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1 Article Addressed to:

Mr. Robert W. Klemans, P.E.
 Electric Utility Environmental
 Engineer II
 Gainesville Regional Utilities
 POst Office Box 147117, Station
 A136
 Gainesville, Florida 32614-7117

2 Article Number
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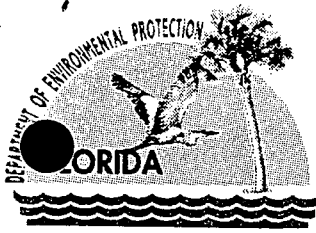
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BUREAU OF AIR REGULATION

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400





Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

April 23, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Robert W. Klemans, P.E.
Electric Utility Environmental Engineer II
Gainesville Regional Utilities
PO Box 147117, Station A136
Gainesville, FL 32614-7117

Re: Pulverizer Replacement at Deerhaven Unit No. 2
Gainesville Regional Utilities (GRU) Deerhaven (AIRS ID 0010006)

Dear Mr. Klemans:

The annual reports regarding the coal pulverizer replacement at Deerhaven Unit No. 2 in Spring 1999 have been reviewed. These reports were submitted as proof that the pulverizer replacement was not subject to the Prevention of Significant Deterioration (PSD) rules because the project did not result in an increase in "actual emissions," as defined for electric utility steam generating units at 62-212.200(11), F.A.C. The following questions need to be responded to in the next annual report:

- There are some significant discrepancies between the annual average heat input (MMBtu/yr) presented in the coal pulverizer project's annual reports and the heat inputs provided through the Annual Operating Reports (AOR). For example, at Unit No. 2 for calendar years 2001 and 2002, AOR data indicate an annual average of 14.6 trillion Btu (15.4 trillion Btu in 2001 and 13.8 trillion Btu in 2002, coal plus gas). The coal pulverizer project's annual reports are not based on calendar years, but present an estimate of 17.3 trillion Btu for Unit No. 2 from 3Q01 through 2Q02. For comparison, the heat input data reported to EPA's Acid Rain program show an annual average of 15.1 trillion Btu for Unit No. 2 over calendar years 2001 and 2002 (16.0 in 2001 and 14.2 in 2002). Please explain the discrepancies between the AOR and Acid Rain data versus the data presented in these reports. Provide monthly heat inputs for Unit No. 2 if necessary.
- The coal pulverizer project's reports cite changes in coal quality as a contributing cause to elevated emissions of nitrogen oxides (NO_x), sulfur dioxide (SO₂), and particulate matter (PM). Are the reported variations in ash and sulfur content typical of the coal fired at Deerhaven Unit No. 2? Was there a change in coal supplier between the baseline period and the years following the pulverizer replacement?
- What is the crushing capacity for the new Babcock and Wilcox MPS-75N pulverizers, in terms of lb/hr at a Hardgrove Grindability Index (HGI) of 50 (70%/200 mesh)? For

"More Protection, Less Process"

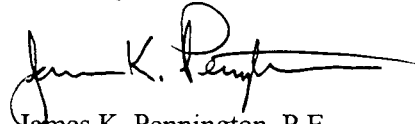
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reference, B&W literature states that their "G"-size model B&W-75 pulverizer can crush 90,000 lb/hr at the referenced hardness.

- Can the B&W-75 accept a coal with a higher hardness value than the old Riley Stoker pulverizer? What were typical hardness values during the baseline period and during the successive post-project operating years?
- Is the resultant ground coal from the B&W-75 finer than the ground coal from the Riley Stoker pulverizer?
- Were any adjustments made to the electrostatic precipitator (ESP) to take the new ash particle size distribution into account (assuming the different grinders produced different results)?
- What was the percent excess air typically used during the baseline period? Is that same excess air target still being used?
- What changes, if any, occurred to the combustion temperature following the coal pulverizer change out?
- Since the pulverizer replacement was performed during the first quarter of 1999 (1Q99), the baseline period should be the "two year period which precedes the particular date" (i.e., 1Q97 through 4Q98), unless the Department approves of an alternative period.
- The coal pulverizer project annual report for calendar year 2002 (which detailed the operation from "year 2" following the project) does not appear to be in our files. Please provide an additional copy of this report.

Please feel free to contact me at (850)921-9515 or Greg DeAngelo at (850)921-9506 with any questions about this request for additional information.

Sincerely,



James K. Pennington, P.E.
Administrator – Permitting North

JKP/gpd

cc: Scott Sheplak, Administrator – Compliance & Enforcement
Christopher Kirts, DEP Northeast District
Richard DuBose, EPA Region 4
Yolanta Jonynas, GRU