



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30308

JUL 16 1980

REF: 4AH-AF

Mr. Richard Breitmoser
Jacksonville Electric Authority
P. O. Box 53015
233 W. Duval Street
Jacksonville, Florida 32201

RECEIVED

JUL 21 1980

DEPT. OF
ENVIRONMENTAL REGULATION

Re: PSD Permit Application
PSD-FL-010

Dear Mr. Breitmoser:

EPA received on May 28, 1980 your latest application submittal for construction of two power generating units (600 MW) near the city of Jacksonville, Florida. Review of this application under the Federal Prevention of Significant Deterioration (PSD) Regulations (40 CFR 52.21) and the partial stay of these regulations published February 5, 1980 (45FR7800) has shown it to be complete for the purposes of determining increment rights. However, certain additional technical information is required to allow review of the application to continue.

Please submit information on the following items:

1. Explain the criteria and data sources used in selection of increment consuming sources included in your increment analyses. It is not clear that all increment consuming sources have been identified. In general, increment consuming sources are identified as follows:
 - a. The area of impact of the proposed project should be defined and shown on maps (circular area with radius equal to furthest distance at which proposed source has a significant impact).
 - b. An inventory of all major sources constructed since January 6, 1975 within the impact area of the proposed project, and all major sources within 50 km which could significantly impact the proposed source's impact area should be established.
 - c. An inventory of all minor sources constructed since August 7, 1977 within the impact area of the proposed project should be established.

- d. These sources should be considered in the Class II increment analysis. Although not all increment consuming sources need to be modeled, all should be considered for significance. Any arbitrary determination of insignificance should be justified.
- e. The Class I area increment analysis must consider all increment consuming sources within 100 km as your analysis has indicated. Minor sources beyond 50 km need not be modeled.

Two sources have been identified which may consume increment and effect the results of your Class I and Class II increment analyses. These areas are as follows:

Union Camp	Boiler (77 MM Btu/hr)	FDER Permit # AC 16-11888
ITT Rayonier	Sulfite Recovery Boiler	FDER permit # AC 45-2601

In addition, the SO₂ increment consuming emission rates for Container Corporation facilities are as follows:

Boiler 4 & 5 50.8 g/s Recovery Boiler 35.3 g/s

Reevaluating previous increment consumption may require additional increment analysis.

2. Additional air quality analysis is required to demonstrate protection of the NAAQS. The "background" concentrations developed in your application through analysis of 95th percentile concentrations at monitors not located near major sources is unacceptable. Given the large number of sources in the Jacksonville urban area, the quantity of existing monitoring data and the small number of sources outside the Jacksonville urban area, the most appropriate analysis technique likely is to establish urban "background" from highest or highest, second highest monitoring data and model outlying sources along with the proposed new source to estimate maximum interaction impacts.
3. Copies of input and output to pertinent computer runs.
4. The technical basis for the conclusion that CO emissions impacts are insignificant (i.e. through comparison with TSP modeling results from the boilers considering a ratio of CO to TSP emission rates or by what other means).

5. Did the 3-hour and 24-hour maximums and highest, second highest concentration during the 5 years of meteorological data screened by CRSTER (multisource) occur in the "worst" year selected for use in the remaining analysis?
6. Parameters used to calculate HC emissions from storage tanks, which serve as the basis for your assumption of negligible source emissions. Example parameters are tank capacity, roof type, number of turnovers expected, fuel vapor pressure, type of control technology, etc.
7. Design parameters proposed as BACT for NO_x and CO from the main boilers, and SO₂, CO, TSP and NO_x from the auxiliary boiler.
8. The basis for compliance with minimum GEP stack height.

EPA met with your consultant, Environsphere, on July 9, 1980 and they submitted the information requested on items 1, 3, 4, 5, 6, 8 and submitted partial information on item 7. You are encouraged to submit the remaining information on items 2 and 7 as soon as possible. Please also be aware that the United States Court of Appeals for the DC Circuit has issued a ruling in the case of Alabama Power Co. vs. Douglas M. Costle (78-1006 and consolidated cases) which will have significant impacts on the EPA Prevention of Significant Deterioration (PSD) program. You are advised that review requirements of your application may be subject to reevaluation as a result of the final court decision and its ultimate effect. In addition, EPA has issued a "partial stay" of regulations (published February 5, 1980, 45 FR 7800) affecting applicability of sources proposed for construction prior to affecting applicability of sources proposed for construction prior to promulgation of the final PSD regulations. Your application has been reviewed under the provisions of the Stay and the proposed source remains subject to PSD review.

Sincerely yours,

Tommie A. Gibbs

Tommie A. Gibbs
Chief
Air Facilities Branch

cc: FL DER