

Mitchell, Bruce

To: Zhu, Yi
Cc: Sheplak, Scott; Fancy, Clair
Subject: ARMS update for Gulf Power Company: 0630014-002-AC: Scholz Electric Generating Plant.

8/1/02

Yi,

I have added a comment to the "Facility Page" regarding the authorization of the CAM testing at the above referenced plant. Take care.

Bruce

Events Scheduled

70 of 90

AIRS ID: **0630014** Site Name: **SCHOLZ ELECTRIC GENERATING PLANT**
 Permit #: **0630014-002-AC** Type/Subtype: **AC / M1** Received: **06/05/2002**
 Project #: **002** Project Name: **(SCHOLZ ELEC. GENERATING PLANT)**

> STOP CLOCK: Done

Event	Begin Date	Period	Due Date	Rmn	Status	End Date
Fee Verification	06/05/2002	2	06/07/2002		Sufficient Fee	06/07/2002
Completeness Review	06/05/2002	30	07/05/2002		Complete	06/05/2002
Determine Agency Action	06/05/2002	90	09/03/2002		Issue	06/26/2002
Mail Public Notice of Intent to Applicant and Date of Publication	06/26/2002	10	07/06/2002		Done	06/26/2002
Awaiting Petition for Administrative Proceeding	06/26/2002	999	03/21/2005		Published	06/28/2002
Issue Final Permit	06/28/2002	14	07/12/2002		Not Received	07/12/2002
ISSUE PERMIT	07/12/2002	14	07/26/2002		Issued	07/12/2002
STOP CLOCK	07/12/2002	1	07/13/2002		Issued	07/12/2002
ARMS Data Entry	07/12/2002	40	07/13/2002		Done	07/12/2002
STOP CLOCK	06/26/2002	1	06/27/2002		Done	06/26/2002

Mitchell, Bruce

To: Waters, Glenn D.
Cc: Fancy, Clair; Sheplak, Scott
Subject: RE: Scholz,Smith,Crist CAM Plan

7/2/02

Dear Sir,

The Department does not intend to remove condition #8, for we consider this to be an engineering study and we expect the P.E. of record to be directly involved (on site) during the testing activities. Only one of the proposed tests will be under normal conditions. After that test, the alteration of the control system, by decreasing the efficiency of the ESP, is not considered to be normal. In addition, the test results are essentially being submitted under the supervision of the P.E. of record. Therefore, the Department feels that there is no compelling reason to remove the requirement and diminish the responsibility that we have imposed upon Mr. Greg Terry, who is the P.E. of record.

Bruce Mitchell
850/413-9198

-----Original Message-----

From: Waters, Glenn D. [mailto:GDWATERS@southernco.com]
Sent: Tuesday, July 02, 2002 2:33 PM
To: Mitchell, Bruce
Subject: Scholz,Smith,Crist CAM Plan

One comment regarding item #8 in each of the above referenced Draft CAM construction permit/plan, i.e. "The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida."

Can we remove this provision? There should be no reason to have a registered PE supervise these tests. Our current plan is to conduct these tests similar to the standard compliance test which is the responsibility of my workgroup and I as their supervisor to coordinate. It is true that Greg Terry (PE) and our RO initially approved the protocol when I submitted it but we currently do not plan on Greg supervising the tests. Greg used to work for me but now is a supervisor at Plant Crist.

Please let me know your thoughts. In the meantime, I will proceed with the public notices for Crist and Smith. Thanks, Dwain

G. Dwain Waters, QEP
Air Quality Programs Supervisor
Gulf Power
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Phone: (850) 444-6527
Fax: (850) 444-6217
Pager: (850) 469-4076
Cell: (334) 350-6527
gdwaters@southernco.com

Mitchell, Bruce

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Memorandum

Florida Department of Environmental Protection

TO: Clair Fancy

THRU: Scott Sheplak

FROM:  Bruce Mitchell

DATE: 6/14/02

SUBJ: Request to Conduct CAM Evaluations from Gulf Power Company
Crist, Schultz and Smith Plants

On June 5th, we received three (3) requests from Mr. Dwayne Waters (Gulf Power Company), requesting a construction permit for authorization to conduct evaluations (performance tests) on opacity, PM, and ash resistively for the CAM affected emissions units located at the above referenced Plants. All of the emissions units are coal fired boilers with ESPs on them for control of PM and opacity. The request indicates the potential of exceeding the PM allowable limit to determine the ESP's efficiency level at which the exceedence will occur, which will help in defining the CAM Plan approach for the emissions unit being tested.

I spoke with Mr. Waters on Wednesday morning and discussed some of the details on the project, mainly about the potential exceedence of the PM emissions limit(s) with any of the affected emissions units. He said that he was being provided only with enough funds to conduct three (3) performance tests per emissions unit. Therefore, the testing 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 2nd and 3rd 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.

Note: Concurrent VE performance testing evaluations will be required while conducting the PM performance tests. I believe that all of the emissions units have COMS in their stacks for continuous opacity readings, which, with the VE readings, should provide additional data to use in developing the CAM Plan for the affected emissions unit.

The Scholtz Plant is tentatively scheduled for July 15th. The AC protocol requires a 14-day Public Notice prior to issuance.

Florida Department of
Environmental Protection

Memorandum

TO: Howard Rhodes

THRU: Clair Fancy

FROM: Bruce Mitchell

DATE: July 12, 2002

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 News Herald on June 28, 2002. On July 2nd, an e-mail message was received from Mr. Dwain Waters, with Gulf Power Company. The request was received during the commenting period (14-days) that ended July 11, 2002. The request was to delete the requirement imposed on the P.E. of record for oversight of the overall testing project. The request was denied.

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

HLR/rbm

Attachment