One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

GULF POWER
A SOUTHERN COMPANY

Certified Mail
7009 0960 0001 2159 6638

September 4, 2009

Mr. Jonathan Holtom P.E.
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5505
Tallahassee, Florida 32399-2400

Dear Mr. Holtom:

RE: SCHOLZ ELECTRIC GENERATING PLANT
REQUEST FOR ADDITIONAL INFORMATION RESPONSE
AIR PERMIT NO. 0630014-010-AV

On July 16, 2009, Gulf Power received a Request for Additional Information (RAI) for the Scholz Title V renewal application filed on May 18, 2009. The FDEP inquiry concerns the applicability of the facility's internal combustion engines in regards to NSPS and NESHAPS regulations. In this regards, please find enclosed the requested information on the Scholz internal combustion engines, a revised tanks list, and applicable certifications for the Responsible Official and Professional Engineer for this submittal. We have included a revised tanks list to clarify our application regarding the size and current in-use tank active at the facility.

Please call me at (850) 444 – 6527 regarding any questions regarding this RAI response.

Sincerely,

Dwain Waters, Q.E.P.

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

cc: w/att: Greg Terry, Gulf Power
Kenny Peacock, Gulf Power
Attalla Yousry, FDEP - Tallahassee
Rick Bradburn, FDEP Northwest District

APPLICATION INFORMATION

Application Responsible Official Certification

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

1. Application Responsible Official Name: Theodore J. McCullough

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

   [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.

   [ ] 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, CAIR source, or Hg Budget 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 – 4744

5. Application Responsible Official E-mail Address: TJMCCULL@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.

T J McCullough — Signature

9/4/09 — Date

APPLICATION INFORMATION

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: 32520-0328
3. Professional Engineer Telephone Numbers...:
   Telephone: (850) 444 - 6144 ext. Fax: (850) 444 – 6080
4. Professional Engineer E-mail 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 [X], 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 [ ], 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 [ ], 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 such emissions 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.

Signature 9-3-2009
Date

(seal)

* Attach any exception to certification statement.

FDEP RAI questions on Scholz Internal Combustion Engines & Revised Tanks List.

Building Sump Pump Engine:

- Purchased – Before Year 2000*
- 4 stroke rich burn or combustion ignition - ?
- Detroit Diesel Engine
- 53 Hp
- Maintenance: General service on battery, filters, etc.
- No major maintenance
- Specifics on engine:
  Type – 2 cycle
  Number of cylinders – 3
  Bore (inches) 3.875, Bore (mm) – 98
  Stroke (inches) 4.5, Stroke (mm) – 114
  Compression Ratio (Nominal, Standard engine) – 17-1
  Compression Ratio (Nominal, "N" engines) – 21-1
  Total displacement cubic inches – 159
  Total displacement liters – 2.61
  Number of main bearings – 4
- Equipment test – Test run weekly for approximately 15 minutes each

Yard Sump Pump Engine

- Purchased – Before Year 2000*
- 4 stroke rich burn or combustion ignition - ?
  - Deutz F3L914 - Diesel
  - 54 Hp
  - Specifications:
    3 cylinders
    Total displacement (cm3) – 3236
    Cylinder arrangement – vertical in line
    Bore (mm) – 102
    Stroke (mm) – 132
    Compression ratio – 20
    Working cycle- 4 stroke naturally aspirated diesel engine
    Combustion system – Direct injection
    Direction of rotation seen on flywheel - counter clock wise
    Weight including cooling system to DIN 70020-A without starter or alternator (approx. Kg) – 270
    Lubrication – pressure lubrication
    SAE oil – 15W40
    Oil temperature in oil pan – 135C
  - No scheduled test run - Equipment runs whenever retainment (located on the south west corner of the parking lot) area fills up due to rain.
  - Maintenance – general service as needed
  - No major maintenance

Fire Pump Engine

- Purchased – Before Year 2000*
- 4 stroke rich burn or combustion ignition - ?
- Cummings engine - Diesel
- Hp 255
- RPM – 1750
- Aspiration – turbo charged
- Cylinders – 6
- Bore and stroke Inch (mm) – 5 ½ x 6 [140 x 152]
- Test run – Test run this equipment once a week for about 15 minutes
- Maintenance – general service as needed
- Major maintenance to repair internals in the late 90's – damaged head, repaired by Tractor Equipment company

Emergency Generator Engine

- Purchased – Before Year 2000*
- 4 stroke rich burn or combustion ignition - ?
- Engine made by Caterpillar Tractor Company - Diesel
- Engine specifications:
  Serial # 30A03515
  Model # 3208
  Perf. Spec. - 0T6155
  AR # - 1W7199
  MAX ALT – 3200M
  Full load static fuel – 3.98mm
  Full torque static fuel – 4.08mm
  HP – 0143 kw
  Power – 192
  Bare Engine Hi Idle rpms – 1858
  Full load rpms – 1800
  Fuel timing – 15.0 BTC
- Maintenance – general service as needed
- Test run – Test run this equipment once a week for about 15 minutes
- No major maintenance

* An actual purchased date is not available but all Scholz Internal Combustion Engines were purchased prior to Year 2000.

Revised Tanks List

- Supply tank for emergency generator and emergency fire pump – 500 gallons
- Used oil tank – 550 gallons
- Lighter Oil tank – 15,000 gallons

SCHOLZ INTERNAL COMBUSTION ENGINE (ICE) REGULATORY ANALYSIS:

The following Internal Combustion Engines are not subject to any applicable requirements under 40 CFR Part 63 KKKK, 40 CFR Part 60 IIII, or 40 CFR 60 JJJJ because all engines were purchased and installed prior to the applicable regulatory dates:

Scholz Building Sump Pump Engine
Scholz Yard Sump Pump Engine
Scholz Fire Pump Engine
Scholz Emergency Generator Engine