

**NOTICE OF FINAL PERMIT**

In the Matter of an  
Application for Permit:

Mr. Gene L. Ussery, Jr.  
V.P. of Power Generation  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520

DEP File No.: 0630014-003-AC  
Jackson County

Enclosed is the Final Air Construction Permit, No. 0630014-003-AC. The subject of the permit (letter) is to allow Gulf Power Company to conduct the requested testing and measurements on its Scholz Electric Generating Plant's Units Nos. 1 & 2's ESP (electrostatic precipitator) located in Sneads, Jackson County. This permit (letter) is issued pursuant to Chapter 403, Florida Statutes (F.S.). There were no comments received during the Public Notice period.

Any party to this order (permit) has the right to seek judicial review of the permit (letter) pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

Trina L. Vielhauer  
Chief  
Bureau of Air Regulation

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the Final Permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 6/12/03 to the person(s) listed or as otherwise noted:

- Mr. Gene L. Ussery, Jr. \*, V.P. of Power Generation, GPC
- Ms. Sandra Veazey, NWD
- Mr. Kevin White, NWD
- Mr. Henry Hernandez, NWDB
- Mr. Gregory N. Terry, P.E., GPC

6/12/03 cc: Bruce Mitchell  
Reading File Clerk Stamp

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

Barbara J. Friday - Friday 6/12/03  
(Clerk) (Date)

**Final Determination**

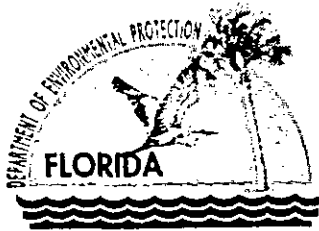
Gulf Power Company  
Scholz Electric Generating Plant

Air Construction Permit No.: 0630014-003-AC

Jackson County

An Intent to Issue an air construction permit to Gulf Power Company's Scholz Electric Generating Plant, located in Sneads, Jackson County, Florida, was distributed on May 9, 2003. The Public Notice of Intent to Issue an Air Construction Permit was published in the Panama City News Herald on May 16, 2003. There were no comments submitted in response to the Public Notice.

The final action of the Department will be to issue the air construction permit as noticed.



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

June 11, 2003

CERTIFIED MAIL – Return Receipt Requested

Mr. Gene L. Ussery, Jr.  
V.P. of Power Generation  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520

Dear Mr. Ussery:

RE: Final Authorization to Conduct Additional Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Scholz Electric Generating Plant's Units Nos. 1 & 2's Electrostatic Precipitator (ESP)  
0630014-003-AC

The Department has reviewed the request that you provided on April 28, 2003. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Scholz Electric Generating Plant's Units Nos. 1 & 2's ESP (electrostatic precipitator) located in Sneads, Jackson County. The purpose is to help the company address Compliance Assurance Monitoring (CAM), which will have to be addressed regarding the ESP upon renewal of their Title V Operation Permit. Paragraph 403.061(16), Florida Statutes (F.S.), authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide reasonable and practical regulatory controls consistent with public interest.

In accordance with the provisions of Paragraphs 403.061(16) and (18), F.S., and Rule 62-210.700(5), F.A.C., you are hereby authorized to conduct additional pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Scholz Electric Generating Plant's Units Nos. 1 & 2's ESP. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions and opacity standards. The data gathered will allow an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Scholz Units Nos. 1 & 2's ESP to be further calibrated. The pollutants and or parameters to be measured or monitored will include sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), particulate matter, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also.

*"More Protection, Less Process"*

*Printed on recycled paper.*

Mr. Gene L. Ussery, Jr.  
Gulf Power Company  
Scholz Electric Generating Plant: Units Nos. 1 & 2  
0630014-003-AC  
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The performance tests and parameter measurements or monitoring shall be subject to the following conditions:

1. Unless waived, the permittee shall notify the Department's Northwest District Office, Northwest District Branch Office - Tallahassee, and Bureau of Air Regulation Office at least 15 days prior to commencement of the performance tests and parameter measurements or monitoring. A written report shall be submitted to these offices within 45 days upon completion of the last test run and parameter measurements and monitoring.
2. The authorized testing and measurement and monitoring schedule is from September 1 through December 31, 2003. If additional time is needed, the permittee shall provide the Department with documentation of the progress accomplished to date and shall identify what is left to be done to complete the testing and measurements or monitoring.
3. The parameters to be measured or monitored are sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), particulate matter, carbon dioxide (CEM), ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model. Particulate size distribution may be evaluated also.
4. Emissions testing shall be conducted concurrently for the following pollutants and using the following test methods:
  - a. Particulate matter                   EPA Test Method 17 (including EPA Test Methods 1 thru 4)
  - b. Visible emissions                   EPA Test Method 9
5. The performance test plans are as follows:
  1. Conduct a performance test (three 1-hour runs) using EPA Method 17 at "normal" operations;
  2. Conduct a performance test (three 1-hour runs) using EPA Method 17 at a reduction in the ESP efficiency; and,
  - 3.a. If the test results show that the PM allowable limit was exceeded; then the ESP's efficiency will be increased and a third performance test using EPA Method 17 will be conducted (supposedly between "normal" and "at the reduced efficiency"); or,
  - b. If the test results show that the PM allowable limit was not exceeded; then the ESP's efficiency will be further decreased and a third performance test using EPA Method 17 will be conducted in an attempt to define the outer range of the ESP's efficiency at which the PM allowable limit will be exceeded; and,
  - c. If the outer range is not established by the 2<sup>nd</sup> and 3<sup>rd</sup> performance tests, then the performance testing is ended for that emissions unit; and, Gulf Power Company will use the data to help define their CAM Plan for that emissions unit tested.
6. The release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C., is not authorized for this activity.
7. Performance testing shall immediately cease upon the occurrence of a valid environmental complaint by a citizen or other party, or a nuisance or danger to the public health or welfare. Performance testing shall not resume until appropriate measures to correct the problem have been implemented.

Mr. Gene L. Ussery, Jr.  
Gulf Power Company  
Scholz Electric Generating Plant: Units Nos. 1 & 2  
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8. The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida.
9. This Department action is just to authorize the performance testing and parameter measurements and monitoring for the Scholz Units Nos. 1 & 2's ESP for the purpose of developing a CAM protocol.
10. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
11. The Department shall be notified in writing on the date of the last test run and parameter measurement and monitoring completion. If after work hours, notification shall occur on the next work day.
12. Attachment Section.
  - a. Mr. Richard "Mike" Markey's letter received April 28, 2003.
  - b. Final Determination.

The Department has relied on the information referenced in the Attachment Section and conversations with representatives of Gulf Power Company in authorizing this activity.

Sincerely,  
  
Howard L. Rhodes, Director  
Division of Air Resource Management

HLR/rbm

Enclosures

cc: Trina L. Vielhauer, DEP - BAR  
Scott Sheplak, DEP - BAR  
Sandra Veazey, DEP - NWD  
Kevin White, DEP - NWD  
Henry Hernandez, DEP - NWDB  
Joe Kahn, DEP - BAMMS  
G. Dwain Waters, Q.E.P., GPC  
Richard "Mike" Markey, P.G., Q.E.P., GPC  
Gregory N. Terry, P.E., GPC

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature *R. Beach*  Agent  
 Addressee

B. Received by (Printed Name) *R. Beach* C. Date of Delivery *6-14-03*

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

1. Article Addressed to:  
 Mr. Gene L. Ussery, Jr.  
 V.P. of Power Generation  
 Gulf Power Company  
 One Energy Place  
 Pensacola, Florida 32520

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number (Transfer from service label) 7000 2870 0000 7028 1150

**U.S. Postal Service  
 CERTIFIED MAIL RECEIPT  
 (Domestic Mail Only; No Insurance Coverage Provided)**

7000 2870 0000 7028 1150

Mr. Gene L. Ussery, Jr.

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark Here

Sent To  
 Mr. Gene L. Ussery, Jr.  
 Street, Apt. No., or PO Box No.  
 One Energy Place  
 City, State, ZIP+4  
 Pensacola, Florida 32520

# INTEROFFICE MEMORANDUM

TO: Howard Rhodes

THRU: Scott Sheplak *SS*  
Trina Vielhauer *TV*

FROM: Bruce Mitchell *BM*

DATE: June 10, 2003

SUBJECT: Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Scholz Electric Generating Plant's Units Nos. 1 & 2's Electrostatic Precipitators

The proposed project was Public Noticed in the Panama City News Herald on May 16, 2003. There were no comments received during the Public Notice period..

In conclusion, it is recommended that the authorization letter be signed as noticed.

HLR/rbm

Attachment

Howard,

This is something we've done before after consulting w/ Pat. It is actually good that they want to test so close to (and maybe in excess of) permitted limits. This gives us a much better gauge of compliance in the future.

Trina