

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

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BUREAU OF AIR REGULATION

CERTIFIED MAIL



February 10, 2004

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

RE: Curtis H. Stanton Energy Center
Facility ID No: 0950137; ORIS Codes: 0564 and 55821
Intent to Issue Title V Air Operation Permit
Incorporation of Stanton A Combined Cycle Unit

Attached, please find Southern Power – Florida, LLC's comments regarding FDEP's Intent to Issue Title V Air Operation Permit for the Curtis H. Stanton Energy Center dated January 6, 2004, as addressed to Mr. Ronald H. Walston, ARO for the Stanton A Combined Cycle Unit. We have included a statement of certification by the ARO authorizing our comments.

We appreciate the opportunity to supply comments to the draft Title V permit revision and thank you for the quick response time in finalizing this permit. If you have any questions or need further information regarding our comments, please call me at (850) 444.6527.

Sincerely,

A handwritten signature in black ink that reads "G. Dwain Waters, Q.E.P.".

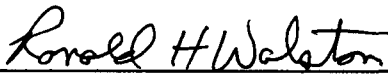
G. Dwain Waters, Q.E.P.
Air Quality Programs Supervisor

cc: Ronald H. Walston, Southern Company
Robert Schaffeld, Southern Company
Heather Turner, Southern Company
James O. Vick, Gulf Power Company
Danny Herrin, Southern Company
Denise Stalls, Orlando Utilities Commission

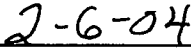
**CERTIFICATION BY RESPONSIBLE OFFICIAL
STANTON A**

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

Responsible Official Signature:



Ronald H. Walston
Stanton A Combined Cycle Site Manager



Date:

Orlando Utilities Commission
OUC/KUA/FMPA/Southern Company – Florida, LLC
Curtis H. Stanton Energy Center (Facility ID No: 0950137)
Addition of Stanton A - Title V Comments:

1) The descriptions for the Combined Cycle Unit in the “Statement of Basis”, Section I. Facility Information and the Section E. Emission Unit 25 & 26 does not include the total nominal megawatt rating as outlined in the PSD permit. We believe it is important to maintain documentation of the added site capacity because the new combined cycle unit was constructed under the existing Curtis H. Stanton Energy Center Site Certification. It is recommended that the following statement be added to the above mentioned sections: “Units 25 and 26 have a total nominal capacity of 640 MW and will achieve approximately 700 megawatts during extreme winter peaking conditions.”

(See pages 1 and 2 of the Statement of Basis, page 2 of Section I Facility Information and page 34, the first paragraph of Section E.)

2) The final bullet item under “Section E. 14. Nitrogen Oxide Emissions” references a compliance procedure described in Specific Condition E. 35. We believe the correct reference should be E. 36 under the 5th bullet outlining ammonia slip determinations in lieu of E.35.

(See page 36 for E.14 and page 42 to review E.35 vs. E.36)

3) We have received new information that the oil fuel storage tank volume is in error as originally outlined in the air application. The correct storage tank volume is 1.86 million gallons in lieu of the permitted 1.68 million gallons. We are contacting the Orange County Tank Coordinator Tom Bessa to correct this record. Please note the error and make any needed change to PSD and Title V permit.