

21 West Church Street
Jacksonville, Florida 32202-3139

RECEIVED

FEB 15 2001

BUREAU OF AIR REGULATION

February 13, 2001



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

ELECTRIC

WATER

SEWER

RE: Kennedy Generating Station Combustion Turbine CT 7
Air Construction Permit 0310047-002-AC
Title V Operating Permit 0310047-006-AV
Request for Permit Revision

Dear Mr. Fancy:

Per my conversation with Bruce Mitchell, please issue permit revisions to the above referenced permits changing Specific Condition 31 in the construction permit and Specific Condition D 24 in the Title V permit from requiring stack testing to be performed at 95-100% of capacity to requiring stack testing to be performed at 90-100% of capacity. It is my understanding that these revisions can be performed simultaneously to reduce processing time.

These revisions will make the specific conditions consistent with the new combustion turbine stack testing guidance DARM-OGG-07, "Guidance on Rate of Operation during Compliance Testing for Combustion Turbines" dated March 1, 2000.

If you have any questions with regard to this matter, please call me at (904) 665-6247.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Bert Gianazza'.

N. Bert Gianazza, P.E.
Environmental Permitting
& Compliance

cc: Bruce Mitchell, P.E., FDEP

Mitchell, Bruce

From: Richard Robinson [ROBINSON@coj.net]
Sent: Monday, March 26, 2001 2:50 PM
To: Mitchell, Bruce
Cc: Ron Roberson; Wayne Tutt; Wayne Walker; Jerry Woosley; Chris.Kirts@dep.state.fl.us
Subject: Draft JEA Kennedy AC & AV Permits

Bruce,

I took a quick look at the subject draft permit package and noticed that our agency address and phone number require updating. Please use the following mailing address and phone number:

City of Jacksonville
Regulatory and Environmental Services Department
Air and Water Quality Division
117 West Duval Street, Suite 225
Jacksonville, FL 32202
904-630-4900

The following are the 3 places I noticed where our address and phone number need updating: 1. Page 3 of the Public Notice, 2. Permit Cover Page, 3. Page 5, Section II, Facility-wide Condition 11. Please update prior to final issuance.

Thanks,
Richard

Mitchell, Bruce

To: Boutwell, Barbara
Cc: Fancy, Clair; Sheplak, Scott
Subject: Posting of PROPOSED Title V Permit package: JEA _ Kennedy Generating Station: 0310047-008-AV

5/9/2001

Dear Barbara,

Please post the above referenced permit package at:
o:\Bar\Title V\Bruce\Permits.0310047.007AC.008AV
Many thanks.

0310047P.008.FEDNO
T.doc

Bruce

Mitchell, Bruce

From: Boutwell, Barbara
Sent: Thursday, May 10, 2001 12:16 PM
To: Elizabeth Bartlett; Fillingim, Mary; Gracy Danois; Gregg Worley; Joel Huey; Walker, Elizabeth (AIR)
Cc: Mitchell, Bruce
Subject: New Posting #0310047

There is a new posting on Florida's website.

0310047008AV
JEA - KENNEDY

Proposed Permit Revision

If you have any questions, feel free to contact me.

Thanks,
Barbara

Mitchell, Bruce

To: Gianazza, N. Bert
Cc: Fancy, Clair; Sheplak, Scott
Subject: RE: DRAFT LETTER

5/18/2001

Dear Bert,

The draft letter looks fine. I had not seen your e-mail, dated 5/17/01, until after we had talked this morning about including a request to include the incorporation of the permit change made to S.C. #40 in 0310047-002-AC on 5/22/2000. So, if you would add the blurb regarding that permit change, I will make an Admin. Permit Correction to the Title V Permit first and then add the changes in the FINAL Title V Permit, 0310047-008-AV. Take care.

Bruce

-----Original Message-----

From: Gianazza, N. Bert [mailto:GianNB@jea.com]
Sent: Thursday, May 17, 2001 11:26 AM
To: Mitchell, Bruce
Subject: DRAFT LETTER

Bruce, for your review and comment prior to issuance.

Tx, Bert

<<Mitchell13.doc>>

Mitchell, Bruce

To: Boutwell, Barbara
Cc: Fancy, Clair; Sheplak, Scott
Subject: Posting of FINAL T-5 permit revision package: JEA_Kennedy Generating Station: 0310047-008-AV.

7/9/2001

Dear Barbara,

Please post the following FINAL T-5 permit revision package (0310047-008-AV), which can be found at:

o:Bar/Title V/Bruce/Permits/0310047.007AC.008AV

0310047.008AV.FD

0310047F.008AV

0310047.008AV.SOB

0310047G.008AV

0310047H.008AV

0310047U.008AV

Many thanks.

Bruce

Mitchell, Bruce

From: Boutwell, Barbara
Sent: Wednesday, July 11, 2001 9:05 AM
To: Elizabeth Bartlett; Gracy Danois; Gregg Worley; Joel Huey; Walker, Elizabeth (AIR)
Cc: Mitchell, Bruce
Subject: New Posting #0310047

There is a new posting on Florida's website.

0310047008AV
JEA - KENNEDY

Final Permit Revision

If you have any questions, feel free to contact me.

Thanks,
Barbara

Mitchell, Bruce

To: Zhu, Yi
Cc: Fancy, Clair; Sheplak, Scott
Subject: ARMS update for the JEA - Kennedy Generating Station's CT #7: 0310047-008-AV (Title V Revision permitting project)

7/11/2001

Dear Yi,

Please review the ARMS update for the above referenced permitting project (Title V Revision). Many thanks.

Bruce



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Sruhs
Secretary

DARM-OGG-07

SUBJECT: Guidance on Rate of Operation during Compliance
Testing for Combustion Turbines

DATE : March 1, 2000

This memo is to provide guidance on determining the rate of operation during compliance testing for combustion turbines (CTs).

The mass throughput rate of combustion turbines is inversely proportional to temperature and humidity measured at the CT inlet as a result of the changing air densities encountered. Inlet air temperature is the predominant factor; therefore, higher temperatures will result in a lower heat input rate (MMBtu/hr) and vice versa. The temperature is referenced to the CT inlet temperature rather than ambient temperature, as some CTs are equipped with inlet air conditioning systems (e.g., chillers or evaporative coolers) to maintain optimum operating temperature. Inlet air temperature and ambient temperature are equivalent in cases where no conditioning systems are used. Variations of heat input (capacity) are to be expected due to the range of ambient temperatures and humidities encountered in Florida. Over the usual operating ranges, the CT operating curve (capacity vs. inlet air temperature) is essentially a straight line.

The determination of the rate of CT operation during compliance testing is illustrated in the following example. The heat input limit is often referenced to 59°F, and in this example, corresponds to 750 MMBtu/hr (Point A). On the date that compliance testing is conducted, the average ambient (or conditioned) air temperature during the test period is determined to be 80°F. According to the attached curve, the maximum design heat input rate achievable is 700 MMBtu/hr (Point B). The CT has successfully achieved 90 percent of its maximum permitted capacity for this temperature if it is determined to be operating at 630 MMBtu/hr or more (Point C). In this example, the dashed line represents 90 percent of the maximum heat input value achievable over a range of inlet air temperatures. Heat input may vary depending on CT characteristics; therefore, manufacturer's curves for correction to other temperatures shall be provided to the Department, if a source intends to use the curves for compliance purposes. At the request of a permittee, the following conditions may be incorporated into the construction and corresponding operating permits:

1. An owner or operator may use manufacturer's curves or tables in determining the maximum heat input or fuel usage rate for compliance testing. These curves or tables relate compressor inlet conditions to heat input or fuel usage rate and are part of the permit. The data shall have a resolution of 1% of the maximum heat input or fuel usage rate. Inlet condition monitoring shall

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Guidance on Rate of Operation

Page 2

include compressor inlet temperature with optional monitoring of inlet pressure and/or moisture levels when these parameters are also used to correct heat input or fuel usage rate.

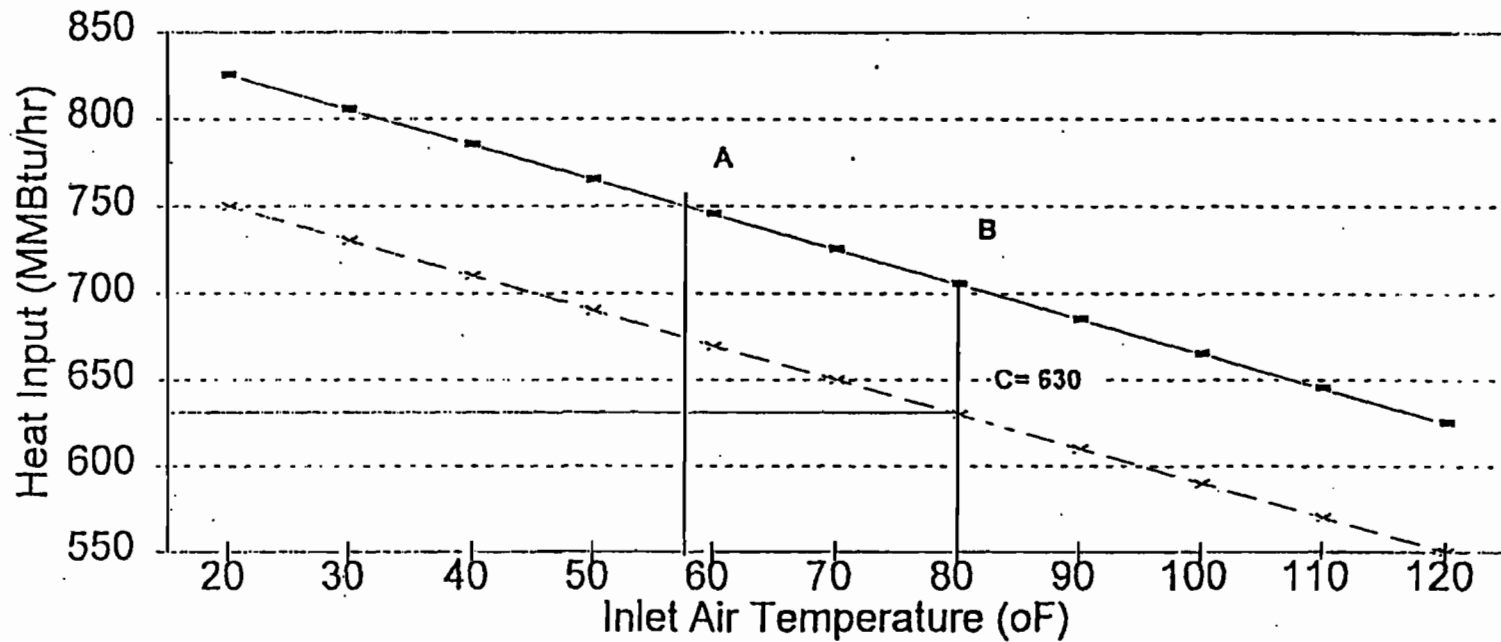
2. Compliance testing of emissions shall be conducted with the combustion turbine operating at capacity. Capacity is defined as 90-100 percent of the manufacturer's rated heat input achievable for the average compressor inlet conditions during the test. If it is impracticable to test at capacity, then combustion turbines may be tested at less than capacity. In such cases, the entire curve or table shall be adjusted downwards by the increment which reflects the reduced rate of operation at which compliance was demonstrated. This increment is equal to the difference between the manufacturer's heat input or fuel usage value and 110 percent of the value reached during the test. In this case, the data and calculations necessary to demonstrate the heat input or fuel usage rate correction shall be submitted to the Department with the compliance test report.

3. To demonstrate compliance with 40 CFR 60.330 federal New Source Performance Standard (NSPS) Subpart GG - Standards of Performance for Stationary Gas Turbines, an initial test shall be conducted at four load points and corrected to International Standards Organization (ISO) conditions for comparison to the NSPS allowable. Subsequent annual compliance tests conducted to establish compliance with NO_x limits that are more stringent than the NSPS standard shall not require an ISO correction or testing at four load points; rather, the testing shall be conducted at capacity, as defined above. However, when the Department has reason to believe that NO_x emissions exceed an applicable NO_x standard (based on emissions data from CEMS or stack testing, or based on fuel quality) the Department may require that the company conduct emissions testing at four loads as required in Subpart GG.



Howard L. Rhodes, Director
Division of Air Resources Management

**COMBUSTION TURBINE OPERATING CURVE
FUEL HEAT INPUT vs. INLET AIR TEMPERATURE**



--- 90% of Maximum Operating Level --- Maximum Operating Capacity

JACKSONVILLE ELECTRIC AUTHORITY
OPERATION AND MAINTENANCE PLAN

RECEIVED

JUN 19 1997

FEDERAL BUREAU OF
AIR REGULATION

In compliance with Section 17-2.650(2)(g)4. of the Administrative Code, the Jacksonville Electric Authority submits its "Operation and Maintenance Plan", to be appended where appropriate to unit operating permits.

Operation and Maintenance

Following is a list of activities to be accomplished for the control of particulate emissions from units in or impacting the Duval County non-attainment area. These schedules apply to each on-line unit.

Daily:

1. Clean one deck of burners (renew tips as necessary).
2. Conduct one complete soot-blowing cycle (or as needed).
3. Maintain optimum fuel oil temperature and pressure.

Weekly:

1. Clean fuel oil strainers (more frequently if required).

Annually:

1. Clean the boiler and inspect baffles.
2. Inspect the:
 - (a) wind-box;
 - (b) registers;
 - (c) diffusers;
 - (d) refractory throat.
3. Adjust the air registers for optimum flame pattern (more frequently if required).
4. Replace burner tips (more frequently if required).

Major Outages:

1. Overhaul the: (a) turbine/generator
(b) boiler and auxiliary equipment.
2. Calibrate the: (a) flow meters including sensing
line checks;
(b) pneumatic controls;
(c) temperature gauges.

Performance Parameters

The following operational parameters are to be recorded on a bi-hourly basis.

1. Steam flow.
2. Number of burners in service.
3. Burner oil pressure.
4. Burner oil temperature.

Fuel Type: Number 6 residual oil unless otherwise stated.

Records

Records of all operating data and maintenance procedures listed herein shall be retained at the Generating Station for review, upon request, for a period of two years.

Plant Name (from Step 1)

STEP 4
Use the standard
requirements and
certification, enter
a name of the
designated repre-
sentative, and sign
and date

Standard RequirementsPermit Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72, Rules 62-214.320 and 330, F.A.C. in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain permit.
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the permitting authority; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.8(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.8(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(i) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

Plant Name (from Step 1)

Recordkeeping and Reporting Requirements (cont.)

- (iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.

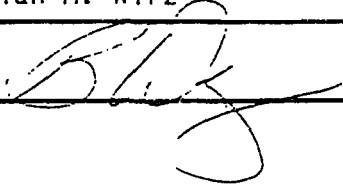
- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
- (6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 75, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities. No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudance review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of title Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Brian M. Wirz	
Signature 	Date 12/14/95

STEP 5 (optional)
Enter the source AIRS
and FINDS identification
numbers, if known

AIRS	BEST AVAILABLE COPY
FINDS	

United States
Environmental Protection Agency
Acid Rain Program

OMR No. 2080-0221
Expires 6-30-88



Certificate of Representation

For more information, see instructions and refer to 40 CFR 72.24

This submission is: New Revised

STEP 1
Identify the source by plant name, State, and ORIS code from NAQS

Plant Name	* JEA, Kennedy Generating Station	State	FL	ORIS Code	666
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STEP 2
Enter requested information for the designated representative

Name	Brian M. Wirz, Associate Managing Director				
Address	Jacksonville Electric Authority 21 West Church Street Jacksonville, FL 32202				
Phone Number	(904) 632-7270	Fax Number	(904) 632-7366		

STEP 3
Enter requested information for the alternate designated representative (optional)

Name					
Address					
Phone Number			Fax Number		

STEP 4
Complete Step 5, read the certifications and sign and date

I certify that I was selected as the designated representative or alternate designated representative, as applicable, by an agreement binding on the owners and operators of the affected source and each affected unit at the source.

I certify that I have given notice of the agreement, selecting me as the designated representative or alternate designated representative, as applicable for the affected source and each affected unit at the source identified in this certificate of representation, daily for a period of one week in a newspaper of general circulation in the area where the source is located or in a State publication designed to give general public notice.

I certify that I have all necessary authority to carry out my duties and responsibilities under the Acid Rain Program on behalf of the owners and operators of the affected source and of each affected unit at the source and that each such owner and operator shall be fully bound by my actions, inactions, or submissions.

I certify that I shall abide by any fiduciary responsibilities imposed by the agreement by which I was selected as designated representative or alternate designated representative, as applicable.

I certify that the owners and operators of the affected source and of each affected unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, an affected unit, or where a utility or industrial customer purchases power from an affected unit under life-of-the-unit, firm power contracts arrangements, I certify that:

I have given a written notice of my selection as the designated representative or alternate designated representative, as applicable, and of the agreement by which I was selected to each owner and operator of the affected source and of each affected unit at the source; and

Allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement or, if such multiple holders have expressly provided for a different distribution of allowances by contract, that allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in accordance with the contract.

The agreement by which I was selected as the alternate designated representative includes a procedure for the owners and operators of the source and affected units at the source to authorize the alternate designated representative to act in lieu of the designated representative.

JEA, Kennedy Generating Station
Plant Name (from Step 1)

Certification

I am authorized to make the submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Signature (designated representative)	<i>[Signature]</i>	Date	8/17/99
Signature (alternate)		Date	

STEP 5
Provide the name of every owner and operator of the source and each affected unit of the source. Identify the units they own and/or operate by their IDs from MADE. For owners only, identify each state or local utility regulatory authority with jurisdiction over each owner.

Jacksonville, Electric Authority						<input checked="" type="checkbox"/> Owner	<input type="checkbox"/> Operator
IDS 8	IDS 9	IDS 10	IDS	IDS	IDS	IDS	
IDS	IDS	IDS	IDS	IDS	IDS	IDS	
Filed Dept/ of Env. Reg.; Reg. & Env. Services Dept. (city) Regulatory Authorities							

Name						<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
IDS	IDS	IDS	IDS	IDS	IDS	IDS	
IDS	IDS	IDS	IDS	IDS	IDS	IDS	
Regulatory Authorities							

Name						<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
IDS	IDS	IDS	IDS	IDS	IDS	IDS	
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Regulatory Authorities							

Name						<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
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Regulatory Authorities							