

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Bureau of Air Regulation
FROM: Syed Arif, New Source Review Section SA
DATE: September 2, 2008
SUBJECT: Draft Air Permit No. 0310047-018-AC; PSD-FL-386A
JEA – Kennedy Generating Station
Combustion Turbine No. 8

This project is subject to minor source preconstruction review. Attached for your review are the following items:

- Written Notice of Intent to Issue Air Permit;
- Public Notice of Intent to Issue Air Permit;
- Technical Evaluation and Preliminary Determination; and
- Draft Modification Letter

The Draft Modification Letter authorizes revisions of several specific conditions of air construction permit PSD-FL-386 issued on May 4, 2007 for Combustion Turbine No. 8 at the existing Kennedy Generating Station. The facility is located in Duval County, Florida. The Technical Evaluation and Preliminary Determination provide a detailed description of the project and the rationale for issuance. I recommend your approval of the attached Draft Permit.

Attachments

P.E. CERTIFICATION STATEMENT

APPLICANT

JEA
21 West Church Street
Jacksonville, Florida 32202

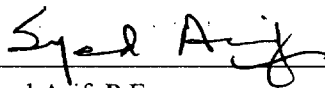
Air Permit No. PSD-FL-386A
Project No. 0310047-018-AC
Kennedy Generating Station
Simple Cycle Combustion Turbine
Duval County, Florida

PROJECT DESCRIPTION

On May 4, 2007, the Department authorized the construction of a simple cycle combustion turbine generator No. 8, with a nominal output of 172 megawatts at the existing Kennedy Generating Station. The project was reviewed under the Prevention of Significant Deterioration (PSD) rules and Best Available Control Technology determination was made for particulate matter emissions. The applicant has requested revisions to some of the specific conditions of the permit. Most of the changes are minor in nature and deals with additional explanation of the specific condition language.

An air quality impact analysis was not required. No increase in emissions and no increase in ambient impacts due to the proposed permit revisions are expected. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Syed Arif, P.E.
Registration No. 51861

9/3/08

(Date)



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

September 4, 2008

Sent by Electronic Mail – Received Receipt Requested

Mr. James M. Chansler, P.E., D.P.A.
Chief Operating Officer, JEA
21 West Church Street
Jacksonville, Florida 32202

Re: DEP File No. 0310047-018-AC; PSD-FL-386A
Kennedy Generating Station
Combustion Turbine No. 8

Dear Mr. Chansler:

On July 11, 2008, JEA submitted a letter request for revisions of several specific conditions of air construction permit PSD-FL-386 issued on May 4, 2007. Permit PSD-FL-386 authorized the construction of a simple cycle combustion turbine generator with a nominal output of 172 megawatts at the existing Kennedy Generating Station, which is located in Duval County at 4215 Talleyrand Avenue, Jacksonville, Florida. Enclosed are the following documents:

- Written Notice of Intent to Issue Air Permit;
- Public Notice of Intent to Issue Air Permit;
- Technical Evaluation and Preliminary Determination; and
- Draft Modification Letter.

The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the Project Engineer, Syed Arif, at 850/921-9528.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

TLV/sa

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

JEA
21 West Church Street
Jacksonville, Florida 32202

Project No. 0310047-018-AC
Air Permit No. PSD-FL-386A
Kennedy Generating Station
Combustion Turbine No. 8
Duval County, Florida

Authorized Representative:
Mr. James M. Chansler, P.E., D.P.A.
Chief Operating Officer

Facility Location: JEA operates Kennedy Generating Station, which is located at 4215 Talleyrand Avenue in Duval County, Florida.

Project: The applicant proposes the following: revisions of several specific conditions of air construction permit PSD-FL-386 issued on May 4, 2007 for Combustion Turbine No. 8 at the existing Kennedy Generating Station. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority'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 when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority'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, F.A.C.

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

Mediation: Mediation is not available in this proceeding.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

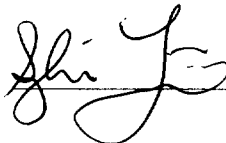
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by electronic mail with received receipt requested before the close of business on 9/3/08 to the persons listed below.

- Mr. James M. Chansler, P.E., D.P.A., JEA (chanjm@jea.com)
- Mr. Bert Gianazza, P.E., JEA (giannb@jea.com)
- Mr. Chris Kirts, DEP-NED (christopher.kirts@dep.state.fl.us)
- Mr. Richard Robinson, P.E., EQD (robinson@coj.net)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Mr. Dee Morse, NPS (dee_morse@nps.gov)

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.



(Clerk)

9/3/08

(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Permit No. 0310047-018-AC; PSD-FL-386A
JEA – Kennedy Generating Station
Duval County, Florida

Applicant: The applicant for this project is JEA. The applicant's authorized representative and mailing address is: Mr. James M. Chansler, Chief Operating Officer, JEA, 21 West Church Street, Jacksonville, Florida 32202.

Facility Location: JEA operates the existing Kennedy Generating Station, which is located in Duval County at 4215 Talleyrand Avenue, Jacksonville, Florida.

Project: On May 4, 2007, the Department authorized the construction of a simple cycle combustion turbine generator No. 8, with a nominal output of 172 megawatts at the existing Kennedy Generating Station. The project was reviewed under the Prevention of Significant Deterioration (PSD) rules and Best Available Control Technology determination was made for particulate matter emissions. The applicant has requested revisions to some of the specific conditions of the permit. Most of the changes are minor in nature and deal with additional explanation of the specific condition language.

An air quality impact analysis was not required. No increase in emissions and no increase in ambient impacts due to the proposed permit revisions are expected. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site:
<http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority'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 rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority'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, F.A.C.

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

Mediation: Mediation is not available for this proceeding.

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

Project No. 0310047-018-AC
Air Permit No. PSD-FL-386A
JEA – Kennedy Generating Station
ARMS Facility ID No. 0310047
Combustion Turbine No. 8

COUNTY

Duval County, Florida

APPLICANT

JEA
Kennedy Generating Station
21 West Church Street
Jacksonville, FL 32202

PERMITTING AUTHORITY

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



September 2, 2008

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

I. GENERAL PROJECT INFORMATION

A. Facility Description and Location

The facility is an electric services facility, which is categorized under Standard Industrial Classification Code SIC No. 4911. The UTM coordinates are Zone 17, 440.67 km East, and 3359.15 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS).

B. Facility Regulatory Categories

Title III: The facility is not a major source of hazardous air pollutants (HAP).

Title IV: The facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

C. Project Description

Air Permit No. PSD-FL-386 authorized the construction of a simple cycle combustion turbine (CT) generator, CT No. 8 (Emission Unit No. 016), with a nominal output of 172 megawatts (MW) at the existing Kennedy Generating Station. The permit was issued on May 4, 2007. The applicant has submitted this request for some minor permit revisions to the original PSD-FL-386 permit. The details of the permit revisions and Department's responses are as follows. Please note that double underlined words are additions and strikethrough words are deletions.

Permit Revision Request #1: Currently Specific Condition 29.b. reads as follows:

"Malfunction Notification: For each malfunction resulting in excess emissions, the permittee shall notify the Compliance Authority within one 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 compliance Authority may request a written summary report of the incident."

The applicant would like to clarify that the reporting of excess emissions resulting from malfunction should only be reported if the excess emissions exceed 2 hours in a 24 hour period.

Department's Response for Request #1: Specific Condition 29.b. will be changed to read as follows:

Malfunction Notification: For each malfunction resulting in excess emissions that exceed two hours in any 24 hour period, the permittee shall notify the Compliance Authority within one 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 Compliance Authority may request a written summary report of the incident.

Additionally, the heading of the Specific Condition 29 will be changed from NSPS Emission Reports to Emission Reports and Specific Condition 29.a. will have a sub-heading of NSPS Emissions Report.

Specific Condition 29 will be changed to read as follows:

NSPS Emissions Reports

- a. NSPS Emissions Report: Within thirty (30) days following each calendar semiannual period, the permittee shall submit a report including any applicable periods of excess emissions and monitoring systems performance as defined in 40 CFR 60, Subpart KKKK (Standards of Performance for Stationary Combustion Turbines) that occurred during the previous semiannual period to the Compliance Authority.
- b. Malfunction Notification: For each malfunction resulting in excess emissions that exceed two hours in any 24 hour period, the permittee shall notify the Compliance Authority within one working day of: the

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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 Compliance Authority may request a written summary report of the incident.

[Rules 62-4.070(3), 62-4.130, 62-204.800, 62-210.700(6) and 62-212.400(BACT), F.A.C.; and 40 CFR 60.7 and 60.4395]

Permit Revision Request #2: The current expiration date of the subject construction permit is December 31, 2008. The expected commercial operation date is early 2009 which will be followed by a request for a permit revision to the Title V permit for this facility to include the new combustion turbine. The applicant requests that the expiration date of the construction permit be revised to December 31, 2009.

Department's Response for Request #2: The Department will extend the expiration date of the construction permit to December 31, 2009.

Permit Revision Request #3: The applicant indicated that under Specific Condition 12, the basis of the NO_x limits should be new source performance standards (NSPS) Subpart KKKK which is on a concentration basis. The mass emission rate (lb/hr) limits should be omitted because there is no regulatory basis. Also, the permit should clearly state that excess emissions during startups, shutdowns and malfunctions are allowed if it doesn't exceed two hours in any 24-hour period.

Department's Response for Request #3: The applicant in consultation with the Department on this issue has agreed in conducting initial mass emission rate test for natural gas and fuel oil operation. The Department will make the necessary changes in the permit condition to reflect that the mass emission rate testing will be done initially when the unit is started up. The Department has made it clear in Permit Revision Request #1 that excess emissions during startups, shutdowns and malfunctions are allowed if it doesn't exceed two hours in any 24-hour period. The Department acknowledges that the Environmental Protection Agency (EPA) in the preamble to Subpart KKKK responded to some commenter's wanting clarification on the applicability of NO_x standards during periods of startup, shutdown and malfunction. EPA responded as follows:

"Regarding the negative stigma, we cannot determine how other parties interpret the final rule. It is clear that continuous compliance is not a requirement of the final rule *during periods of startup, shutdown and malfunction.*" (italics added by the Department)

The Department notes that the foregoing applies to Subpart KKKK.

Specific Condition 12 will be changed to read as follows:

Emission Standards: Emissions from each combustion turbine shall not exceed the following emissions standards.

Pollutant	Emission Standard ^c	Averaging Time	Compliance Method	Basis
CO ^a (Gas)	9.0 ppmvd @ 15% O ₂	3-hour test avg.	EPA Method 10 Test	Avoid PSD
	32.0 lb/hour			
CO ^a (Oil)	20.0 ppmvd @ 15% O ₂	3-hour test avg.	EPA Method 10 Test	
	66.0 lb/hour			
NO _x ^b (Gas)	15.0 ppmvd @ 15% O ₂	4 hour rolling average	CEMS	Avoid PSD
	108.3 lb/hour	3-hour test avg.	CEMS and EPA Method 19	Avoid PSD
NO _x ^b (Oil)	42 ppmvd @ 15% O ₂	4 hour rolling average	CEMS	Avoid PSD
	335.0 lb/hour	3-hour test avg.	CEMS and EPA Method 19	
PM/PM ₁₀ ^c	10% Opacity	6-minute block	EPA Method 9 Test	BACT

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Pollutant	Emission Standard ^e	Averaging Time	Compliance Method	Basis
	Fuel sulfur specifications	N/A	Record Keeping	
SO ₂ ^d (Gas)	2 grains S/100 SCF of gas	N/A	Record Keeping	Avoid PSD
SO ₂ ^d (Oil)	0.05% sulfur by weight	N/A	Record Keeping	Avoid PSD

- a. The permittee shall conduct an initial test to demonstrate compliance with the CO emissions limits for the unit as constructed. Subsequent compliance tests shall be conducted during the year prior to renewing the Title V operating permit.
- b. Continuous compliance shall be demonstrated with the 4-hour rolling average NO_x emissions limit (ppmvd @ 15% O₂) by data collected from the required continuous emissions monitoring system (CEMS). If the CEMS data indicates that the 4-hour rolling average is in excess of the emission limit, excess emission reports must be filed. Compliance with the NO_x emissions limit (lb/hr) shall be demonstrated only during the initial compliance test by converting the NO_x CEMS data collected during the initial CO test by using the applicable F-Factor and EPA Method 19.
- c. The fuel sulfur specifications combined with the efficient combustion design and operation of the combustion turbine represents BACT for PM/PM₁₀ emissions. No stack tests are required. Compliance with the CO and visible emissions standards shall serve as indicators of good combustion. *{Permitting Note: Maximum expected PM/PM₁₀ emissions are approximately 19 lb/hour on natural gas and 45.0 lb/hr on oil.}*
- d. The fuel sulfur specifications effectively limit the potential emissions of sulfur dioxide (SO₂) from each combustion turbine. No stack tests are required.
- e. The mass emission rate standards are based on a turbine inlet condition of 59° F and the higher heating value of each fuel. Mass emission rates may be adjusted for actual test conditions in accordance with the performance curves and/or equations on file with the Department.

[Rule 62-212.400 (BACT), F.A.C.; Rule 62-4.070(3), F.A.C.]

Permit Revision Request #4: The applicant requested that in Specific Condition 23, the words “annual and” should be removed from the statement “The annual and required RATA tests required for the NO_x monitor shall be performed using EPA Method 20 or 7E in Appendix A of 40 CFR 60.” Depending on how often the turbine operates, Part 75 RATA tests may not be required annually. Compliance is demonstrated using CEMS, so annual stack testing should not be required.

Department’s Response for Request #4: The Department is in agreement with the applicant on this request. Specific Condition 23 will be changed to read as follows:

CEM Systems: The permittee shall install, calibrate, maintain, and operate continuous emission monitoring systems (CEMS) to measure and record the emissions of NO_x from the combustion turbine in a manner sufficient to demonstrate continuous compliance with the CEMS emission standards of this section. All continuous monitoring systems shall be installed and functioning within the required performance specification by the time of the initial performance tests.

- a. **NO_x Monitor:** Each NO_x monitor shall be certified pursuant to the specifications of 40 CFR 75 and comply with the applicable requirements of 40 CFR 60 Subpart KKKK. Quality assurance procedures shall conform to the requirements of 40 CFR 75. ~~The annual and required~~ RATA tests required for the NO_x monitor shall be performed using EPA Method 20 or 7E in Appendix A of 40 CFR 60.
- b. **Diluent Monitor:** The oxygen (O₂) or carbon dioxide (CO₂) content of the flue gas shall be monitored at the location where NO_x is monitored to correct the measured emissions rates to 15% oxygen. If a CO₂ monitor

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

is installed, the oxygen content of the flue gas shall be calculated using F-factors that are appropriate for the fuel fired. Each monitor shall comply with the performance and quality assurance requirements of 40 CFR 75.

[Rules 62-4.070(3), 62-210.800, 62-212.400(BACT) and 62-297.520, F.A.C.]

Permit Revision Request #5: The applicant wanted to add a new subparagraph c. for Specific Condition 23 which states that substituted data and bias corrected data required for purposes of 40 CFR Part 75 are not to be used for purposes of demonstrating compliance with CEMS emission limits under this permit. The applicant indicated that the following language in Specific Condition 23.c. should be added:

“For purposes of determining compliance with the CEMS emissions standards of the permit, missing or excluded data shall not be substituted and bias corrected data shall not be used.”

Department’s Response for Request #5: The Department concurs with the request and will add Specific Condition 23.c., which will read as follows:

CEM Systems: The permittee shall install, calibrate, maintain, and operate continuous emission monitoring systems (CEMS) to measure and record the emissions of NO_x from the combustion turbine in a manner sufficient to demonstrate continuous compliance with the CEMS emission standards of this section. All continuous monitoring systems shall be installed and functioning within the required performance specification by the time of the initial performance tests.

- a. **NO_x Monitor:** Each NO_x monitor shall be certified pursuant to the specifications of 40 CFR 75 and comply with the applicable requirements of 40 CFR 60 Subpart KKKK. Quality assurance procedures shall conform to the requirements of 40 CFR 75. The ~~annual and required~~ RATA tests required for the NO_x monitor shall be performed using EPA Method 20 or 7E in Appendix A of 40 CFR 60.
- b. **Diluent Monitor:** The oxygen (O₂) or carbon dioxide (CO₂) content of the flue gas shall be monitored at the location where NO_x is monitored to correct the measured emissions rates to 15% oxygen. If a CO₂ monitor is installed, the oxygen content of the flue gas shall be calculated using F-factors that are appropriate for the fuel fired. Each monitor shall comply with the performance and quality assurance requirements of 40 CFR 75.
- c. For purposes of determining compliance with the CEMS emissions standards of the permit, missing or excluded data shall not be substituted and bias corrected data shall not be used.

[Rules 62-4.070(3), 62-210.800, 62-212.400(BACT) and 62-297.520, F.A.C.]

Permit Revision Request #6: The applicant requested to add the following language in Specific Condition 23.b. to clarify that the use of diluent cap is allowed:

“For any hour in which the hourly average O₂ concentration exceeds 19.0 percent (or the hourly average CO₂ concentration is less than 1.0 percent CO₂), a diluent cap value of 19.0 percent O₂ or 1.0 percent CO₂ (as applicable) may be used in the emission calculations.”

Department’s Response for Request #6: 40 CFR 60.4350 (Subpart KKKK) allows the use of diluent cap. Therefore, the Department will add the language of diluent cap as requested by the applicant. Specific Condition 23.b. will read as follows:

“**Diluent Monitor:** The oxygen (O₂) or carbon dioxide (CO₂) content of the flue gas shall be monitored at the location where NO_x is monitored to correct the measured emission rates to 15% oxygen. If a CO₂ monitor is installed, the oxygen content of the flue gas shall be calculated using F-factors that are appropriate for the fuel fired. Each monitor shall comply with the performance and quality assurance requirements of 40 CFR 75. For any hour in which the hourly average O₂ concentration exceeds 19.0 percent (or the hourly average CO₂ concentration is less than 1.0 percent CO₂), a diluent cap value of 19.0 percent O₂ or 1.0 percent CO₂ (as applicable) may be used in the emission calculations.”

[Rules 62-4.070(3), 62-210.800, 62-212.400(BACT), and 62-297.520, F.A.C. and 40 CFR 60.4350]

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Permit Revision Request #7: The applicant requested that it be allowed ten (10) calendar days after the end of each calendar month to complete the monthly fuel logs required under Specific Condition 25. The current requirement is to record and calculate the monthly operational data within five (5) calendar days.

Department's Response for Request #7: Based on the requirements of some of the current permits issued by the Department, the applicant will be given fifteen (15) calendar days after the end of each calendar month to record and calculate the monthly operational data. This will provide consistency between the Department permits. Therefore, Specific Condition 25 will read as follows:

Monthly Operations Summary: By the ~~fifth~~ 15th calendar day of each month, the permittee shall record the following for each fuel in a written or electronic log for the combustion turbine for the previous month of operation: hours of operation for the month and for the rolling 12-month total. Information recorded and stored as an electronic file shall be available for inspection and printing within at least three days of a request by the Department. The fuel consumption shall be monitored in accordance with the provisions of 40 CFR 75 Appendix D.

[Rules 62-4.070(3) and 62-212.400(PSD), F.A.C.]

D. Processing Schedule

07-11-08: Received the application for a minor source air pollution construction permit. Application complete.

II. APPLICABLE REGULATIONS

State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code.

<u>Chapter</u>	<u>Description</u>
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
62-210	Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review, PSD Review and BACT, and Non-attainment Area Review and LAER
62-213	Title V Air Operation Permits for Major Sources of Air Pollution
62-296	Emission Limiting Standards
62-297	Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures

Federal Regulations

The Environmental Protection Agency establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 identifies New Source Performance Standards (NSPS) for a variety of industrial activities. The new combustion turbine (CT No. 8) will be subject to 40 CFR 60, Subpart A: General Provisions for NSPS Sources and 40 CFR 60, Subpart KKKK: Standards of Performance for Stationary Combustion Turbines for which Construction is Commenced after February 18, 2005.

General PSD Applicability

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The Department regulates major air pollution sources in accordance with Florida's PSD program, as approved by the EPA in Florida's State Implementation Plan and defined in Rule 62-212.400, F.A.C. A PSD review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant, or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories [Rule 62-210.200(Major Stationary Source), F.A.C.], or
- 5 tons per year of lead.

For new projects at PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the "Significant Emission Rates" listed in Rule 62-210.200, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability for Project

A PSD permit was issued in 2007 for the simple cycle CT No. 8 construction project that is nearing completion. No changes in permitted emissions, production or fuel use limitations are requested.

The key definition of "major source modification" is given at Rule 62-210.200 (192), F.A.C. as follows:

- (a) Any physical change in or change in the method of operation of a major stationary source that would result in a significant emissions increase of a PSD pollutant and a significant net emissions increase of that pollutant from the major stationary source.

For emissions units (such as CT No. 8) that have not begun normal operations, actual emissions are defined as follows per Rule 62-210.200 (11):

- (c) For any emissions unit that has not begun normal operations on a particular date, actual emissions shall equal the potential emissions of the emissions unit on that date.

JEA believes that CT No. 8 will comply with the present emission limits of the project. Because actual emissions equal the potential emissions from CT No. 8 and also equal the permitted emissions from CT No. 8, there will not be a significant net emission increase of pollutants. Therefore PSD does not apply to this project.

III. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Syed Arif is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT

Month Day, 2008

Sent by Electronic Mail – Received Receipt Requested

Mr. James M. Chansler, P.E., D.P.A.
Chief Operating Officer, JEA
21 West Church Street
Jacksonville, Florida 32202

Re: DEP File No. 0310047-018-AC; PSD-FL-386A
Kennedy Generating Station – Combustion Turbine No. 8

Dear Mr. Chansler:

The Department received your request to modify the current construction permit for Combustion Turbine (CT) No. 8 (Emission Unit No. 016) at the Kennedy Generating Station. The ongoing combustion turbine project was approved under permit PSD-FL-386 (DEP File 0310047-015-AC). CT No. 8 is a General Electric PG7241(FA) simple cycle combustion turbine generator with a nominal output of 172 megawatt.

Based on the above and as explained in the technical evaluation and preliminary determination, the Department will modify PSD-FL-386, previously issued on May 4, 2007, as follows. Please note that double underlined words are additions and strikethrough words are deletions.

I. The expiration date of the construction permit is extended from December 31, 2008 to December 31, 2009.

II. The following Section 3 Specific Conditions of the construction permit PSD-FL-386 will be modified:

12. Emission Standards: Emissions from each combustion turbine shall not exceed the following emissions standards.

Pollutant	Emission Standard ^e	Averaging Time	Compliance Method	Basis
CO ^a (Gas)	9.0 ppmvd @ 15% O ₂	3-hour test avg.	EPA Method 10 Test	Avoid PSD
	32.0 lb/hour			
CO ^a (Oil)	20.0 ppmvd @ 15% O ₂	3-hour test avg.	EPA Method 10 Test	
	66.0 lb/hour			
NOx ^b (Gas)	15.0 ppmvd @ 15% O ₂	4 hour rolling average	CEMS	Avoid PSD
	108.3 lb/hour	3-hour test avg.	CEMS and EPA Method 19	Avoid PSD

Pollutant	Emission Standard ^e	Averaging Time	Compliance Method	Basis
NO _x ^b (Oil)	42 ppmvd @ 15% O ₂	4 hour rolling average	CEMS	Avoid PSD
	335.0 lb/hour	3-hour test avg.	CEMS and EPA Method 19	
PM/PM ₁₀ ^c	10% Opacity	6-minute block	EPA Method 9 Test	BACT
	Fuel sulfur specifications	N/A	Record Keeping	
SO ₂ ^d (Gas)	2 grains S/100 SCF of gas	N/A	Record Keeping	Avoid PSD
SO ₂ ^d (Oil)	0.05% sulfur by weight	N/A	Record Keeping	Avoid PSD

- a. The permittee shall conduct an initial test to demonstrate compliance with the CO emissions limits for the unit as constructed. Subsequent compliance tests shall be conducted during the year prior to renewing the Title V operating permit.
- b. Continuous compliance shall be demonstrated with the 4-hour rolling average NO_x emissions limit (ppmvd @ 15% O₂) by data collected from the required continuous emissions monitoring system (CEMS). If the CEMS data indicates that the 4-hour rolling average is in excess of the emission limit, excess emission reports must be filed. Compliance with the NO_x emissions limit (lb/hr) shall be demonstrated only during the initial compliance test by converting the NO_x CEMS data collected during the initial CO test by using the applicable F-Factor and EPA Method 19.
- c. The fuel sulfur specifications combined with the efficient combustion design and operation of the combustion turbine represents BACT for PM/PM₁₀ emissions. No stack tests are required. Compliance with the CO and visible emissions standards shall serve as indicators of good combustion. *{Permitting Note: Maximum expected PM/PM₁₀ emissions are approximately 19 lb/hour on natural gas and 45.0 lb/hr on oil.}*
- d. The fuel sulfur specifications effectively limit the potential emissions of sulfur dioxide (SO₂) from each combustion turbine. No stack tests are required.
- e. The mass emission rate standards are based on a turbine inlet condition of 59° F and the higher heating value of each fuel. Mass emission rates may be adjusted for actual test conditions in accordance with the performance curves and/or equations on file with the Department.

[Rule 62-212.400 (BACT), F.A.C.; Rule 62-4.070(3), F.A.C.]

23. CEM Systems: The permittee shall install, calibrate, maintain, and operate continuous emission monitoring systems (CEMS) to measure and record the emissions of NO_x from the combustion turbine in a manner sufficient to demonstrate continuous compliance with the CEMS emission standards of this section. All continuous monitoring systems shall be installed and functioning within the required performance specification by the time of the initial performance tests.
 - a. *NO_x Monitor*: Each NO_x monitor shall be certified pursuant to the specifications of 40 CFR 75 and comply with the applicable requirements of 40 CFR 60 Subpart KKKK. Quality assurance procedures shall conform to the requirements of 40 CFR 75. The ~~annual~~

~~and required~~ RATA tests required for the NO_x monitor shall be performed using EPA Method 20 or 7E in Appendix A of 40 CFR 60.

- b. *Diluent Monitor*: The oxygen (O₂) or carbon dioxide (CO₂) content of the flue gas shall be monitored at the location where NO_x is monitored to correct the measured emissions rates to 15% oxygen. If a CO₂ monitor is installed, the oxygen content of the flue gas shall be calculated using F-factors that are appropriate for the fuel fired. Each monitor shall comply with the performance and quality assurance requirements of 40 CFR 75. For any hour in which the hourly average O₂ concentration exceeds 19.0 percent O₂ (or the hourly average CO₂ concentration is less than 1.0 percent CO₂), a diluent cap value of 19.0 percent O₂ or 1.0 percent CO₂ (as applicable) may be used in the emission calculations.
- c. For purposes of determining compliance with the CEMS emissions standards of the permit, missing or excluded data shall not be substituted and bias corrected data shall not be used.

[Rules 62-4.070(3), 62-210.800, 62-212.400(BACT), ~~and~~ 62-297.520, F.A.C. and 40 CFR 60.4350]

25. Monthly Operations Summary: By the ~~fifth~~ 15th calendar day of each month, the permittee shall record the following for each fuel in a written or electronic log for the combustion turbine for the previous month of operation: hours of operation for the month and for the rolling 12-month total. Information recorded and stored as an electronic file shall be available for inspection and printing within at least three days of a request by the Department. The fuel consumption shall be monitored in accordance with the provisions of 40 CFR 75 Appendix D.

[Rules 62-4.070(3) and 62-212.400(PSD), F.A.C.]

29. NSPS Emissions Reports

- a. NSPS Emissions Report: Within thirty (30) days following each calendar semiannual period, the permittee shall submit a report including any applicable periods of excess emissions and monitoring systems performance as defined in 40 CFR 60, Subpart KKKK (Standards of Performance for Stationary Combustion Turbines) that occurred during the previous semiannual period to the Compliance Authority.
- b. Malfunction Notification: For each malfunction resulting in excess emissions that exceed two hours in any 24 hour period, the permittee shall notify the Compliance Authority within one 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 Compliance Authority may request a written summary report of the incident.

[Rules 62-4.070(3), 62-4.130, 62-204.800, 62-210.700(6) and 62-212.400(BACT), F.A.C.; and 40 CFR 60.7 and 60.4395]

A copy of this letter and attachments shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Joseph Kahn, Director
Division of Air Resource Management

Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that either this Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination, and the Draft Modification Letter) or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on _____ to the persons listed below.

Mr. James M. Chansler, P.E., D.P.A., JEA (chanjm@jea.com)
Mr. Bert Gianazza, P.E., JEA (giannb@jea.com)
Mr. Chris Kirts, DEP-NED (christopher.kirts@dep.state.fl.us)
Mr. Richard Robinson, P.E., EQD (robinson@coj.net)
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
Mr. Dee Morse, NPS (dee_morse@nps.gov)

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.

(Clerk)

(Date)

Livingston, Sylvania

From: Chansler, James M. - Chief Operating Officer [ChanJM@jea.com]
Sent: Monday, September 08, 2008 8:50 AM
To: Livingston, Sylvania
Subject: RE: Re-Posting - JEA-Kennedy Generating Station; 0310047-018-AC (PSD-FL-386A)

Thanks. -James

James M. Chansler, P.E., D.P.A.
Chief Operating Officer
JEA
(904) 665-4433

From: Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, September 04, 2008 10:58 AM
To: Chansler, James M. - Chief Operating Officer; Gianazza, N. Bert
Cc: Kirts, Christopher; robinson@coj.net; forney.kathleen@epa.gov; dee_morse@nps.gov; Arif, Syed; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Re-Posting - JEA-Kennedy Generating Station; 0310047-018-AC (PSD-FL-386A)

Dear Sir/Madam:

Click on the link to the documents displayed below and send a "reply" message verifying receipt of the document(s) provided in this email; 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 reply will preclude subsequent e-mail transmissions to verify receipt 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/0310047.018.AC.D_pdf.zip (This file was reposted to the website due to inadvertently posting the incorrect documents. Please confirm receipt of the zipped documents.

This is the official notification of the **Draft Permit** and its associated documents for the following project:

Owner/Company Name: JEA
Facility Name: Kennedy Generating Station
Project Number: 0310047-018-AC (PSD-FL-386A)
Permit Status: Draft
Permit Activity: Construction/ Modifications to PSD-FL-386/0310047-015
Facility County: Duval
Processor: Syed Arif

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 <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

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

9/10/2008

Livingston, Sylvia

From: Gianazza, N. Bert [GianNB@jea.com]
To: Livingston, Sylvia
Sent: Monday, September 08, 2008 10:35 AM
Subject: Read: Re-Posting - JEA-Kennedy Generating Station; 0310047-018-AC (PSD-FL-386A)

Your message

To: GianNB@jea.com
Subject:

was read on 9/8/2008 10:35 AM.

Livingston, Sylvia

From: Kirts, Christopher
To: Livingston, Sylvia
Sent: Tuesday, September 09, 2008 2:59 PM
Subject: Read: Re-Posting - JEA-Kennedy Generating Station; 0310047-018-AC (PSD-FL-386A)

Your message

To: 'chanjm@jea.com'; 'giannb@jea.com'
Cc: Kirts, Christopher; 'Rich Robinson (robinson@coj.net)'; 'forney.kathleen@epa.gov'; 'dee_morse@nps.gov'; Arif, Syed; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Re-Posting - JEA-Kennedy Generating Station; 0310047-018-AC (PSD-FL-386A)
Sent: 9/4/2008 10:58 AM

was read on 9/9/2008 2:59 PM.

Livingston, Sylvia

From: Dee_Morse@nps.gov
Sent: Thursday, September 04, 2008 3:37 PM
To: Livingston, Sylvia
Subject: Re: Re-Posting - JEA-Kennedy Generating Station; 0310047-018-AC (PSD-FL-386A)

message received

Dee Morse
Environmental Protection Specialist
Air Resources Division
Natural Resource Program Center
National Park Service
Phone: 303 969-2817
Fax: 303 969-2822
e-mail: dee_morse@nps.gov

"Livingston,
Sylvia"
<Sylvia.Livingsto
n@dep.state.fl.us
>

09/04/2008 10:58
AM AST

<chanjm@jea.com>, <giannb@jea.com>
To
cc

"Kirts, Christopher"
<Christopher.Kirts@dep.state.fl.us>
, <robinson@coj.net>,
<forney.kathleen@epa.gov>,
<dee_morse@nps.gov>, "Arif, Syed"
<Syed.Arif@dep.state.fl.us>,
"Walker, Elizabeth \ (AIR\)"
<Elizabeth.Walker@dep.state.fl.us>,
"Gibson, Victoria"
<Victoria.Gibson@dep.state.fl.us>

Subject
Re-Posting - JEA-Kennedy Generating
Station; 0310047-018-AC
(PSD-FL-386A)

Dear Sir/Madam:

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

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0310047.018.AC.D_pdf.zip
(This file was reposted to the website due to inadvertently posting the incorrect documents. Please confirm receipt of the zipped documents.)

Livingston, Sylvia

From: Arif, Syed
To: Livingston, Sylvia
Sent: Thursday, September 04, 2008 11:01 AM
Subject: Read: Re-Posting - JEA-Kennedy Generating Station; 0310047-018-AC (PSD-FL-386A)

Your message

To: 'chanjm@jea.com'; 'giannb@jea.com'
Cc: Kirts, Christopher; 'Rich Robinson (robinson@coj.net)'; 'fomey.kathleen@epa.gov'; 'dee_morse@nps.gov'; Arif, Syed; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Re-Posting - JEA-Kennedy Generating Station; 0310047-018-AC (PSD-FL-386A)
Sent: 9/4/2008 10:58 AM

was read on 9/4/2008 11:01 AM.

His zip is unzipped file from previously existing files & thus saved previous files to his computer. That is the reason he sees two projects.

Livingston, Sylvia

From: Robinson, Richard [ROBINSON@coj.net]
Sent: Monday, September 15, 2008 7:35 AM
To: Livingston, Sylvia
Subject: RE: Re-Posting - JEA-Kennedy Generating Station; 0310047-018-AC (PSD-FL-386A)

Sylvia

Sylvia,


The link in your 9/4 e-mail below, links me to a zip file that contains both projects.

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

Please note: that under Florida's very broad public records law, e-mail communications to and from City officials may be subject to public disclosure.

 Please consider the environment before printing this email.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, September 11, 2008 5:21 PM
To: Robinson, Richard
Subject: RE: Re-Posting - JEA-Kennedy Generating Station; 0310047-018-AC (PSD-FL-386A)

Richard,

I check the zip file and didn't see OUC project. Could you still be looking at the previous zipped document?

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-0771 (temp)
GIC 713
sylvia.livingston@dep.state.fl.us

From: Robinson, Richard [mailto:ROBINSON@coj.net]
Sent: Thursday, September 11, 2008 7:22 AM
To: Livingston, Sylvia

9/17/2008

Subject: RE: Re-Posting - JEA-Kennedy Generating Station; 0310047-018-AC (PSD-FL-386A)

Good Morning Sylvia,

Yes, I was able to access the JEA Kennedy Generating Station; 0310047-018-AC, project. FYI, the Orlando Utilities project is part of the same zip file.

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: Wednesday, September 10, 2008 5:31 PM
To: Robinson, Richard
Subject: FW: Re-Posting - JEA-Kennedy Generating Station; 0310047-018-AC (PSD-FL-386A)

Rich,

I haven't received a response from you as to whether you received this document. Were you able to access the correct project?

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-0771 (temp)
GIC 713
sylvia.livingston@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Livingston, Sylvia

9/17/2008

Sent: Thursday, September 04, 2008 10:58 AM

To: 'chanjm@jea.com'; 'giannb@jea.com'

Cc: Kirts, Christopher; 'Rich Robinson (robinson@coj.net)'; 'forney.kathleen@epa.gov'; 'dee_morse@nps.gov'; Arif, Syed; Walker, Elizabeth (AIR); Gibson, Victoria

Subject: Re-Posting - JEA-Kennedy Generating Station; 0310047-018-AC (PSD-FL-386A)

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This is the official notification of the **Draft Permit** and its associated documents for the following project:

Owner/Company Name: JEA

Facility Name: Kennedy Generating Station

Project Number: 0310047-018-AC (PSD-FL-386A)

Permit Status: Draft

Permit Activity: Construction/ Modifications to PSD-FL-386/0310047-015

Facility County: Duval

Processor: Syed Arif

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