

Florida Department of  
Environmental Protection

Memorandum

TO: Howard L. Rhodes  
THRU: C. H. Fancy *CHF*  
A. A. Linero *aal*  
FROM: Teresa M. Heron *T.H.*  
DATE: March 5, 1999  
SUBJECT: JEA Kennedy Generating Station 170 MW Combustion Turbine  
DEP File No. 0310047-002-AC

*BAR*  
**RECEIVED**

MAR 08 1999

BUREAU OF  
AIR REGULATION

Attached is the final permit package for this project. The application is for installation of a nominal 170 megawatt (MW) natural gas and No. 2 fuel oil-fired combustion turbine-electrical generator. The new unit will operate in simple cycle and intermittent duty. Hours of operation will be limited to 4050 hours on natural gas or 1260 hours on fuel oil. It will replace a conventional natural gas and fuel oil-fired conventional steam generator at the Kennedy Generating Station.

The project netted out of PSD and no BACT was required. Nitrogen Oxides (NO<sub>x</sub>) emissions will be controlled by Dry Low NO<sub>x</sub> (DLN-2.6) combustors tuned to achieve 15 parts per million (ppm) by volume at 15 percent oxygen. NO<sub>x</sub> emissions will be 42 ppm while firing No. 2 fuel oil. Emissions of carbon monoxide (CO) will be controlled to 15 ppm (gas) 20 ppm (oil), while emissions of volatile organic compounds (VOC) will be less than 1.4 ppm (gas) and 3.5ppm (oil). Emissions of sulfur dioxide (SO<sub>2</sub>), sulfuric acid mist (SAM), and particulate matter (PM/PM<sub>10</sub>) will be low due to use of clean fuels and the limited hours of operation.

We recommend your approval.

AAL/th

Attachments

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF PERMIT

In the Matter of an  
Application for Permit by:


Mr. Walter P. Bussels, Managing Director and CEO  
Jacksonville Electric Authority  
21 West Church Street  
Jacksonville, Florida 32202-3139

DEP File No. 0310047-002-AC  
170 MW Combustion Turbine Project  
Simple Cycle Peaking Unit  
Duval County

Enclosed is the Final Permit Number 0310047-002-AC for an air construction permit to construct/install a nominal 170 megawatt natural gas and No. 2 fuel oil-fired 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. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 3-8-99 to the person(s) listed:

Walter P. Bussels, JEA\*  
Bert Gianazza, JEA  
Chris Kurts, NED  
James L. Manning, P.E. RESD  
Gregg Worley, EPA  
John Bunyak, NPS  
Anthony L. Compaan, P.E., Black & Veatch

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

  
(Clerk) 3-8-99  
(Date)

## FINAL DETERMINATION

Jacksonville Electric Authority (JEA))  
Kennedy Generating Station  
170 MW Simple Cycle Combustion Turbine  
DEP File No: 0310047-002-AC

An Intent to Issue an air construction permit, authorizing the construction of a 170 MW natural gas and fuel oil-fired simple cycle combustion turbine to Jacksonville Electric Authority (JEA) was distributed on January 29, 1999. This facility is located at the Kennedy Generating Station, in Jacksonville, Duval County, Florida.

The Public Notice of Intent to Issue Air Construction Permit was published in The Florida Times-Union on February 4, 1999. On February 12, a Request for Extension of Time to File a Petition for Administrative Proceedings was received from JEA. Accordingly, the Office of General Counsel initiated Case No. 99-0251 and advised that the application was "locked" from further updates until the case is resolved. On March 5, 1999, JEA and the Department agreed that all matters are resolved and JEA will file a request to withdraw the extension with the final permit as an attachment.

No comments were received following the public notice with the exception of comments received from JEA on February 17. JEA's written comments and the Department's responses follow. JEA commented only on the draft permit and not on the Technical Evaluation and Preliminary Determination. JEA's comments are keyed to the draft permit and to the Specific Conditions contained therein.

- 1. Section III, Condition 17. NO<sub>x</sub> Emissions. Since this unit will be required to comply with a 15 ppm NO<sub>x</sub> limit (42 ppm on oil) as well as a ton per year limit, JEA requests that the lb/hr limit be removed. Also, that the total annual NO<sub>x</sub> emission limit of 200 tons per year should be on a 12-month rolling average basis. To preserve JEA's option to use the protocol under 40 CFR Appendix E for the determination of compliance with the NO<sub>x</sub> limits, JEA requests adding the following language at the end of Conditions 17 and 27: "In lieu of utilizing CEMs for NO<sub>x</sub>, the permittee may elect to utilize the protocol specified under 40 CFR Part 75, Appendix E."*

The Department will modify this condition to reflect a 12-month rolling average. The lb/hr limit will not be removed. Stack testing is only required initially to verify compliance with permit limits including the lb/hr proposed (refer to Comment 3 below). The request to utilize the protocol specified under 40 CFR Part 75, Appendix E, is acceptable as long as the applicability requirements of this Appendix E are met. The key requirement is that the unit must meet the definition of peaking unit as stated in 40 CFR 72.2 Definitions. Appendix E applicability requirements reads as follows: "This NO<sub>x</sub> emissions estimation procedure may be used in lieu of a continuous NO<sub>x</sub> emission monitoring system (lb/MMBtu) for determining the average NO<sub>x</sub> emission rate and hourly NO<sub>x</sub> rate from the gas-firing peaking unit and oil-fired peaking unit as defined in Section 72.2 of this chapter. If a unit's operations exceed the levels required to be a peaking unit, install and certify a continuous NO<sub>x</sub> emission monitoring system no later than December 31 of the following calendar year. The provisions of Section 75.12 apply to excepted monitoring systems under this appendix."

2. Specific Condition 18. Visible Emissions. *JEA requests that 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%."*

The particulate emissions rate of 17 lb/hour and the VOC concentration of 3.5 ppm while firing maximum 0.05 % sulfur fuel oil, suggests the expectation of low opacity. Because only initial VOC testing and no particulate testing were going to be required, it was important to set opacity limits representative of the low emissions for the mentioned parameters. Ten percent opacity is the Department's reasonable assurance pursuant to Rule 62-4.070, F.A.C. that the unit will comply with the permit conditions and not trigger PSD during operation on oil. There is no reason to expect a 20% opacity plume from a clean unit. In lieu of the 10 percent limit on oil, the Department will require annual demonstration that the unit will meet the particulate emission limit of 17 pounds per hour which JEA determined would allow the project to "net out" of PSD review for particulate matter. Subsequently, JEA may accept a 10 percent opacity limit and be relieved of an annual testing requirement.

3. Specific Condition 19: *JEA requests 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.*

According to EPA (EPA's letter of May 21, 1998, comments to the Lakeland Unit 5 project), "to ensure that a PSD permit is practically enforceable, short-term BACT emission limits need to be provided in the PSD permit as opposed to 'ton/year' limits." Although this project did not go through PSD and BACT review, this comment is still valid since this project nets out of review and the lb/hr limit and hour of operations are crucial parameters for the determination of a project PSD applicability (in tons per year).

The short term emission limit for this emission unit is to provide reasonable assurance that the TPY limit will not be exceeded and to ensure that the non-PSD status of the permit is practically enforceable. This condition will not be changed. If JEA wishes to add a continuous monitor to log long-term emissions of CO, the permit can be subsequently modified.

4. Specific Condition 21. *JEA requests that the pound per hour limits for SO<sub>2</sub> 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. . . ."*

Refer to the non- PSD applicability rationale discussed in Comment 3 above. Regarding the typographical error, this will be corrected in the final permit.

5. Specific Condition 28. *JEA states that 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 \_\_\_\_\_."*

The Department agrees with the applicant that Rule 62-297.340, F.A.C was repealed. In reality, this rule was transferred to Rule 62-297.310 (7) F.A.C. Frequency of Compliance Tests. This condition will reflect the correct citation in the final permit.

6. Specific Condition 36. JEA states that this condition is redundant to Condition 34 and therefore these two conditions should be consolidated for clarity.

The Department agrees with the applicant. This condition is modified as follows:

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.

7. Specific Condition 37, line 4. JEA suggests that in order to clarify that the excess emissions condition applies to NO<sub>x</sub>, please reference condition 22.

The Department believes that this condition is clear, therefore, this condition will not be revised. The NO<sub>x</sub> emission limits are as stated in Specific Conditions No. 16 and 17. This specific condition (37) clearly states: "Periods when NO<sub>x</sub> emissions ( ppmvd at 15% oxygen) are above the standards...."

8. Specific Condition 39. JEA affirms that this Condition is nearly identical to Condition 38 and therefore these two conditions should be consolidated for clarity.

The Department agrees with JEA. This condition would be modified as follows:

CEMS in lieu of the requirement for reporting excess emissions: Subject to EPA approval, the NO<sub>x</sub> CEMS shall be used in lieu of the requirement for reporting excess emissions in accordance with 40 CFR 60.334(e)(1), Subpart GG (1997 version). Upon request from DEP, the CEMS emission rates for NO<sub>x</sub> on this CT shall be corrected to ISO conditions to demonstrate compliance with the NO<sub>x</sub> standard established in 40 CFR 60.332. This unit shall comply with the CEM frequency data report as specified in 40CFR60.7 (c). [Rule 62-204.800(7) and 40 CFR60.7]

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

The statement reads as follows: "This unit shall be monitored for SO<sub>2</sub> using methods consistent with the statements of 40CFR75.11 and certified by the USEPA."

This statement means using methods consistent with the acid rain program (40 CFR Part 75) and that the monitoring system shall be certified by the US EPA Acid Rain Division.

The final action of the Department will be to issue the permit with the changes noted above.



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

## 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<sub>x</sub> (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<sub>x</sub> (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:

ARMS Emissions Unit No.	System	Emission Unit Description
015	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/PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), 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

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### PERMIT SCHEDULE

- 02/04/99 Notice of Intent published in the Florida Times-Union
- 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.
- JEA's comments to DEP incompleteness letter dated December 23, 1998 and January 19, 1999.
- EPA's approval of the Custom Fuel Monitoring Schedule dated February 10, 1999.
- JEA's request for Extension of Time to File a Petition for Administrative Proceedings dated February 12, 1999.
- JEA's comments to the draft permit and technical evaluation dated February 17, 1999.



# AIR CONSTRUCTION PERMIT 0310047-002-AC

## SECTION II. EMISSION UNIT(S) ADMINISTRATIVE REQUIREMENTS

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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 Blainstone 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 (RESO) 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

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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

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### 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 015, 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

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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<sub>x</sub> (DLN) combustor shall be installed on this stationary combustion turbine to control nitrogen oxides (NO<sub>x</sub>) 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<sub>x</sub> 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<sub>x</sub> emissions. [Design, Rules 62-4.070 and 62-212.400, F.A.C.]

# AIR CONSTRUCTION PERMIT 0310047-002-AC

## 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<sub>x</sub> are at 15% O<sub>2</sub> 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 <sub>x</sub>	SO <sub>2</sub>	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 <sub>x</sub> 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<sub>x</sub>) Emissions:

- The concentration of NO<sub>x</sub> concentrations in the exhaust gas of this CT shall not exceed 15 ppm at 15% O<sub>2</sub> (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<sub>x</sub> emissions calculated as NO<sub>2</sub> (at ISO conditions) shall exceed neither 15 ppm at 15% O<sub>2</sub> nor 99 lb/hr to be demonstrated by stack test. Total annual NO<sub>x</sub> emissions shall not exceed 200 tons on a 12-month rolling average basis (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<sub>x</sub> concentrations in the exhaust gas of this CT shall not exceed 42 ppm at 15% O<sub>2</sub> (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<sub>x</sub> emissions calculated as NO<sub>2</sub> (at ISO conditions) shall exceed neither 42 ppm at 15% O<sub>2</sub> nor 318 lb/hr to be demonstrated by stack test. Total annual NO<sub>x</sub> emissions shall not exceed 200 tons on a 12-month rolling average basis (gas/oil or gas or oil). [Rules 62-4.070 and 62-212.400, F.A.C. to avoid PSD Review]
  - When NO<sub>x</sub> 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.
  - In lieu of utilizing CEMs, for NO<sub>x</sub>, the permittee may elect to utilize the protocol specified under 40 CFR Part 75, Appendix E. [Rule 62-204.800 F.A.C., 40CFR72.2 and 40CFR75 Appendix E]
18. Visible Emissions (VE): In lieu of a particulate emission limit, VE emissions shall not exceed 10 percent opacity while burning natural gas. VE emissions shall not exceed 20 percent opacity and particulate emissions shall not exceed 17 lb/hr (non-condensable only) while burning oil during initial and annual tests. The permittee may request substitution of the PM limit and test requirement by a 10 percent opacity limitation while burning oil. [Rules 62-296.320 and 62-4.070(3) F.A.C.]

# AIR CONSTRUCTION PERMIT 0310047-002-AC

## SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

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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 ppmvd (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).
21. Sulfur Dioxide (SO<sub>2</sub>) emissions: SO<sub>2</sub> 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 SO<sub>2</sub> 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 SO<sub>2</sub>. Emissions of SO<sub>2</sub> 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)].

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## SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

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### 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.
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 5 or 17, "Determination of Particulate Emissions from Stationary Sources" (I, A).
  - 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<sub>x</sub> emission limits: Continuous compliance with the NO<sub>x</sub> 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<sub>x</sub> 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 SO<sub>2</sub> and PM/PM<sub>10</sub> emission limits: Notwithstanding the requirements of Rule 62-297.310(7), 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 SO<sub>2</sub> and PM<sub>10</sub>. For the purposes of demonstrating compliance with the 40 CFR 60.333 SO<sub>2</sub> standard and the 0.05% S limit, fuel oil analysis using ASTM D2880-71 or D4294

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### SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

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(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).

29. Compliance with CO emission limit: An initial test for CO, shall be conducted concurrently with the initial NO<sub>x</sub> test, as required. The initial NO<sub>x</sub> 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<sub>x</sub> 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.



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## SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

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### 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.
36. Emission Compliance Stack Test Reports: 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<sub>x</sub> 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<sub>x</sub> 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<sub>x</sub> CEMS. Upon request from DEP, the CEMS emission rates for NO<sub>x</sub> on this Unit shall be corrected to ISO conditions to demonstrate compliance with the NO<sub>x</sub> standard established in 40 CFR 60.332.
39. CEMS requirement for reporting excess emissions. This unit shall comply with the CEM frequency data report as specified in 40CFR60.7 (c). [Rule 62-204.800 and 40 CFR 60.7]
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):

# AIR CONSTRUCTION PERMIT 0310047-002-AC

## SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

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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 SO<sub>2</sub> 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, SO<sub>2</sub> 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.].

**APPENDIX GC**  
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

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- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- a) Have access to and copy and records that must be kept under the conditions of the permit;
  - b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- a) A description of and cause of non-compliance; and
  - b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

**APPENDIX GC**  
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

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The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- a) Determination of Best Available Control Technology ( )
  - b) Determination of Prevention of Significant Deterioration ( ); and
  - c) Compliance with New Source Performance Standards (X).
- G.14 The permittee shall comply with the following:
- a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c) Records of monitoring information shall include:
    - 1. The date, exact place, and time of sampling or measurements;
    - 2. The person responsible for performing the sampling or measurements;
    - 3. The dates analyses were performed;
    - 4. The person responsible for performing the analyses;
    - 5. The analytical techniques or methods used; and
    - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Is your RETURN ADDRESS completed on the reverse side?

<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, or 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.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Walter P Bussels, MO Jacksonville Electric 21 West Church St. Jacksonville, FL 32202-3139	4a. Article Number P265 659 432	4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
5. Received By: (Print Name)	7. Date of Delivery 3-12-99	
6. Signature: (Addressee or Agent) X <i>[Signature]</i>	8. Addressee's Address (Only if requested and fee is paid)	

Thank you for using Return Receipt Service.

P 265 659 432

US Postal Service  
**Receipt for Certified Mail**  
 No Insurance Coverage Provided.  
 Do not use for International Mail (See reverse)

Sent to	Walter Bussels
Street & Number	JEA
Post Office, State, & ZIP Code	Jacksonville, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	3-8-99
0310047-002-AC	

PS Form 3800, April 1995