement Project, Extension of Construction Permit

Dear Mr. Vick:

The Florida Department of Environmental Protection (Department) reviewed your correspondence dated April 4, 2003 in which you requested an extension of the construction permit for the Unit 2 waterwall tube replacement project at the Lansing Smith Generating Plant, Bay County, Florida.

The expiration date is hereby extended from July 1, 2003 to January 1, 2004. All physical construction for the project is scheduled to be completed on or about April 16, 2003 when Unit 2 resumes operation following the tubing replacement outage. This permit modification does not authorize any additional construction. The purpose of the extension is to allow sufficient time following the completion of physical construction for the unit to be operated and tested and for you to file a timely and complete application for a Title V air operation permit.

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

"More Protection, Less Process"

Mr. James O. Vick April 16, 2003 Page 2 of 4

A petition that disputes the material facts on which the Department'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 how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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 Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

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

Mr. James O. Vick April 16, 2003 Page 3 of 4

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

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

This permitting decision is issued pursuant to Chapter 403, F.S. Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., 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 thirty days after this order is filed with the clerk of the Department.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. Executed in Tallahassee, Florida.

Howard L. Rhodes, Director Division of Air Resource

Management

Mr. James O. Vick April 16, 2003 Page 4 of 4

### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this permit modification was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 4/17/03 to the person(s) listed:

James O. Vick, Gulf Power\*
G. Dwain Waters, Gulf Power
Kevin White, DEP NWD

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)

(Date)

# (FOR INTERNAL USE ONLY) State of Florida summary checklist for Title V permit applications (cont'd)

	. Initial distribution of application.
a.	Disposition of 4 paper/electronic copies submitted:  1- Clean originals to file? Y N  1- N District Y \sqrt{_N}  1- County [affected local program]? Y N  1- Permit engineer(s) \sqrt{_N},
b.	Disposition of electronic files submitted:  copy placed onto PC? Y N
c.	Disposition of ELSA submitted:  version used [circle]: 1.0 1.1 1.2.1 1.3 1.3a 1.3b  Uploaded to EARS? Y N by date/_/
<b>d</b> . :	Electronic information submitted previewed? Y N N/A
Co	mment(s):

Apcheck.doc

# (FOR INTERNAL USE ONLY) State of Florida summary checklist for Title V permit applications

Facility Owner/Operator Name: Solt Power Congany Facility ID No.: 0 0 5 0 0.1 4 Site Name: Smake County:	Plat	
County:		
application receipt date 06/16/03		
I. Preliminary scanning of application submitted.	_	
a. Was application submitted to correct permitting authority?	Y <u>V</u>	N N N
b. Was an application filed?	Y* <u>✓</u>	N
c. Was the application filed timely?	Y*	
d. Application format filed [check one].		
Hard copy of official version of form? ELSA?		
A facsimile of official version of form? Some combi		N
<ul><li>e. 4 copies (paper/electronic) submitted?</li><li>f. Electronic diskettes protected/virus scanned/marked?</li></ul>	Y N	$N/\Delta$
by	da	ite//
g. Entire hard copy of Section I. provided (Pages 1-11 of form)?	Y	N 🗠
Facility identified (Page 1)? [if not complete a Page 1]	Y*	[Attached]
R.O. certification signed and dated (Page 2)?	Y*	N
P.E. certification signed and dated (Page 7)?	Y*	N
h. Any confidential information submitted?	Y	N <u>~</u>
If yes, R.O. provided hard copy to us and EPA?	Y*	N <u> </u>
If yes, hard copy locked up and note filed with application?	Y*	N
i. Type of application filed.		
TV renewal application only?	Y	N
Initial TV application only?	<del>-Y</del>	N N N
All units demonstrated initial compliance?	Y	N
If, not included compliance plan?	Y	N
Any units subject to acid rain?	Y	N
j. CAM Plan submitted?		N
Note(s): [*] = mandatory.		
Comment(s):	<u></u>	
Reviewer's initials date 66 / 16 / 63 Concurrence	initiale	date / /

One Energy Place Pensacola, Florida 32520

Tel 850.444.6111

\*

# RECEIVED

JUN 16 2003

**BUREAU OF AIR REGULATION** 

Certified Mail



June 6, 2003

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

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Dear Mr.Sheplak:

RE: Lansing Smith Electric Generating Plant – Title V Revision

Permit Number: 0050014-005-AC

Waterwall Tube Replacement Project Completion

Earlier this year, Gulf Power completed the authorized replacement of waterwall tubing for Smith Unit 2 as outlined in the above referenced construction permit. All conditions outlined in the construction have been met and thus the next stage of permitting is the addition of annual reporting conditions noted in the construction permit into the Lansing Smith Title V Permit.

Please consider this a request for incorporation of special conditions outlined in the above referenced construction permit into the Lansing Smith Title V Permit. Attached is a completeness statement certified by a professional engineer and the authorized Responsible Official for the Lansing Smith Electric Generating Plant.

Please let me know if you have any questions regarding our application for revision to the Lansing Smith Title V Permit.

Sincerely,

G. Dwain Waters, Q.E.P.

Air Quality Programs Supervisor

cc:w/o attachment:

J. O. Vick, <u>Gulf Power Company</u>
Trey Hall, <u>Gulf Power Company</u>
Marie Largilliere, <u>Gulf Power Company</u>
Danny Herrin, <u>Southern Company Services</u>
Gary Perko, <u>Hopping</u>, <u>Green & Smith</u>

Sandra Veazey, FDEP- NWF District

### **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 request is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this request are true, accurate and complete."

Responsible Official Signature:

Gene L. Ussery, Jr.

**Vice-President of Power Generation** 

6-10-03

Date:

# LANSING SMITH UNIT 2 WATERWALL REPLACEMENT PROJECT COMPLETION CERTIFICATION BY PROFESSIONAL ENGINEER

"I, the undersigned, am a registered professional engineer in the State of Florida and hereby certify to the best of my knowledge that all information being submitted concerning the completion of the waterwall tube replacement as outlined in the construction permit for Lansing Smith Unit 2 is true, accurate and complete."

Professional Engineer Signature:

Gregory N. Terry

Registration Number: 52786

6-5-2003

Date