# Memorandum

# Florida Department of Environmental Protection

TO:

Joe Kahn, Director, Division of Air Resource Management

THROUGH:

Trina Vielhauer, Chief, Bureau of Air Regulation

THROUGH:

Syed Arif, New Source Review Section SA

FROM:

Bruce Mitchell, New Source Review Section

DATE:

November 18, 2008

SUBJECT:

Final Air Construction Permit Revision No. PSD-FL-010H

Project No. 0310045-024-AC JEA – St. Johns River Power Park

Pulverized Coal-Fired Boilers Nos. 1 and 2

Addition of Natural Gas Igniters for Startup, Shutdown, Flame Stabilization and Low Load Operation; and Allow the Use of No. 2 Fuel Oil for Flame Stabilization and

Shutdown (Already Allowed for Startup and Low Load Operation)

The Final Permit for this project is attached for your approval and signature, which authorizes the installation of natural gas igniters for startup, shutdown, flame stabilization and low load operation on the existing pulverized coal and petroleum coke fired Boilers Nos. 1 and 2; and it authorizes the use of the No. 2 fuel oil (FO) for flame stabilization and shutdown (already authorized to use No. 2 FO for startup and low load operation in Power Plant Siting Permit No. PA81-13). The proposed work will be conducted at the existing JEA St. Johns River Power Park facility, which is located in Duval County, Florida. The project results in a minor source air construction permit.

The Department distributed an "Intent to Issue Permit" package on October 27, 2008. The applicant published the "Public Notice of Intent to Issue" in The Florida Times-Union on October 31, 2008. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed. Timely comments were received from the applicant and are addressed in the Final Determination; and, the comments are considered to be insignificant.

I recommend your approval of the attached Final Permit for this project.

Attachments

#### **PERMITTEE**

JEA 21 West Church Street Jacksonville, Florida 32202-3139

#### PERMITTING AUTHORITY

Florida Department of Environmental Protection Division of Air Resource Management Bureau of Air Regulation, Air Permitting North Section 2600 Blair Stone Road, MS #5505 Tallahassee, Florida 32399-2400

#### **PROJECT**

Air Permit No. PSD-FL-010H Project No. 0310045-024-AC St. Johns River Power Park

This project authorizes the installation of natural gas igniters for startup, shutdown, flame stabilization and low load operation on the existing pulverized coal and petroleum coke fired Boilers Nos. 1 and 2; and it authorizes the use of the No. 2 fuel oil (FO) for flame stabilization and shutdown (already authorized to use No. 2 FO for startup and low load operation in Power Plant Siting Permit No. PA81-13). The proposed work will be conducted at the existing JEA St. Johns River Power Park facility, which is located in Duval County, Florida. The project results in a minor source air construction permit.

#### NOTICE AND PUBLICATION

The Department distributed an Intent to Issue Permit package on October 27, 2008. The applicant published the Public Notice of Intent to Issue in the <u>The Florida Times-Union</u> on October 31, 2008. The Department received the proof of publication on November 5, 2008. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed.

#### **COMMENTS**

## **Applicant**

On November 4, 2008, the Department received timely comments on the Draft Permit Revision from the applicant via an e-mail received November 4, 2008. The following summarizes the comments and the Department's response.

1. In "new" Specific Condition V.11. of the permit for Boilers Nos. 1 and 2, it was requested that an introductory phrase be added to recognize that supplemental fuel for startup, shutdown, flame stabilization and low load operation be used only if it is needed and that pulverized petroleum coke is also an authorized fuel along with pulverized coal.

Response: The clarification and revision better describes what was intended. The Department agrees with the request and the changes were made.

#### **CONCLUSION**

The final action of the Department is to issue the permit with the minor revision and clarification as described above.

# STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

#### NOTICE OF PERMIT REVISION

In the Matter of an Application for Permit Revision by:

JEA 21 West Church Street Jacksonville, Florida 32202

Authorized Representative:

Mr. Michael J. Brost, Vice President - Electric System

Air Permit No. PSD-FL-010H
Project No. 0310045-024-AC
St. Johns River Power Park
Add Natural Gas Igniters on the Pulverized Coal
and Petroleum Coke-Fired Boilers Nos. 1 and 2

JEA operates the existing St. Johns River Power Park located at 11201 New Berlin Road in Jacksonville, Duval County, Florida. The facility is an electric utility. This final air construction permit revision authorizes the installation and operation of natural gas igniters for startup, shutdown, low load operation and flame stabilization, on the pulverized coal and petroleum coke-fired Boilers Nos. 1 and 2. In addition, the applicant is also authorized to use the existing No. 2 distillate fuel oil igniters for flame stabilization and shutdown on Boilers Nos. 1 and 2 [the existing No. 2 distillate fuel oil igniters are already authorized to be used for startup and low load operation (PA81-13)]. The original air construction permit No. PSD-FL-010, required that the auxiliary boiler fire No. 2 fuel oil while providing startup and shutdown capability for Boilers Nos. 1 and 2. A copy of this Notice of Permit Revision shall be filed with the referenced permit and shall become part of the permit. This permit revision is issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

Joseph Kábn! Ďirector

Division of Air Resource Management

JK/tlv/sa/bm

#### **CERTIFICATE OF SERVICE**

- Mr. Michael J. Brost, JEA (brosmj@jea.com)
- Mr. John A. Worley, JEA (worlja@jea.com)
- Mr. Kennard F. Kosky, Golder Associates, Inc. (kkosky@golder.com)
- Mr. Richard Robinson, Duval County Environmental Quality Division (robinson@coj.net)
- Ms. Kathleen Forney, U.S. EPA, Region 4 (forney.kathleen@epamail.epa.gov)
- Ms. Heather Abrams, U.S. EPA Region 4 (abrams.heather@epamail.epa.gov)
- Ms. Catherine Collins, Fish and Wildlife Service (catherine collins@fws.gov)
- Mr. Mike Halpin, DEP-Siting Coordination Office (mike.halpin@dep.state.fl.us)
- Ms. Vickie Gibson, DEP-BAR (victoria.gibson@dep.state.fl.us) (for read file)

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.

#### FINAL PERMIT REVISION

## This permit revision modifies original Permit No. PSD-FL-010.

For pulverized coal-fired Boilers Nos. 1 and 2, the following permit revision (new specific condition) incorporates the authorization to use No. 2 fuel oil for startup and low load operation from the original Power Plant Siting Permit No. PA81-13. The new specific condition also recognizes the requirement that No. 2 fuel oil be used during startup and shutdown of the boilers, as was imposed on the auxiliary boiler in the original air construction permit No. PSD-FL-010. New text is marked with double underline.

#### PSD-FL-010: New Specific Condition. V.11.

V.11. If at any time the permittee determines that it is appropriate to use supplemental fuel during periods of startup, shutdown, flame stabilization and low load operation, then No. 2 fuel oil and/or natural gas shall be used for the pulverized coal and petroleum coke-fired Boiler No. 1 or Boiler No. 2.

From:

Livingston, Sylvia

Sent: To: Monday, November 24, 2008 3:38 PM

10.

'brosmj@jea.com'; 'worlja@jea.com'

Cc:

'kkosky@golder.com'; 'robinson@coj.net'; 'forney.kathleen@epamail.epa.gov'; 'abrams.heather@epamail.epa.gov'; 'catherine\_collins@fws.gov'; Halpin, Mike; Gibson,

Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR); Arif, Syed

Subject:

JEA - NORTHSIDE/SJRPP; 0310045-024-AC (PSD-FL-010H)

#### Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". **We must receive verification that you are able to access the documents.** Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

# Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\_permit\_zip\_files/0310045.024.AC.F\_pdf.zip

Owner/Company Name: JEA

Facility Name: NORTHSIDE/SJRPP

Project Number: 0310045-024-AC/ PSD-FL-010H

Permit Status: FINAL

Permit Activity: CONSTRUCTION/ NATURAL GAS IGNITERS

Facility County: DUVAL Processor: Bruce Mitchell

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <a href="http://www.dep.state.fl.us/air/eproducts/apds/default.asp">http://www.dep.state.fl.us/air/eproducts/apds/default.asp</a>.

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.



Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

From: Brost, Mike J. - VP, Electric Systems [BrosMJ@jea.com]

Sent: Tuesday, November 25, 2008 9:39 AM

To: Livingston, Sylvia

Subject: RE: JEA - NORTHSIDE/SJRPP; 0310045-024-AC (PSD-FL-010H)

Received. Mike Brost

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]

Sent: Monday, November 24, 2008 3:38 PM

To: Brost, Mike J. - VP, Electric Systems; Worley, Jay A. - Director, Environmental Programs

**Cc:** kkosky@golder.com; robinson@coj.net; forney.kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; catherine\_collins@fws.gov; Halpin, Mike; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR); Arif, Syed

Subject: JEA - NORTHSIDE/SJRPP; 0310045-024-AC (PSD-FL-010H)

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<<0310045-024-AC\_Notice.pdf>>

Sylvia Livingston Bureau of Air Regulation Division of Air Resource Management (DARM) 850/921-9506

Cc:

From: Worley, Jay A. - Director, Environmental Programs [WorlJA@jea.com]

Sent: Monday, November 24, 2008 3:58 PM

To: Livingston, Sylvia; Brost, Mike J. - VP, Electric Systems

kkosky@golder.com; robinson@coj.net; forney.kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov;

catherine\_collins@fws.gov; Halpin, Mike; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR); Arif, Syed

Subject: RE: JEA - NORTHSIDE/SJRPP; 0310045-024-AC (PSD-FL-010H)

Sylvia, Please note that I have received. Thanks, Jay

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]

Sent: Monday, November 24, 2008 3:38 PM

To: Brost, Mike J. - VP, Electric Systems; Worley, Jay A. - Director, Environmental Programs

**Cc:** kkosky@golder.com; robinson@coj.net; forney.kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; catherine\_collins@fws.gov; Halpin, Mike; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR); Arif, Syed

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<<0310045-024-AC\_Notice.pdf>>

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)

From: Robinson, Richard [ROBINSON@coj.net] Sent: Monday, November 24, 2008 4:08 PM

To: Livingston, Sylvia

Subject: RE: JEA - NORTHSIDE/SJRPP; 0310045-024-AC (PSD-FL-010H)

Sylvia,

I was able to view the documents in the e-mail link below.

Thanks,

Richard

Richard L. Robinson, P.E. **Environmental Engineering Manager** Air Quality Branch **Environmental Quality Division Environmental and Compliance Department** City of Jacksonville, Florida 117 West Duval Street, Suite 225 Jacksonville, FL 32202

Phone: (904) 630-4900 Fax: (904) 630-3638 E-Mail: robinson@coj.net

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Please consider the environment before printing this email.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]

Sent: Monday, November 24, 2008 3:38 PM To: brosmi@iea.com; worlia@iea.com

Cc: kkosky@golder.com; Robinson, Richard; forney.kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; catherine\_collins@fws.gov; Halpin, Mike; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR); Arif, Syed

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