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Jacksonville, Florida 32202-3139

January 13, 2010



Mr. Tom Cascio, D.B.A., CPM
Engineering Specialist IV
Title V Section
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

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BUREAU OF AIR REGULATION

E L E C T R I C

W A T E R

S E W E R

RE: Kennedy Generating Station
Title V Air Operation Permit
Draft/Proposed Permit Revision
Permit No. 0310047-020-AV

Dear Mr. Cascio:

On December 9, 2009, JEA received a draft/proposed permit revision for the Title V Air Operation Permit applicable to the Kennedy Generating Station (Permit No. 0310047-020-AV). This permit revision incorporates the air construction permit requirements associated with the installation of a combustion turbine, referred to as Unit No. 8 (PSD-FL-386, 386A, and 386B). While the draft/proposed Title V permit conditions are largely consistent with the underlying construction permit requirements, we noted some differences and respectfully request that some minor changes be made to the Title V permit prior to final issuance. The specific changes being requested, along with an explanation as to why these changes are important to JEA, are as follows:

1. **DLN System.** Draft/Proposed Condition C.5 regarding the "DLN" combustion system requires that JEA operate and maintain a "DLN 2.6 system." The air construction permit, however, allowed JEA to operate and maintain a DLN 2.6 system "(or better)." JEA requests that Condition C.B. be revised to include the parenthetical allowing a better DLN system to be used and not limiting the system to only a 2.6 system. Because this unit is expected to be operated for thirty or more years, JEA expects that better systems will be available in the future, and at some point the 2.6 system may become outdated. This change in the permit language would give JEA the flexibility to ensure that the system is appropriately maintained and allow updated equipment to be used.

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2. **NOx Limit.** The Draft/Proposed Condition C.12 includes the 3-hour pound-per-hour limits for nitrogen oxides, consistent with the construction permit, but omits the language that had been included in footnote "b" in the air construction permit specifying when and how compliance with the pound-per-hour limits is to be demonstrated. Footnote "b" in the air construction permit included the following sentence which should be repeated in the Title V permit: "Compliance with the NOx emissions limit (lb/hr) shall be demonstrated by converting the NOx CEMS data collected during the initial CO test by using the applicable F-Factor and EPA Method 19." This provision from the construction permit makes it clear that compliance with the 3-hour limit was required only during the initial testing and not on a continuous or annual basis. This sentence should therefore be included in the Title V permit as well, as part of footnote b of Condition C.12.

JEA appreciates your consideration of these suggested changes to the Title V permit. We will be contacting you within the next few days for further discussions in an effort to resolve our concerns so that the final permit can be issued. If you have any questions or would like any further information regarding the issues we have raised, please contact Bert Gianazza at 904-665-6247.

Sincerely,



James M. Chansler, P.E., D.P.A.
Chief Operating Officer
Responsible Official



cc : Trina Vielhauer, DEP
Jonathan Holtom, DEP
Ronni Moore, DEP OGC