

21 West Church Street  
Jacksonville, Florida 32202-3139

RECEIVED

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October 7, 2004

BUREAU OF AIR REGULATION



Jim Pennington, P.E.  
Administrator  
Permitting North  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

ELECTRIC

WATER

SEWER

RE: Brandy Branch Generating Station  
Simple Cycle Combustion Turbines (Units 1, 2, 3)  
Kennedy Generating Station  
Simple Cycle Combustion Turbine (Unit 7)

Dear Mr. Pennington:

Per Bert Gianazza's correspondences dated September 21 and 22, please issue permit revisions to remove the nitrogen testing requirements for the above referenced units in accordance with the EPA final rule published in the Federal Register dated July 8, 2004 revising the standards of performance for stationary gas turbines (40 CFR 60, subpart GG).

If you have any questions, please don't hesitate to call me at 665-4433 or Bert Gianazza at 665-6247.

Sincerely,

A handwritten signature in cursive script, appearing to read 'James M. Chansler'.

James M. Chansler, P.E., D.P.A.  
Responsible Official  
Vice President, Operations and Maintenance

cc: Bruce Mitchell, P.E., DEP

21 West Church Street  
Jacksonville, Florida 32202-3139

September 22, 2004



Jim Pennington, P.E.  
Administrator  
Permitting North  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

ELECTRIC

WATER

SEWER

RE: Brandy Branch Generating Station  
Simple Cycle Combustion Turbines (Units 1, 2, 3)  
Title V Permit 0310485-005-AV  
Air Construction Permit PSD-FL-267

Dear Mr. Pennington:

Project No.: 0310485-009-AC  
-013-AC

In accordance with the EPA final rule published in the Federal Register dated July 8, 2004 revising the standards of performance for stationary gas turbines (40 CFR 60, subpart GG), we request a revision to specific condition A.24 of the above referenced Title V permit and condition 44 of the above referenced PSD permit to remove the requirement for nitrogen testing of diesel fuel. NOx CEMs are used on these units to show compliance with the NOx limits, and the allowance for fuel bound nitrogen is not claimed.

If you have any questions, please don't hesitate to call me at 665-6247.

Sincerely,

N. Bert Gianazza, P.E.  
Environmental Services

cc: Robert S. Pace, P.E., EQD

21 West Church Street  
Jacksonville, Florida 32202-3139

September 21, 2004



Jim Pennington, P.E.  
Administrator  
Permitting North  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

WATER

RE: Kennedy Generating Station  
Simple Cycle Combustion Turbine Unit 7  
Title V Permit 0310047-01-AV

SEWER

Project No.: 0310047-013-AC

Dear Mr. Pennington:

In accordance with the EPA final rule published in the Federal Register dated July 8, 2004 revising the standards of performance for stationary gas turbines (40 CFR 60, subpart GG), we request a revision to specific condition D.30 of the above referenced permit to remove the requirement for nitrogen testing of diesel fuel. A NOx CEMs is used on this unit to show compliance with the NOx limits, and the allowance for fuel bound nitrogen is not claimed.

If you have any questions, please don't hesitate to call me at 665-6247.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Bert Gianazza', is written over a horizontal line.

N. Bert Gianazza, P.E.  
Environmental Services

cc: Robert S. Pace, P.E., EQD