



# Florida Department of Environmental Protection

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

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Noah Valenstein  
Secretary

*(Sent by Electronic Mail – Return Receipt Requested)*

Mr. Richard Markey, Director of Environmental Affairs  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0328

Re: Title V Air Operation Permit Revision  
Permit No. 0330045-047-AV  
Crist Electric Generating Plant

Dear Mr. Markey:

One copy of the proposed permit determination for the revision of the Title V air operation permit for the Crist Electric Generating Plant located in Escambia County on Pate Road, off of 10 Mile Road on Governors Bayou, Pensacola, Florida, 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permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.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 David Lyle Read, P.E., at 850/717-90754, or by email at [David.Read@dep.state.fl.us](mailto:David.Read@dep.state.fl.us).

Sincerely,

*For:*

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

SA/dlr

Copies sent by electronic mail to the following:

Mr. Richard Markey, Gulf Power Company: [rmmarkey@southernco.com](mailto:rmmarkey@southernco.com)  
Mr. John Rampulla, Gulf Power Company: [jbrampul@southernco.com](mailto:jbrampul@southernco.com)  
Mr. C. Ryan Cowart, P.E., Gulf Power Company: [crcowart@southernco.com](mailto:crcowart@southernco.com)  
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Ms. Lynn Searce, DEP OPC: [lynn.searce@dep.state.fl.us](mailto:lynn.searce@dep.state.fl.us)  
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## NOTICE OF PROPOSED PERMIT

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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.

## PROPOSED PERMIT DETERMINATION

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Permit No. 0330045-047-AV

### I. Public Notice.

An Intent To Issue Air Permit issued to Gulf Power Company for the Crist Electric Generating Plant located in in Escambia County on Pate Road, off of 10 Mile Road on Governors Bayou, Pensacola, was clerked on August 15, 2017. The Public Notice Of Intent To Issue Air Permit was published in the Pensacola News Journal on August 30, 2017. 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 September 12, 2017.

### 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. Changes to the permit are highlighted in yellow with additions indicated by double underline text and deletions indicated by ~~strike through~~ text.

**Comment 1.** John Rampulla Email needs to be changed to [jbrampul@southernco.com](mailto:jbrampul@southernco.com).

**Response 1.** This correction will be made the proposed and final determination documents.

**Comment 2.** Page 15 of 65, **Specific Condition A.16**, "Plant wide NO<sub>x</sub> Limit": This was not included in the original revision request. Gulf no longer has CEMS on each unit. The daily NO<sub>x</sub> CEMS rate and CEMS MMBtu can be calculated at the CS1BYP, CS2BYP, and the FGD. Crist has certified Part 75 CEMS installed on all emissions stacks. Gulf would like to show plant wide NO<sub>x</sub> limit compliance utilizing the certified Part 75 CEMS systems.

**Response 2.** Since this request was not included in the original Title V revision application, it will not be made now. However, the Department would consider this request through another application requesting a Title V revision along with a concurrent air construction permit.

**Comment 3.** Page 22 of 65, **Specific Condition A.51**, "Notifications for Long-Term Scrubber Bypass": Gulf originally requested changing all this Condition including the title "Notification for Long-Term Scrubber Bypass." The condition is changed but the title not changed. Since this condition is no longer addressing "Notification," Gulf believes the title should be removed or changed to "Long Term Scrubber Bypass." This would make it clear that Gulf no longer would have any bypass notifications to the administrator.

**Response 3.** The Department agrees with this request and will make the change as shown below:

**A.51.** Long Term Scrubber Bypass ~~Notifications for Long Term Scrubber Bypass~~. [.....]

**Comment 4.** Page 26 of 65, **Specific Condition A.64**, "Subpart UUUUU Requirements": Gulf requested that all of this condition be removed from the permit because it pertained to MATS extension items and it also described the options to measure non-Hg HAP metals for PM, measure HCL, etc. The language left in is applicable, except that the wording is interpreted that Gulf is required to pay AOR fees on the pollutants listed in this condition. Gulf is selecting to show compliance using a PM monitor (40 CFR Appendix Table 2 to Subpart UUUUU of Part 63, Emission Limits for Existing EGUs) and utilize a scrubber (use SO<sub>2</sub> as a surrogate for HCL, 40 CFR Subpart UUUUU 63.9991, 40 CFR Appendix Table 2 to Subpart UUUUU of Part 63, Emission Limits for Existing EGUs). Gulf would recommend either removing all that language as requested or suggests adding clarifying language to the condition:

**Response 4.** The Department will add clarifying language to this condition as shown below:

**A.64.** Subpart UUUUU Requirements. In addition to the emissions limits shown above, the permittee shall also comply with the following emissions limits ~~by April 16, 2016. The permittee was granted a one year extension by the Department (see Appendix 40 CFR 63, Subpart UUUUU) to come into compliance with these emission limits. The original compliance date was April 16, 2015.~~

## NOTICE OF PROPOSED PERMIT

*{Permitting Note: On December 9, 2015, EPA approved an alternative sampling procedure and reporting requirements to the MATS rule for bypass operations when burning natural gas. The conditions authorized in EPA's approval letter (Appendix MATS) are incorporated by reference only in this Title V air operation permit.}*

- a. **Filterable Particulate Matter (PM).** Emissions of PM shall not exceed either 0.030 pound/million British thermal unit (lb/MMBtu) or 0.30 pound per megawatt-hour (lb/MWh). In lieu of the filterable PM emission limit, the permittee may select to meet a total non-Hg HAP metals emission limit of either  $5.0 \times 10^{-5}$  lb/MMBtu or 0.50 pounds per gigawatt-hour (lb/GWh). Finally, in lieu of either filterable PM or total non-Hg HAP metals emission limits the permittee may meet the following individual HAP metal emission limits:

- (1)Antimony (Sb) - 0.80 pounds per terra Btu (lb/TBtu) or  $8.0 \times 10^{-3}$  lb/GWh.
- (2)Arsenic (As) - 1.1 lb/TBtu or 0.020 lb/GWh.
- (3)Beryllium (Be) - 0.20 lb/TBtu or  $2.0 \times 10^{-3}$  lb/GWh.
- (4)Cadmium (Cd) - 0.30 lb/TBtu or  $3.0 \times 10^{-3}$  lb/GWh.
- (5)Chromium (Cr) - 2.8 lb/TBtu or 0.030 lb/GWh.
- (6)Cobalt (Co) - 0.80 lb/TBtu or  $8.0 \times 10^{-3}$  lb/GWh.
- (7)Lead (Pb) - 1.2 lb/TBtu or 0.020 lb/GWh.
- (8)Manganese (Mn) - 4.0 lb/TBtu or 0.050 lb/GWh.
- (9)Nickel (Ni) - 3.5 lb/TBtu or 0.040 lb/GWh.
- (10)Selenium (Se) - 5.0 lb/TBtu or 0.060 lb/GWh.

The permittee has chosen to show compliance with the Particulate Matter standard listed above using a Particulate Monitor CEMS as described in **Conditions A.17, A.25 and A.27** and shall not be required to meet the total non-Hg HAP metals emission limit or the individual HAP metal limits as listed above in a.(1)-(10) (40 CFR Appendix Table 2 to Subpart UUUUU of Part 63, Emission Limits for Existing EGUs).

- b. **Hydrogen Chloride (HCl).** Emissions of HCl shall not exceed either  $2.0 \times 10^{-3}$  lb/MMBtu or 0.020 lb/MWh. In lieu of HCl emission limit, the permittee may select to meet a SO<sub>2</sub> emission limit of either 0.20 lb/MMBtu or 1.5 lb/MWh 30-boiler operating day rolling average in the common FGD stack during normal operations.

The permittee has chosen to comply with the HCl standard listed above using by meeting the SO<sub>2</sub> emission limit as listed above using SO<sub>2</sub> CEMS as described in **Conditions A.25, A.26, and A.27** and shall not be required to meet HCl emission limit above (40 CFR Subpart UUUUU 63.9991, 40 CFR Appendix Table 2 to Subpart UUUUU of Part 63, Emission Limits for Existing EGUs).

- c. **Mercury (Hg).** Emissions of Hg shall not exceed either 1.2 lb/TBtu or 0.013 lb/GWh 30-boiler operating day rolling average in the common FGD stack during normal operations.

Compliance with the above emissions limits shall be demonstrated pursuant to one of the available options specified in 40 CFR 63, Subpart UUUUU (see attached Appendix 40 CFR 63, Subpart UUUUU, National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units). The permittee shall also comply with the recordkeeping and reporting requirements and all other applicable requirements specified Subpart UUUUU. [40 CFR 63 Subpart UUUUU and EPA approval letter dated December 9, 2015]

*{Permitting Note: Power output is on a gross basis for compliance with applicable emission limits. You may not use the alternate SO<sub>2</sub> emission limit in lieu of the HCl limit if your Electric Utility Steam Generating Unit does not have some form of FGD system and SO<sub>2</sub> CEMS installed.}*

### III. Conclusion.

The permitting authority will issue the proposed permit No.0330045-047-AV, with the changes noted above.