

# **Northside Repowering Project**

**Circulating Fluidized Bed  
Combustion Technology**

**Volume 1**

**February 1999**

21 West Church Street  
Jacksonville, Florida 32202-3139

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MAY 06 1999

**BUREAU OF  
AIR REGULATION**

May 3, 1999



Clair H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Note book  
on  
shelf

RE: Request to Revise SJRPP's PSD Permit No. PSD-FL-010  
Regarding Materials Handling Operations Update

Dear Mr. Fancy:

Representatives from JEA (formerly the Jacksonville Electric Authority) have previously met with Syed Arif of the Department of Environmental Protection's Bureau of Air Regulation to discuss potential revisions to the above-referenced Prevention of Significant Deterioration (PSD) permit for the St. Johns River Power Park (SJRPP) regarding existing materials handling operations at SJRPP. As has been discussed, during preparation of the PSD permit application for the *proposed* Northside Units 1 and 2 Repowering Project, JEA discovered that the list of emission points associated with existing materials handling operations in Tables 2 and 6 of SJRPP's current PSD permit was not comprehensive and that the throughput rates which had been provided did not reflect daily or annual maximum potential rates.

The air permit application which is enclosed for filing with the Department (original and three copies) addresses the existing materials handling operations at SJRPP and fully updates the PSD permit by providing a comprehensive and complete inventory of emission points and the maximum potential throughput rates. This updated information on the existing operations was relied upon in the development of the PSD permit application filed with the Department for the *proposed* Northside Repowering Project on February 15, 1999. As part of that application, JEA requested a revision to SJRPP's PSD permit to address the delivery, storage, and transfer of additional solid fuel and limestone at SJRPP to support the proposed Northside Repowering Project.

While PSD review does not apply to the enclosed application regarding existing materials handling operations, JEA conducted ambient air quality modeling as part of the PSD permit application for the Northside Repowering Project, which

**BEST AVAILABLE COPY**

**WAIVER OF 90 DAY TIME LIMIT  
UNDER SECTIONS 120.60(1), (3) AND 403.0876, FLORIDA STATUTES**

License (Permit, Certification) Application to Revise Permit No. PSD-FL-010(C), St. Johns River Power Park, Submitted February 15, 1999


Applicant's Name: JEA  
21 West Church Street  
Jacksonville, FL 32202

With regard to the above referenced application for permit revision, the applicant hereby with full knowledge and understanding of applicant's rights under Sections 120.60(1), (3) and 403.0876, Florida Statutes, waives the right to have the application finally approved or denied by the State of Florida Department of Environmental Protection within the 90 day time period prescribed by law. Representatives of the Department have stated that the "proposed" action to issue or deny the requested permit (Intent, Public Notice of Intent, and Proposed Permit Revision) shall occur 16 days prior to the 90<sup>th</sup> day. Said waiver is made freely and voluntarily by the applicant, with full knowledge, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Protection.

This waiver for final issuance or denial of the requested permit revision shall expire on the 2nd day of July, 1999, and is made with the assumption that the Department's proposal to issue or deny the permit revision will be made by June 16, 1999 (Intent, Public Notice of Intent, and Proposed Permit). This waiver does not apply to an Application to Revise and Update Permit No. PSD-FL-010(C) for St. Johns River Power Park that was filed by JEA with the Department on May 6, 1999. The Department would have 90 days from the date that application is considered complete to issue or deny a final permit revision based on that request.

The undersigned is authorized to make this waiver on behalf of the applicant.

Dated: May 27, 1999

  
Signature

Walter P. Bussells, Managing Director  
and Chief Executive Officer of JEA

cc: ✓ Syed Arif, DEP  
Scott Goorland, Esq., DEP  
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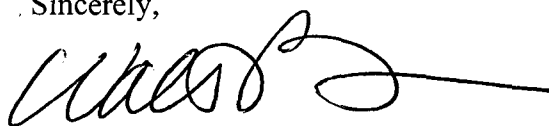
Clair H. Fancy, P.E.  
Department of Environmental Protection  
May 3, 1999  
Page 2 of 2

demonstrates that the maximum potential air emissions from the materials handling systems at SJRPP will not cause or contribute to a violation of any ambient air quality standards or PSD increments.

While PSD review does not apply to the enclosed application regarding existing materials handling operations, JEA conducted ambient air quality modeling as part of the PSD permit application for the Northside Repowering Project, which demonstrates that the maximum potential air emissions from the materials handling systems at SJRPP will not cause or contribute to a violation of any ambient air quality standards or PSD increments.

JEA would like to coordinate the revisions being requested to the SJRPP PSD permit in both this submittal and in the February 15, 1999 submittal. We would like to discuss this with you or members of your staff as soon as possible, and a JEA representative will be calling soon to schedule an appointment. Should you have any questions or require additional information in the meantime, please don't hesitate to call Bert Gianazza with JEA at 904-665-6247.

Sincerely,



Walter P. Bussells  
Managing Director & Chief Executive Officer

Enclosures

cc: Syed Arif, DEP, BAR  
Cleve Holladay, DEP, BAR  
Hamilton S. Oven, Jr., DEP Siting  
Scott Goorland, Esquire, DEP OGC  
Rita Felton-Smith, DEP NE District  
Robert S. Pace, RESD  
Gregg Worley, EPA Region IV  
Ellen Porter, USFWS