



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 10 1999

RECEIVED

FEB 17 1999

BUREAU OF
AIR REGULATION

4APT-ARB

Mr. A. A. Linero, P.E.
Administrator
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJECT: Request for Approval of a Custom Fuel Monitoring Schedule for Jacksonville
Electric Authority (JEA)

0310047-002-AC

Dear Mr. Linero:

Thank you for your letter dated February 2, 1999, regarding the use of a custom fuel monitoring schedule for Jacksonville Electric Authority (JEA). JEA will operate a natural gas fired simple cycle combustion turbine subject to 40 C.F.R. Part 60, Subpart GG - Standards of Performance for Stationary Gas Turbines. As requested, Specific Conditions 37-39, 41 and 42 have been reviewed. The Environmental Protection Agency (EPA), Region 4 has concluded that the use of acid rain NO_x continuous emission monitoring system (CEMS) for demonstrating compliance, as described in Specific Conditions 37-39, is acceptable. Region 4 has also concluded that the custom fuel monitoring schedule proposed in Specific Condition 41 and the fuel oil monitoring schedule described in Specific Condition 42 are both acceptable.

According to 40 C.F.R. 60.334(b)(2), owners and operators of stationary gas turbines subject to Subpart GG are required to monitor fuel nitrogen and sulfur content on a daily basis if a company does not have intermediate bulk storage for its fuel. 40 C.F.R. 60.334(b)(2) also contains provisions allowing owners and operators of turbines that do not have intermediate bulk storage for their fuel to request approval of custom fuel monitoring schedules that require less frequent monitoring of fuel nitrogen and sulfur content.

Region 4 reviewed Specific Condition 41, which allows SO_2 emissions to be quantified using procedures in 40 C.F.R. 75 Appendix D in lieu of daily sampling as required by 40 C.F.R. 60.334(b). Since the specific limitations listed in the permit condition are consistent with previous determinations, we have concluded that the use of this custom fuel monitoring schedule is acceptable.

Specific Conditions 37-39 involve the method used to monitor nitrogen oxides (NO_x) excess emissions. Under the provisions for 40 C.F.R. 60.334(c)(1), the operating parameters used to identify NO_x excess emissions for Subpart GG turbines are water-to-fuel injection rates

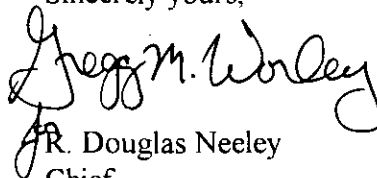
and fuel nitrogen content. As an alternative to monitoring NO_x excess emissions using these parameters, JEA is proposing to use a NO_x CEMS that is certified for measuring NO_x emissions under 40 C.F.R. Part 75. Based upon a determination issued by EPA on March 12, 1993, NO_x CEMS can be used to monitor excess emissions from Subpart GG turbines if a number of conditions specified in the determination are met and included in the permit condition.

Specific Conditions 38 and 39 address the potential for correcting results to ISO standard day conditions. The basis for this requirement is that, under the provisions of 40 C.F.R. 60.335(c), NO_x results from performance tests must be converted to ISO standard day conditions. As an alternative to continuously correcting results to ISO standard day conditions, JEA plans to keep records of the data needed to make this conversion, so that NO_x results could be calculated on an ISO standard day condition basis anytime at the request of EPA or the Florida DEP. This approach is acceptable, since the construction permit contains NO_x limits that are more stringent than those in Subpart GG, and compliance with Subpart GG for these units would be a concern only in cases when a turbine is in violation of the NO_x limits in its permit.

Finally, Specific Condition 42 addresses the monitoring schedule for fuel oil. According to 40 C.F.R. 60.334(b)(1), the nitrogen and sulfur content of the fuel oil must be monitored each time a new shipment of fuel oil is transferred to bulk storage. JEA is proposing to use the fuel analysis provided by the fuel vendor instead of sampling each shipment directly. This approach is acceptable, since the specific condition states that the fuel vendor's analyses will comply with the test method requirements of 40 C.F.R. 60.335(d).

If you have any questions regarding the determination provided in this letter, please call Katy Forney of my staff at 404-562-9130.

Sincerely yours,



R. Douglas Neeley
Chief

Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

cc: J. Newton, BAR
NED
Duval Co
NPS

Boeppel
904/818-6247

Bert Gianazza
February 3, 1999
Page 1

MEMORANDUM

February 17, 1999

TO: Teresa Heron, FDEP
FROM: Bert Gianazza, JEA
RE: Comments on Draft Construction Permit for Kennedy CT

Below please find our comments regarding the Draft Permit for the Kennedy Generating Station Simple Cycle Combustion Turbine. If you have any questions with regard to this matter, please advise.

1. Section III, Condition 17. NO_x Emissions. Since this unit will be required to comply with a 15 ppm NO_x limit (42 ppm on oil) as well as a ton per year limit, we request that the lb/hr limit be removed. Also, the total annual NO_x emission limit of 200 tons per year should be on a 12-month rolling average basis. Also, to preserve JEA's option to use the protocol under 40 CFR Appendix E for the determination of compliance with the NO_x limits, please add the following language to the end of Condition 17 and 27: "In lieu of utilizing CEMs for NO_x, the permittee may elect to utilize the protocol specified under 40 CFR Part 75, Appendix E."
2. Condition 18. Visible Emissions. This condition should clarify that the VE limit while burning oil is 20% opacity in accordance with FAC 296.320(4)(b)1 and the limit on gas is 10%.
3. Condition 19. We request that the pound per hour limit on CO be removed and a tons per year limit of 97.2 be added to assure avoidance of PSD for CO.
4. Condition 21. We request that the pound per hour limits for SO₂ be removed since natural gas is the primary fuel and there is a limit of 0.05% on the sulfur content of the fuel oil. Accordingly, there should be no need for an initial compliance test. Also, four lines up from the bottom, the following edit should be made: "Confirmation by the Custom Fuel Monitoring Schedule ~~that than~~ . . ."
5. Condition 28. DEP's citation to Rule 62-297.340, F.A.C. is incorrect because this rule has been repealed. It is not clear what state rule requirement DEP is varying when the permit states "Notwithstanding the requirement of _____."

Bert Gianazza
February 3, 1999
Page 2

6. Condition 36. This condition is redundant to Condition 34 and therefore these two conditions should be consolidated for clarity.

7. Condition 37, line 4. In order to clarify that the excess emissions condition applies to NO_x, please reference condition 22.

8. Condition 39. This Condition is nearly identical to Condition 38 and therefore these two conditions should be consolidated for clarity.

9. Condition 41. In the third bullet, what is meant by the statement that the methods should be "certified" by EPA?

INTEROFFICE MEMORANDUM

Date: 12-Feb-1999 05:08pm
From: Oracle Notifier TAL
ORACLE_NOTIFIER@A1@DER
Dept: Send Oracle Notifications ONLY
Tel No:

Subject: OGC ACTION - Clock Stopped

The Office of General Counsel has initiated the following case:

Case Number: 99-0251
Style: JACKSONVILLE ELECTRIC AUTHORITY (KENNEDY GEN. STAT.) V DEP

The following permit application has been locked from further updates until the case is resolved:

Permit Application: 0310047-002-AC
Application: ARMS
Program Area: AIR CFC PROGRAM
District: NORTHEAST

The lead attorney for this case is JEFFREY E BROWN

This notification should be e-mailed to:

Permit Processor: heron_t
Lead Attorney: BROWN_J

21 West Church Street
Jacksonville, Florida 32202-3139



RECEIVED
FEB 11 1999
BUREAU OF
AIR REGULATION

February 10, 1999

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

Subject: Kennedy Generating Station Simple Cycle Combustion Turbine

Dear Mr. Fancy:

Attached please find proof of publication, in the form of a newspaper affidavit, of the "PUBLIC NOTICE OF INTENT TO ISSUE" for the subject project.

If you have any questions with regard to this matter, please do not hesitate to call me at (904) 665-6247.

Sincerely,

A handwritten signature in cursive script, appearing to read 'N. Bert Gianazza'.

N. Bert Gianazza, P.E.
Environmental, Health & Safety Group

NBG

KGST2

Enclosure

cc: Steve Pace, RESD

T. Nelson
NED
Duval
EPA
NPS

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP file No. 0310047-002-AC
Jacksonville Electric Authority Kennedy Generating Station
170 Megawatt Combustion Turbine-Electrical Generator
Duval County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Jacksonville Electric Authority (JEA). The permit is to install a nominal 170 megawatt natural gas and No. 2 fuel oil combustion turbine-electrical generator to replace a natural gas and fuel oil-fired steam electrical unit (KE10) at the Kennedy Generating Station in Jacksonville, Duval County, Florida.

The proposed unit is a nominal 170 megawatt General Electric PG7241FA gas and No. 2 fuel oil-fired combustion turbine-electrical generator and a 90 foot stack. The unit will operate a maximum of 4050 hours on natural gas or 1260 hours on No. 2 fuel oil with a maximum sulfur content of 0.05%.

NOx emissions while firing natural gas, will be controlled by Dry Low NOx (DLN-2.6) combustors tuned to achieve emissions of 15 parts per million (ppm) by volume at 15 percent oxygen. During oil firing, NOx emissions will be 42 ppm and controlled by wet injection. Emissions of carbon monoxide (CO) for gas and oil firing will be controlled to 15 and 20 ppm, respectively.

The proven capabilities of the selected unit, together with the operational restrictions, will ensure that the annual emission levels required to avoid PSD Review are obtained. There will be very small decreases in regulated air pollutants. However, the unit will be able to produce substantially more electrical energy while maintaining maximum total annual emissions near post levels.

Table with 5 columns: Pollutants, KE10 Actual Emissions, CT Potential Emissions, Change, PSD Significant Levels. Rows include PM/PM10, SAM, SO2, NOx, VOC, and CO.

An air quality impact analysis was not required or conducted. No significant impacts are due as a result of this project.

The Department will issue the FINAL permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400.

The JEA Kennedy Generating Station combustion turbine-electrical generator project is not subject to review under Section 403.506 F.S. (Power Plant Siting Act), because it provides for no expansion in steam generating capacity.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; and (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the applicant have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection, Bureau of Air Regulation, 111 S. Magnolia Drive, Suite 4, Tallahassee, Florida, 32301. Telephone: 850/488-0114, Fax: 850/922-6779.

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Sections 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

FLORIDA PUBLISHING COMPANY
Publisher
JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA
COUNTY OF DUVAL

Before the undersigned authority personally appeared

Steven L. Smith who on oath says that he is

Legal Advertising Representative of The Florida Times-Union,

a daily newspaper published at Jacksonville in Duval County, Florida; that the attached copy of advertisement, being a Legal Advertisement

in the matter of Public Notice of Intent to Issue

in the Court,

was published in THE FLORIDA TIMES-UNION in the issues of

February 4, 1999

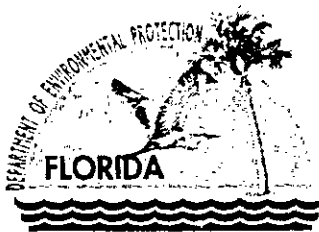
Affiant further says that the said The Florida Times-Union is a newspaper published at Jacksonville, in said Duval County, Florida, and that the said newspaper has heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me
this 5th day of

February, A.D. 19 99

Notary Public State of Florida at Large
My Commission Expires 01, 2001

Notary Public State of Florida at Large
My Commission Expires 01, 2001
DALE M. ... ATLANTA BUSINESS CO. IN



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

February 2, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. R. Douglas Neeley, Chief
Air, Radiation Technology Branch
US EPA Region IV
61 Forsyth Street
Atlanta, GA 30303

Re: Review and Custom Fuel Monitoring Schedule
Jacksonville Electric Authority (JEA)
DEP FILE No. 0310047-002-AC

Dear Mr. Neeley:

Enclosed is a copy of the Department's draft permit to construct (the Department's Intent to Issue package was already mailed to Mr. Greg Worley) a 170 MW Combustion Turbine at the JEA facility in Duval County. It will be a 4050 hr/yr natural gas-fired simple cycle peaking unit with limited use of maximum 0.05 percent sulfur fuel oil (1260 hours /yr).

The project was not subject to PSD review.

Please send your written comments on or approval of the applicant's proposed custom fuel monitoring schedule. The plan is based on the letter dated January 16, 1996 from Region V to Dayton Power and Light. The Subpart GG limit on SO₂ emissions is 150 ppbvd @ 15% O₂ or a fuel sulfur limit of 0.8% sulfur. Neither of these limits could conceivably be violated by the use of pipeline quality natural gas which has a maximum SO₂ emission rate of 0.0006 lb/MMBtu (40 CFR 75 Appendix D Section 2.3.1.4). The sulfur content of pipeline quality natural gas in Florida has been estimated at a maximum of 0.003 % sulfur. Fuel oil will with a 0.05% sulfur content be used. The requirements have been incorporated into the enclosed draft permit as Specific Conditions 41 and 42 and read as follows:

Natural Gas Monitoring Schedule: A custom fuel monitoring schedule pursuant to 40 CFR 75 Appendix D for natural gas may be used in lieu of the daily sampling requirements of 40 CFR 60.334 (b)(2) provided the following requirements are met:

- The permittee shall apply for an Acid Rain permit within the deadlines specified in 40 CFR 72.30.
- The permittee shall submit a monitoring plan, certified by signature of the Designated Representative, that commits to using a primary fuel of pipeline supplied natural gas (sulfur content less than 20 gr/100 scf pursuant to 40 CFR 75.11(d)(2)).

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

- Each unit shall be monitored for SO₂ emissions using methods consistent with the requirements of 40 CFR 75 and certified by the USEPA.

This custom fuel monitoring schedule will only be valid when pipeline natural gas is used as a primary fuel. If the primary fuel for these units is changed to a higher sulfur fuel, SO₂ emissions must be accounted for as required pursuant to 40 CFR 75.11(d).

Fuel Oil Monitoring Schedule: The following monitoring schedule for No. 2 or superior grade fuel oil shall be followed: For all bulk shipments of No. 2 fuel oil received at this facility an analysis which reports the sulfur content and nitrogen content of the fuel shall be provided by the fuel vendor. The analysis shall also specify the methods by which the analyses were conducted and shall comply with the requirements of 40 CFR 60.335(d).

Please comment on Specific Conditions 37-39 which allow the use of the acid rain NO_x CEMS for demonstrating compliance as well as reporting excess emissions. Allowable NO_x emissions for this project shall not exceed 15 ppmvd @15% O₂ (gas) and 42 ppmvd @15% O₂ (oil) which are substantially lower than the applicable Subpart GG limit based on the efficiency of the unit. A CEMS requirement is stricter and more accurate than any Subpart GG requirement for determining excess emissions.

The Department recommends your approval of the custom fuel monitoring schedules and these NO_x monitoring provisions. We also request your comments on the Intent to Issue. If you have any questions on these matters please contact Teresa Heron at 850/921-9529.

Sincerely,



A. A. Linero, P.E., Administrator
New Source Review Section

AAL/aal

Enclosures

PERMITTEE:

Jacksonville Electric Authority
Kennedy Generating Station
21 West Church Street
Jacksonville, Florida 32202-3139

Permit No.	0310047-002-AC
Project:	170 MW Simple Cycle Peaking Unit
SIC No.	4911
Expires:	December 31, 2002

Authorized Representative:

Walter P. Bussels
Managing Director & Chief Executive Officer

PROJECT AND LOCATION:

Jacksonville Electric Authority (JEA) proposes to install one (1) natural gas/fuel-fired simple cycle unit that will consist of a nominal 170 MW (at 59°F) combustion turbine-generator equipped with Dry Low NO_x (DLN-2.6) combustors. The CT proposed is a General Electric PG 7241 FA and will be used as a peaking unit. This turbine will replace one existing natural gas/fuel oil-fired boiler identified by JEA as KE10 (ARMS Emission Unit 009) at the Kennedy Generating Station in Duval County. The project also includes a 90-foot new stack.

This facility is located at 4215 Talleyrand Ave in Jacksonville, Duval County, Florida. UTM coordinates are: Zone 17; 440,0 km E and 3,591,00 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

ATTACHED APPENDICES MADE A PART OF THIS PERMIT:

Appendix GC Construction Permit General Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

AIR CONSTRUCTION PERMIT 0310047-002-AC

SECTION I. FACILITY INFORMATION

FACILITY DESCRIPTION

Currently, this facility generates electric power from a 134 MW and two 44 MW natural gas/fuel oil-fired steam units, an auxiliary 21 MW boiler, and three oil fired 56.2 MW combustion turbines used as peaking units, all with a combined generating capacity of approximately 412 MW.

This permitting action is to install one (1) natural gas/fuel-fired simple cycle unit that will consist of a nominal 170 MW (at 59 °F) combustion turbine-generator equipped with Dry Low NO_x (DLN-2.6) combustors. The CT proposed is a General Electric PG 7241 FA and will be used as a peaking unit. This turbine will replace one existing natural gas/fuel oil-fired boiler identified by JEA as KE10 (ARMS Emission Unit 009) at the Kennedy Generating Station in Duval County. The project also includes a 90-foot new stack .

This Project is exempt from the requirements of Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) as discussed stated in the Technical Evaluation and Preliminary Determination dated January 29, 1999.

EMISSION UNITS

This permit addresses the following emission unit:

Emission Unit No.	System	Emission Unit Description
00X	Power Generation	One 170 MW Simple Cycle Combustion Turbine-Generator - Peaking Unit

REGULATORY CLASSIFICATION

This facility, JEA Kennedy Generating Station, is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD).

This facility is a major source of hazardous air pollutants (HAPs) and is also subject to the provisions of Title IV, Acid Rain, Clean Air Act as amended in 1990 (Title V application received June 14, 1996).

AIR CONSTRUCTION PERMIT 0310047-002-AC

SECTION I. FACILITY INFORMATION

PERMIT SCHEDULE

- xx/xx/99 Notice of Intent published in _____
- 01/29/99 Distributed Intent to Issue Permit
- 12/23/98 Application deemed complete
- 10/30/98 Received Application

RELEVANT DOCUMENTS:

The documents listed below are the basis of the permit. They are specifically related to this permitting action, but not all are incorporated into this permit. These documents are on file with the Department.

- Application received on October 30, 1998.
- Department's Intent to Issue and Public Notice Package dated January 29, 1999.
- EPA comments dated February xx, 1999.
- JEA's comments dated December 23, 1998, January 19 and February XX, 1999.

AIR CONSTRUCTION PERMIT 0310047-002-AC

SECTION II. EMISSION UNIT(S) ADMINISTRATIVE REQUIREMENTS

1. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (DEP), at 2600 Blirstone Road, Tallahassee, Florida 32399-2400 and phone number (850)488-0114. All documents related to reports, tests, and notifications should be submitted to the Jacksonville Regulatory & Environmental Services Department (RESD) Air & Water Quality Division, Suite 225, 117 W. Duval Street, Jacksonville, Florida 32202 and phone number 904/630-3484; and a copy to the DEP Northeast District offices, 7825 Baymeadows Way, Suite 200B Jacksonville, Florida 32256-7590 and phone number 904/448-4300.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
5. Modifications: The permittee shall give written notification to the Department when there is any modification to this facility. This notice shall be submitted sufficiently in advance of any critical date involved to allow sufficient time for review, discussion, and revision of plans, if necessary. Such notice shall include, but not be limited to, information describing the precise nature of the change; modifications to any emission control system; production capacity of the facility before and after the change; and the anticipated completion date of the change. [Chapters 62-210 and 62-212]
6. Permit Extension: *This permit expires on December 31, 2002.* The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rule 62-4.080, F.A.C.].
7. Application for Title IV Permit: An application for a Title IV Acid Rain Permit, must be submitted to the U.S. Environmental Protection Agency Region IV office in Atlanta, Georgia and a copy to the DEP's Bureau of Air Regulation in Tallahassee 24 months before the date on which the new unit begins serving an electrical generator (greater than 25 MW). [40 CFR 72]
8. Application for Title V Permit: An application for a Title V operating permit, pursuant to Chapter 62-213, F.A.C., must be submitted to the DEP's Bureau of Air Regulation, and a copy sent to the Department's Northeast District and the Jacksonville Regulatory & Environmental Protection Commission offices. [Chapter 62-213, F.A.C.]

AIR CONSTRUCTION PERMIT 0310047-002-AC

SECTION II. EMISSION UNIT(S) ADMINISTRATIVE REQUIREMENTS

9. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
10. Annual Reports: Pursuant to Rule 62-210.370(2), F.A.C., Annual Operation Reports, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports shall be sent to the DEP's Northeast District and Jacksonville RESD's Air & Water Quality Division offices by March 1st of each year.
11. Stack Testing Facilities: Stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C.
12. Quarterly Reports: Quarterly excess emission reports, in accordance with 40 CFR 60.7 (a)(7) (c) (1997 version), shall be submitted to the DEP's Northeast District and Jacksonville RESD's Air & Water Quality Division offices.

AIR CONSTRUCTION PERMIT 0310047-002-AC

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

APPLICABLE STANDARDS AND REGULATIONS:

1. Unless otherwise indicated in this permit, the construction and operation of the subject emission unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297; and the applicable requirements of the Code of Federal Regulations Section 40, Parts 60, 72, 73, and 75.
2. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]
3. These emission units shall comply with all applicable requirements of 40CFR60, Subpart A, General Provisions including:
 - 40CFR60.7, Notification and Recordkeeping
 - 40CFR60.8, Performance Tests
 - 40CFR60.11, Compliance with Standards and Maintenance Requirements
 - 40CFR60.12, Circumvention
 - 40CFR60.13, Monitoring Requirements
 - 40CFR60.19, General Notification and Reporting requirements
4. ARMS Emission Unit 0XX, Power Generation, consisting of one (nominal) 170 MW combustion turbines (simple cycle peaking operation), shall comply with all applicable provisions of 40CFR60, Subpart GG, Standards of Performance for Stationary Gas Turbines, adopted by reference in Rule 62-204.800(7)(b), F.A.C. The Subpart GG requirement to correct test data to ISO conditions applies. However, such correction is not required to demonstrate compliance with non-NSPS permit standard(s).
5. All notifications and reports required by the above specific conditions shall be submitted to the DEP's Northeast District and Jacksonville RESD's Air & Water Quality Division offices.

GENERAL OPERATION REQUIREMENTS

6. Fuels: Only pipeline natural gas or maximum 0.05 percent sulfur fuel oil No. 2 or superior grade of distillate fuel oil shall be fired in this unit. [Applicant Request, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]
7. Turbine Capacity: The maximum heat input rates to this combustion turbine based on the lower heating value (LHV) of the fuel at ambient conditions of 59° F, 60% relative humidity, 100% load, and 14.7 psi pressure shall not exceed 1,623 million Btu per hour (MMBtu/hr) while firing gas and 1,822 million Btu per hour (MMBtu/hr) while firing fuel oil. This maximum heat input rate will vary depending upon turbine inlet conditions and the combustion turbine characteristics. Manufacturer's curves corrected for site conditions or equations for correction to other ambient conditions shall be provided to the Department of Environmental Protection (DEP) within 45 days of completing the initial compliance testing. [Design, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

AIR CONSTRUCTION PERMIT 0310047-002-AC

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

8. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary.
9. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the owner or operator shall notify the DEP Northeast District and Jacksonville RESD's Air & Water Quality Division offices as soon as possible, but at least within (1) working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]
10. Operating Procedures: Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.]
11. Circumvention: The owner or operator shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
12. Maximum allowable hours of operation in any twelve month period: (MAXHROP) for this peaking unit shall not exceed 4050 hours on gas or 1260 hours on fuel oil or the hours calculated pursuant to the following formula:
$$\text{MAXHROP} = 4050 - 3.215 * \text{ACTHROPFO}$$

Where: ACTHROPFO = Actual hours of operation on fuel oil
[Applicant Request, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

Control Technology

13. Dry Low NO_x (DLN) combustor shall be installed on this stationary combustion turbine to control nitrogen oxides (NO_x) emissions. [Design, Rule 62-4.070, F.A.C.]
14. The permittee shall provide manufacturer's emissions performance versus load diagrams for the DLN systems prior to their installation. DLN systems shall each be tuned upon initial operation to optimize emissions reductions and shall be maintained to minimize NO_x emissions and CO emissions. [Rule 62-4.070, and 62-210.650 F.A.C.]
15. A water injection system shall be installed for use when firing No. 2 or superior grade distillate fuel oil for control of NO_x emissions. [Design, Rules 62-4.070 and 62-212.400, F.A.C.]

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SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

EMISSION LIMITS AND STANDARDS

16. Following are the emission limits determined for this project assuming full load. Values for NO_x are at 15% O₂ on a dry basis. These limits or their equivalents in terms of pounds per hour, as well as the applicable averaging times, are followed by the applicable specific conditions. [Applicant Requests, Rules 62-204.800(7)(b) (Subparts GG), 62-210.200 (Definitions-Potential Emissions), F.A.C.].

NO _x	SO ₂	CO	VOC	PM/Visibility (% Opacity)	Technology and Comments
15 ppm (NG)	<2gr/100scf (NG)	15 ppm (NG)	1.4 ppm (NG)	10	Dry Low NO _x Combustors Pipeline Natural Gas Good Combustion Fuel Oil, 0.05% Sulfur Content
42 ppm (FO)	0.05% (FO)	20 ppm (FO)	3.5 ppm (FO)		

17. Nitrogen Oxides (NO_x) Emissions:

- The concentration of NO_x concentrations in the exhaust gas of this CT shall not exceed 15 ppm at 15% O₂ (on a 24-hr block average) as measured by the CEMS (maintained in accordance with 40 CFR 75) while burning natural gas. In addition, NO_x emissions calculated as NO₂ (at ISO conditions) shall exceed neither 15 ppm at 15% O₂ nor 99 lb/hr to be demonstrated by stack test. Total annual NO_x emissions shall not exceed 200 tons per year (gas/oil or gas or oil). [Rules 62-4.070 and 62-212.400, F.A.C. to avoid PSD Review]
- The concentration of NO_x concentrations in the exhaust gas of this CT shall not exceed 42 ppm at 15% O₂ (on a 24-hr block average) as measured by the CEMS (maintained in accordance with 40 CFR 75) while burning fuel oil. In addition, NO_x emissions calculated as NO₂ (at ISO conditions) shall exceed neither 42 ppm at 15% O₂ nor 318 lb/hr to be demonstrated by stack test. Total annual NO_x emissions shall not exceed 200 tons per year (gas/oil or gas or oil). [Rules 62-4.070 and 62-212.400, F.A.C. to avoid PSD Review]
- When NO_x monitoring data is not available, substitution for missing data shall be handled as required by Title IV (40 CFR 75) to calculate the specified average time.

18. Visible Emissions (VE): VE emissions shall not exceed 10 percent opacity.

19. Carbon Monoxide (CO) emissions: The concentration of CO in the exhaust gas shall not exceed 15 ppmvd (gas) and 20 ppmvd (oil) as measured by EPA Method 10. CO emissions (at ISO conditions) shall not exceed 48 lb/hr (gas) and 97 lb/hr (oil) to be demonstrated by stack test.

20. Volatile Organic Compounds (VOC) Emissions: The concentration of VOC in the exhaust gas shall not exceed 1.4 ppmvd (gas) and 3.5 ppm (oil) as determined by EPA Methods 18, 25 or 25 A. VOC emissions (at ISO conditions) shall not exceed 2.9 lb/hr (gas) and 19 lb/hr (oil).

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21. Sulfur Dioxide (SO₂) emissions: SO₂ emissions (at ISO conditions) shall not exceed 9.7 pounds per hour when firing pipeline natural gas and 98 pounds per hour when firing maximum 0.05 percent sulfur No. 2 or superior grade distillate fuel oil. Initial tests shall be performed by applicable compliance methods described below. Compliance with this requirement in conjunction with implementation of the Custom Fuel Monitoring Schedules in Specific Conditions 41 and 42 will demonstrate compliance with the applicable NSPS SO₂ emissions limitations. Confirmation by the Custom Fuel Monitoring Schedule that the actual sulfur content is less than 2 grains per 100 standard cubic feet (gas) and 0.05 % sulfur content (fuel oil) will demonstrate compliance with the permit limits for SO₂. Emissions of SO₂ shall not exceed 62 tons per year. [Rules 62-4.070 and 62-212.400, F.A.C. to avoid PSD Review]

EXCESS EMISSIONS

22. Excess emissions resulting from startup, shutdown, or malfunction shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700, F.A.C.].
23. Excess emissions entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction, shall be prohibited pursuant to Rule 62-210.700, F.A.C.
24. Excess Emissions Report: If excess emissions occur for more than two hours due to malfunction, the owner or operator shall notify DEP's Northeast District and Jacksonville RESD's Air & Water Quality Division offices within (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Pursuant to the New Source Performance Standards, all excess emissions shall also be reported in accordance with 40 CFR 60.7, Subpart A. Following this format, 40 CFR 60.7, periods of startup, shutdown, malfunction, and fuel switching shall be monitored, recorded, and reported as excess emissions when emission levels exceed the permitted standards listed in Specific Condition No. 16 and 17. [Rules 62-4.130, 62-204.800, 62-210.700(6), F.A.C., and 40 CFR 60.7 (1997 version)].

COMPLIANCE DETERMINATION

25. Compliance with the allowable emission limiting standards shall be determined within 60 days after achieving the maximum production rate at which each unit will be operated, but not later than 180 days following initial operation of the unit, and annually thereafter as indicated in this permit, by using the following reference methods as described in 40 CFR 60, Appendix A (1997 version), and adopted by reference in Chapter 62-204.800, F.A.C.

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26. Initial (I) performance stack tests shall be performed on this unit while firing natural gas and fuel oil. Annual (A) compliance tests shall be performed during every federal fiscal year (October 1 - September 30) pursuant to Rule 62-297.310(7), F.A.C., on these units as indicated. The following reference methods shall be used. No other test methods may be used for compliance testing unless prior DEP approval is received in writing.
- EPA Reference Method 9, "Visual Determination of the Opacity of Emissions from Stationary Sources" (I, A).
 - EPA Reference Method 10, "Determination of Carbon Monoxide Emissions from Stationary Sources" (I, A).
 - EPA Reference Method 20, "Determination of Oxides of Nitrogen Oxide, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines." Initial test only for compliance with 40CFR60 Subpart GG.
 - EPA Reference Method 18 or 25 and/or 25A, "Determination of Volatile Organic Concentrations." Initial test only.
27. Continuous compliance with the NO_x emission limits: Continuous compliance with the NO_x emission limits shall be demonstrated with the CEM system based on the applicable averaging time of 24-hr block average. Based on CEMS data, a separate compliance determination is conducted at the end of each operating day and a new average emission rate is calculated from the arithmetic average of all valid hourly emission rates from the previous operating day. Valid hourly emission rates shall not include periods of start up, shutdown, or malfunction unless prohibited by 62-210.700 F.A.C. A valid hourly emission rate shall be calculated for each hour in which at least two NO_x concentrations are obtained at least 15 minutes apart. These excess emissions periods shall be reported as required in Condition 24. [Rules 62-4.070 F.A.C., 62-210.700, F.A.C., and 40 CFR 75]
28. Compliance with the SO₂ and PM/PM₁₀ emission limits: Notwithstanding the requirements of Rule 62-297.340, F.A.C., the use of pipeline natural gas and maximum 0.05 percent sulfur (by weight) No. 2 or superior grade distillate fuel oil, is the method for determining compliance for SO₂ and PM₁₀. For the purposes of demonstrating compliance with the 40 CFR 60.333 SO₂ standard and the 0.05% S limit, fuel oil analysis using ASTM D2880-71 or D4294 (or equivalent) for the sulfur content of liquid fuels and D1072-80, D3031-81, D4084-82 or D3246-81 (or equivalent) for sulfur content of gaseous fuel shall be utilized in accordance with the EPA-approved custom fuel monitoring schedule. The applicant is responsible for ensuring that the procedures above are used for determination of fuel sulfur content. Analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency pursuant to 40 CFR 60.335(e) (1997 version).

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29. Compliance with CO emission limit: An initial test for CO, shall be conducted concurrently with the initial NO_x test, as required. The initial NO_x and CO test results shall be the average of three valid one-hour runs. Annual compliance testing for CO may be conducted at less than capacity when compliance testing is conducted concurrent with the annual NO_x RATA testing which is performed pursuant to 40 CFR 75.
30. Compliance with the VOC emission limit: An initial test is required to demonstrate compliance with the VOC emission limit. Thereafter, CO emission limit will be employed as a surrogate and no annual testing is required.
31. Testing procedures: Testing of emissions shall be conducted with the combustion turbine operating at permitted capacity. Permitted capacity is defined as 95-100 percent of the maximum heat input rate allowed by the permit, corrected for the average turbine inlet temperature during the test (with 100 percent represented by a curve depicting heat input vs. ambient temperature). If it is impracticable to test at permitted capacity, the source may be tested at less than permitted capacity. In this case, subsequent operation is limited by adjusting the entire heat input vs. turbine inlet temperature curve downward by an increment equal to the difference between the maximum permitted heat input (corrected for ambient temperature) and 105 percent of the value reached during the test until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity. Test procedures shall meet all applicable requirements (i.e., testing time frequency, minimum compliance duration, etc.) of Chapter 62-204.800 F.A.C.
32. Test Notification: The DEP's Northeast District and Jacksonville RESD's Air & Water Quality Division offices shall be notified, in writing, at least 30 days prior to the initial performance tests and at least 15 days before annual compliance test(s).
33. Special Compliance Tests: The DEP may request a special compliance test pursuant to Rule 62-297.310(7), F.A.C., when, after investigation (such as complaints, increased visible emissions, or questionable maintenance of control equipment), there is reason to believe that any applicable emission standard is being violated.
34. Test Results: Compliance test results shall be submitted to the DEP's Northeast District and Jacksonville RESD's Air & Water Quality Division offices no later than 45 days after completion of the last test run.

NOTIFICATION, REPORTING, AND RECORDKEEPING

35. Records: All measurements, records, and other data required to be maintained by the permittee shall be recorded in a permanent form and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. These records shall be made available to DEP representatives upon request.

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36. Emission Compliance Stack Test Reports: A test report indicating the results of the required compliance tests shall be filed with the DEP Northeast District and Jacksonville RESD's Air & Water Quality Division Offices as soon as practical, but no later than 45 days after the last sampling run is completed. [Rule 62-297.310(8), F.A.C.]. The test report shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8), F.A.C.

MONITORING REQUIREMENTS

37. Continuous Monitoring System: The permittee shall install, calibrate, maintain, and operate a continuous emission monitor in the stack to measure and record the nitrogen oxides emissions from this unit. Periods when NO_x emissions (ppmvd at 15% oxygen) are above the standards, listed in Specific Condition No 16 and 17, shall be provided to the DEP Bureau of Air Monitoring and Mobile Sources pursuant to 40CFR75.
38. CEMS in lieu of Water to Fuel Ratio: Subject to EPA approval, the NO_x CEMS shall be used in lieu of the water/fuel monitoring system for reporting excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG (1997 version). Subject to EPA approval, the calibration of the water/fuel monitoring device required in 40 CFR 60.335(c)(2) (1997 version) will be replaced by the 40 CFR 75 certification tests of the NO_x CEMS. Upon request from DEP, the CEMS emission rates for NO_x on this Unit shall be corrected to ISO conditions to demonstrate compliance with the NO_x standard established in 40 CFR 60.332.
39. CEMS in lieu of the requirement for reporting excess emissions: Subject to EPA approval, the NO_x CEMS shall be used in lieu of the requirement for reporting excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG (1997 version). Upon request from DEP, the CEMS emission rates for NO_x on this CT shall be corrected to ISO conditions to demonstrate compliance with the NO_x standard established in 40 CFR 60.332.
40. Continuous Monitoring System Reports: The monitoring devices shall comply with the certification and quality assurance, and any other applicable requirements of Rule 62-297.520, F.A.C., 40 CFR 60.13, including certification of each device in accordance with 40 CFR 60, Appendix B, Performance Specifications and 40 CFR 60.7(a)(5) or 40 CFR Part 75. Quality assurance procedures must conform to all applicable sections of 40 CFR 60, Appendix F or 40CFR75. Data on CEM equipment specifications, manufacturer, type, calibration and maintenance needs, and its proposed location shall be provided to the Department's Northeast District and Jacksonville RESD's Air & Water Quality Division Offices for review at least 90 days prior to installation.
41. Natural Gas Monitoring Schedule: The following custom monitoring schedule for natural gas is approved in lieu of the daily sampling requirements of 40 CFR 60.334 (b)(2):

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- The permittee shall apply for an Acid Rain permit within the deadlines specified in 40 CFR 72.30.
- The permittee shall submit a monitoring plan, certified by signature of the Designated Representative (DR), that commits to using a primary fuel of pipeline supplied natural gas (sulfur content less than 20 gr/100 scf pursuant to 40 CFR 75.11(d)(2)).
- This unit shall be monitored for SO₂ emissions using methods consistent with the requirements of 40 CFR 75.11 and certified by the USEPA.

This custom fuel monitoring schedule will only be valid when pipeline natural gas is used as a primary fuel. If the primary fuel for this unit is changed to a higher sulfur fuel, SO₂ emissions must be accounted for as required pursuant to 40 CFR 75.11(d).

42. Fuel Oil Monitoring Schedule: The following monitoring schedule for No. 2 or superior grade fuel oil shall be followed: For all bulk shipments of No. 2 or superior grade fuel oil received at the Kennedy Center Station, an analysis which reports the sulfur content and nitrogen content of the fuel shall be provided by the fuel vendor. The analysis shall also specify the methods by which the analyses were conducted and shall comply with the requirements of 40 CFR 60.335(d).

43. Determination of Process Variables:

- The permittee shall operate and maintain equipment and/or instruments necessary to determine process variables, such as process weight input or heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission-limiting standards.
- Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weigh hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value [Rule 62-297.310(5), F.A.C].

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SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

Additional services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Doug Neeley, Chief
Air Branch
US EPA Region IV
61 Joseph St.
Atlanta, GA 30303

4a. Article Number

Z 333 612 509

4b. Service Type

- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery

5. Received By: (Print Name)

JOYCE EVANS

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addresser or Agent)

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PS Form 3811, December 1994

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Postage	\$
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Return Receipt Showing to Whom & Date Delivered	
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TOTAL Postage & Fees	\$
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