Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

(Sent by Electronic Mail – Return Receipt Requested)

Mr. Michael Burroughs
Vice President
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Re: Title V Air Operation Permit Revision
Proposed Permit No. 0330045-042-AV
Crist Electric Generating Plant

Dear Mr. Burroughs:

One copy of the proposed permit determination for the revision of the Title V air operation permit for the Crist Electric Generating Plant located on Pate Road, off of 10 Mile Road on Governors Bayou, Pensacola, Escambia County, is enclosed. This letter is only a courtesy to inform you that the draft permit has become a proposed permit.

An electronic version of this determination has been posted on the Division of Air Resource Management's World Wide Web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. Interested persons may view the proposed permit by visiting the following website: https://fldep.dep.state.fl.us/air/emission/apds/default.asp and entering the permit number shown above.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the proposed Title V air operation permit is made by the USEPA within 45 days, the proposed permit will become a final permit no later than 55 days after the date on which the proposed permit was mailed (posted) to USEPA. If USEPA has an objection to the proposed permit, the final permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Stephen Hathaway at 850/717-9031.

Executed in Tallahassee, Florida.

David L Read

David Lyle Read, P.E.
2016.05.16 09:53:32
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For:

Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

SA/dlr/sh

Copies sent by electronic mail to the following:

Mr. Michael Burroughs, Vice President, Gulf Power Company: mlburrou@southernco.com
Mr. G. Dwain Waters, Q.E.P., Gulf Power Company: gdwaters@southernco.com
Mr. Greg N. Terry, P.E., Gulf Power Company: gnterry@southernco.com
Mr. Armando Sarasua, DEP-NWD: armando.sarasua@dep.state.fl.us
DEP Siting Office: SCO@dep.state.fl.us
Ms. Alisa Coe, Earth Justice: acoe@earthjustice.org
Ms. Natasha Hazziez, EPA Region 4: hazziez.natasha@epa.gov
Ms. Ana Oquendo, EPA Region 4: oquendo.ana@epa.gov
Ms. Lynn Scearce, DEP OPC: lynn.scearce@dep.state.fl.us
Ms. Barbara Friday, DEP OPC: barbara.Friday@dep.state.fl.us

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

Lynn Scearce

2016.05.16
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Permit No. 0330045-042-AV

I. Public Notice.

An Intent To Issue Air Permit issued to Gulf Power Company for the Crist Electric Generating Plant located at on Pate Road, off of 10 Mile Road on Governors Bayou, Pensacola, Escambia County, was clerked on April 4, 2016. The Public Notice Of Intent To Issue Air Permit was published in Pensacola News Journal on April 7, 2016. The draft Title V air operation permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice Of Intent To Issue Air Permit was received on April 11, 2016.

II. Public Comment(s).

No Comments were received from the public during the 30-day public comment period; however, comments were received from the Permittee. The comments were not considered significant enough to reissue the draft Title V air operation permit and require another Public Notice; therefore, the draft Title V air operation permit was changed. Those comments are addressed below. Additions to the permit are indicated by a double underline. Deletions from the permit are indicated by a ~~strike through~~.

Letter from Gulf Power Company dated April 18, 2016.

Comment 1. Specific Condition A.10. Operation of Sulfur Dioxide (SO_2) Control Devices; b.(1) Startup and Shutdown. Please delete "In addition, during startup, the permittee shall use clean fuels (natural gas and/No. 2 fuel oil) for ignition, and shall use clean fuels to maximum extent possible throughout the startup period. If, in addition to the fuel used prior to initiation of shutdown, another fuel must be used to support the shutdown process, that additional fuel must be one or a combination of the clean fuels and must be used to maximum extent possible, in accordance with 40 CFR 63, Subpart UUUUU (see Specific Condition A.70)" The new language should be removed because it is not related to the topic of this condition - FGD Operation and is redundant with Condition A.70.

Response 1. The language requested to be deleted includes required Work Practice Standards from Table 3 of 40 CFR 63, Subpart UUUUU which apply to coal-fired, liquid-oil fired, or solid oil-derived fuel-fired EGU's during startup and shutdown. These requirements, which help to ensure compliance with the facility's SO_2 emission limits and monitoring requirements, are applicable requirements adopted by reference under Rule 62-204.800(11)(b)102., F.A.C., and are therefore not being deleted from the permit. The referenced condition is related to the bypass of the FGD scrubber, therefore, the Department's proposed language is germane to the condition and no change will be made.

Comment 2. Specific Condition A.10. Operation of Sulfur Dioxide (SO_2) Control Devices; b.(3) Long-Term Maintenance. Please delete "In addition, the permittee shall burn clean fuels to the maximum extent possible during long-term maintenance bypass operations, and shall convert to firing clean fuels as soon as practicable during force majeure outages." The new language is not necessary and without authority under this section.

Response 2. In order to demonstrate and maintain compliance with the monitoring requirements under the alternative sampling procedure (ASP) approved by EPA on December 9, 2014 (attached), the Department finds it necessary to require the Crist Plant to burn clean fuels to the maximum extent possible during planned and unplanned bypass events. According to the approved ASP, bypass events that reach stack SO_2 concentrations of 25 ppmv or greater on an hourly average are required to be reported as monitoring deviations. Therefore, the referenced language is not being deleted from the permit. The statutory authority for the Department's adoption of federal standards can be found at subsection 403.8055, Florida Statutes.

Comment 3. Specific Condition A.10. Operation of Sulfur Dioxide (SO_2) Control Devices; b.(1 &3). Please remove the brackets at the end of this condition which list MATS if items 1 & 2 above are accepted.

Response 3. Please see responses to comments 1. and 2. above.

Comment 4. Specific Condition A.15.f. MATS Sulfur Dioxide (SO_2) Limit. Please delete this new condition. The MATS requirements are already in A.70.b. The language here removes the flexibility MATS provides to switch between SO_2 and HCl and the AC DEP cites in the brackets does not address this condition.

Response 4. In order to provide Gulf Power flexibility in switching between the SO_2 and HCl emission limits, the condition is being deleted as requested. The condition is changed as follows:

> ~~f. *MATS Sulfur Dioxide (SO_2) Limit*. Except for excess emissions due to malfunctions, SO_2 emissions for Units 4-7 shall not exceed 0.20 pounds per million Btu heat input, or 1.5 pounds per megawatt-hour, based on a 30-boiler operating day rolling average. [40 CFR 63, Subpart UUUUU and Permit No. 0330045-041-AC]~~

Comment 5. Specific Condition A.17 Plant-Wide NOx Limit. Please reverse the strikethrough edit in yellow "…operates ~~a minimum of 18 hours~~. ~~The Unit 6 or 7 daily NO_X CEMS rate may consist of less than 18 hours of data if this is due to: CEMS malfunction or invalid CEMS data.~~" Gulf Power is not requesting a revision in the 18 hour averaging for the NOx parameter at Plant Crist. Please correct as follows: "operate a minimum of 18 hours. The Unit 6 or 7 daily NOx CEMS rate may consist of less than 18 hours of data if this due to: CEMS malfunction or invalid CEMS data."

Response 5. The change was made inadvertently and the condition has been changed as shown below.

A.17. Plant-Wide NO_X Limit. Emissions of nitrogen oxides (NO_X) from the combined operation of Units 4, 5, 6, and 7 shall not exceed 0.2 lb/MMBtu heat input based on a 30-day rolling average. This limit shall apply when either Unit 6 or 7 is on-line. The plant-wide daily NO_X emission rate shall be determined by the following equation:

$$\text{Plant-Wide Daily MMBtu-Weighted } \mathbf{NO_X} \text{ Emission Rate} = \frac{\sum_{\text{Units 4, 5, 6, 7}} [(\text{Unit \# daily MMBtu}) \times (\text{Unit \# daily } NO_X \text{ CEMS Rate})]}{\sum_{\text{Units 4, 5, 6, 7}} (\text{Unit \# daily MMBtu})}$$

The "Unit # daily MMBtu" shall be determined by the daily as-burned fuel analysis and the fuel fired for each unit. The "Unit # daily NO_X CEMS Rate" shall be determined by the daily average of NO_X CEMS data for each unit and reported in terms of "lb/MMBtu heat input". The plant-wide daily NO_X emissions rate shall be determined each day regardless of the operating status for Units 6 or 7. The plant-wide 30-day rolling NO_X average shall be determined for each 30 sequential Unit 6 or 7 operating days, which need not be consecutive. A Unit 6 or 7 operating day means any calendar day that either Unit 6 or 7 operates a minimum of 18 hours. The Unit 6 or 7 daily NO_X CEMS rate may consist of less than 18 hours of data if this is due to: CEMS malfunction or invalid CEMS data. The plant-wide NO_X emission standard shall be achieved by utilizing the SCR systems for Units 6 and 7 and the SNCR systems for Units 4 and 5. [Paragraphs 2, 3 and Exhibit B of the Agreement; Permit Nos. 0330045-005-AC, 0330045-017-AC & 0330045-036-AC, Specific Condition 3]

Comment 6. Section IV. Acid Rain Part A.2. Please correct the "Each plan is effective for one calendar year for the years "2015, 2016, and 2017" "to 2016 only" and also "greater than (heat input) MMBTUs for each E.U. ID# 004, 005, 006 and 007".

Response 6. The corrections have been made as requested.

Comment 7. Section V. CAIR Part. Please delete the incorrect incorporation of the Acid Rain pages and replace with the original Section V. CAIR section (page 54 in 0330045-038-AV).

Response 7. The corrections have been made as requested.

III. Conclusion.

The enclosed proposed Title V air operation permit includes the aforementioned changes to the draft Title V air operation permit.

The permitting authority will issue the proposed permit No. 0330045-042-AV, with the changes noted above.