

## INTEROFFICE MEMORANDUM

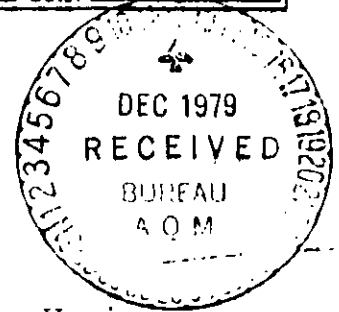
For Routing To District Offices And/Or To Other Than The Addressee	
To: <i>Steve Smallwood</i>	Loctn.: <i>RM 612</i>
To: _____	Loctn.: _____
To: _____	Loctn.: _____
From: _____	Date: _____

TO: Steve Smallwood

FROM: Mary F. Clark *MJC*  
Assistant General Counsel

DATE: December 11, 1979

SUBJECT: Jacksonville Electric Authority Petition for Variance



On November 20, 1979, the Department received a petition from Jacksonville Electric Authority for a two year variance from certain requirements of 17-2.05. Specifically, JEA has requested authority to burn 1.5 percent sulfur fuel at certain Kennedy and Southside generating units and to be allowed 40 percent opacity at the Northside units. A hearing on this petition has tentatively been scheduled for January 15, 1980, in Jacksonville. As we have only 30 days, approximately, to evaluate the petition it is important that the Bureau begin its evaluation immediately. I will be working with our oil consultant on an evaluation of the sulfur oil availability. However, I need Bureau input on the following issues:

1. Impact on ambient air quality standards and PSD increments (Larry should review the modeling that was done prior to the 110f variance proceedings).
2. A thorough review of JEA's proposed stack modification plans.
3. An analysis of other control technologies available to JEA to control SO<sub>2</sub> emissions.
4. A review of the air alert plan proposed by JEA during the 110f variance hearings.
5. A list of proposed conditions to be imposed on JEA in the variance.
6. A recommendation as to whether or not the variance should be granted.