

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

PROPOSED Permit Electronic Posting Courtesy Notification

JEA
Kennedy Generating Station
Facility ID No.: 0310047
Duval County

Title V Air Operation Permit Renewal
PROPOSED Permit No.: 0310047-012-AV

The electronic version of the PROPOSED permit was posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review on October 28, 2002.

USEPA's review period ends on the 45th day after the permit posting date. Day 45 is December 11, 2002. If an objection (veto) is received from USEPA, the permitting authority will provide a copy of the objection to the applicant.

Provided an objection is not received from USEPA, the PROPOSED permit will become a FINAL permit by operation of law on the 55th day after the permit posting date. Day 55 is December 21, 2002.

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Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
October 28, 2002

David B. Struhs
Secretary

CERTIFIED MAIL – Return Receipt Requested

Mr. James M. Chansler, P.E., D.P.A.
V.P., Operations & Maintenance and Responsible Official
JEA
21 West Church Street
Jacksonville, Florida 32202

Re: PROPOSED Title V Permit Renewal No.: 0310047-012-AV
JEA Kennedy Generating Station

Dear Mr. Chansler:

One copy of the "PROPOSED TITLE V PERMIT RENEWAL DETERMINATION" for the JEA Kennedy Generating Station located at 4215 Talleyrand Avenue, Jacksonville, Duval County, is enclosed. This letter is only a courtesy to inform you that the DRAFT Title V Permit Renewal has become a PROPOSED Title V Permit Renewal.

An electronic version of this determination has been provided to the United States Environmental Protection Agency (USEPA) Region 4 office for their review.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED Title V Permit Renewal is made by the USEPA within 45 days, the PROPOSED Title V Permit Renewal will become a FINAL Title V Permit Renewal no later than 55 days after the date on which the PROPOSED Title V Permit Renewal was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED Title V Permit Renewal, the FINAL Title V Permit Renewal will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Bruce Mitchell at 850/413-9198.

Sincerely,

for A. A. Linero, P.E.
Bureau of Air Regulation

AAL/rbm

Enclosures

Copy furnished to:
Mr. Bert Gianazza, P.E., JEA Tower 9
Mr. Richard Robinson, AWQD
U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

*Posted on 10/28/02
Mailed on 10/29/02*

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STATEMENT OF BASIS

JEA
Kennedy Generating Station
Facility ID No.: 0310047
Duval County

Title V Air Operation Permit Renewal
PROPOSED Permit No.: 0310047-012-AV

This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of four combustion turbines, Nos. 3, 4, 5 and 7. The combustion turbines fire virgin No. 2 fuel oil; in addition, CT No. 7 also fires Natural Gas. There is a fuel oil storage tank farm associated with the turbines. Also, included in this permit are miscellaneous unregulated/ insignificant emissions units and/or activities.

Emissions units numbers 003, 004 and 005 are combustion turbines manufactured by Westinghouse (Model W501G) and are designated as Combustion Turbine No. 3, No. 4 and No. 5, respectively. Each turbine has a maximum heat input from virgin No. 2 fuel oil of 744.0 MMBtu @ 70° F, LHV (Lower Heating Value). The No. 2 fuel oil has a maximum sulfur content of 0.5%, by weight. These combustion turbines are used as peaking units during peak demand times, during emergencies, and during controls testing, to run a nominal 56.2 MW generator (each). Emissions from the combustion turbines are uncontrolled. These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. These emissions units are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. A group of exhaust stacks serve the combustion turbines. Combustion turbines Nos. 3, 4 and 5 began commercial operation in 1973.

Emissions unit number -015 is a natural gas/fuel-fired simple cycle unit that consists of a nominal 170 MW (at 59° F) combustion turbine generator equipped with Dry Low NO_x (DLN-2.6) combustors. The emissions unit was manufactured by General Electric (Model PG 7241 FA) and is designated as Combustion Turbine (CT) No. 7. The CT has (1) a maximum heat input from natural gas of 1,623 MMBtu @ 59° F and 60% relative humidity, LHV (Lower Heating Value), and (2) a maximum heat input from new No. 2 fuel oil of 1,822 MMBtu @ 59° F and 60% relative humidity, LHV (Lower Heating Value). The new No. 2 fuel oil has a maximum sulfur content of 0.05%, by weight. The existing CTs Nos. 3 thru 6 are allowed to fire new No. 2 fuel oil with a maximum sulfur content of 0.5 %, by weight, but will be firing the 0.05 %, by weight, new No. 2 fuel oil since there is only one storage tank. This CT shall be used as a

Statement of Basis (cont.)

JEA

Kennedy Generating Station

PROPOSED Permit No.: 0310047-012-AV

Page 2 of 2

peaking unit during peak demand times and during emergencies. The emissions unit has a 90-foot stack. Emissions from the combustion turbine are uncontrolled. This emissions unit is regulated under 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, adopted by reference in Rule 62-204.800(7)(b), F.A.C.; and, 40 CFR 60, Subpart A, adopted by reference in Rule 62-204.800(7)(d), F.A.C. CT #7 began commercial operation on April 30, 2000.

Since the emissions from the combustion turbines are uncontrolled, Compliance Assurance Monitoring (CAM) does not apply.

Based on the Title V permit renewal application received July 2, 2002, this facility is not a major source of hazardous air pollutants (HAPs).

Comments on the Draft Kennedy Title V Permit

Statement of Basis:

- Paragraph 2, Page 1: The permit states that the combustion turbines fire only virgin No.2 fuel oil. It should be noted that CT7 fires natural gas in addition to fuel oil.

Permit Document:

- Page 7, Subsection A. The permit added the following language – “ Direct water spray fogger devices were installed in the inlet ducts of each CT to provide adiabatic inlet cooling that increases turbine output and decreases heat rate”. *JEA to confirm change as accurate.*
- Page 8, Condition A4 – Hours of Operation: The permit limits operation of each CT with foggers at 399 hours per year. *JEA to confirm.*
- Page 11, Condition A20 – Foggers: A log book shall be maintained..... *JEA to make sure language is acceptable.*
- Page 12, Condition B1 – The permit states that manufacturer’s curves should be provided ...of completing any compliance testing. The previous permit states that only for initial testing. Permit language should be modified to incorporate that change.
- Page 16, Condition B.24 – Testing Procedures: The permit states that the permitted capacity is defined as “95-100 percent of maximum heat input” – where as the previous permit indicates a 90-100 percent range. In addition, the increment for operation is indicated as 105 percent of the maximum tested rate as opposed to 110 percent per the existing Title V permit. The language should be revised to be consistent with the existing permit.
- Page 17, Condition B 25 – The permit requires the permittee to notify the AWQD office prior to any compliance testing, but fails to mention DEP. Is that correct or has a new policy been established that does not require notification to the DEP??
- Page 19, Condition B 30 – Fuel Oil Monitoring Section – Please change “Kennedy Center Station” to “Kennedy Generating Station”.
- Page 20, Condition B 35 – The permit requires the permittee to notify the AWQD office of any malfunctions, but fails to mention DEP. Is that correct or has a new policy been established that does not require notification to the DEP??
- Page 21, Condition B 40 – The permit requires the permittee to send reports to the AWQD office, but fails to mention DEP. Is that correct or has a new policy been established that does not require notification to the DEP?
- Page 23, Title IV permit – Emission Units 8, 9 and 10 are no longer present at the station. They should be removed from the permit.
- Page 24, Condition A.5 – Mr. James Chansler is the new Designated Representative for Title IV purposes. Please make the appropriate changes.
- Appendix I-1, B – Emission Units 8,9 and 10 are no longer present and therefore, the information can be removed from the permit.

PROPOSED TITLE V PERMIT RENEWAL DETERMINATION

JEA's Kennedy Generating Station PROPOSED Title V Permit Renewal No.: 0310047-012-AV

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" to JEA for the Kennedy Generating Station located at 4215 Talleyrand Avenue, Jacksonville, Duval County, was clerked on September 11, 2002. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was published in the Florida Times-Union on September 25, 2002. The DRAFT Permit was available for public inspection at the City of Jacksonville Air & Water Quality Division in Jacksonville and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was received on October 3, 2002.

II. Public Comment(s).

Comments were received and the DRAFT Title V Operation Permit Renewal was changed. The comments were not considered significant enough to reissue the DRAFT Title V Operation Permit Renewal and require another Public Notice, since the permit reflects the federally enforceable applicable conditions from SIP air construction permitting actions. Comments were received from one respondent (JEA) during the 30 (thirty) day public comment period via e-mail on October 10, 2002, and by phone call on October 24, 2002. Referenced below is the comment document received and the responses to the comments. The comment(s) will not be restated. Where duplicative comments exist, the original response is referenced.

A. E-mail from Mr. N. Bert Gianazza, P.E., received October 10, 2002.

1. Statement of Basis and in the Permit. Section I. Subsection A. Facility Description. The comment was to reflect that the No. 7 CT also fires Natural Gas.

Response: The comment is noted and the description will be changed to recognize that CT No. 7 also fires Natural Gas.

2. Permit.

a. Section III. Subsection A. Page 7, General Description. The question regarded the validity of the direct water spray inlet foggers on the existing three (3) CTs, Nos. 3 thru 5.

Response. The incorporation of the direct water spray inlet foggers on the existing three (3) CTs, Nos. 3 thru 5, was done in the revision, Project No. 0310047-011-AV, which was effective on April 24, 2002. Therefore, no change will be made.

b. Section III. Subsection A. Specific Condition A.4.b. The question related to the maximum operational limit of 399 hours/year/EU while using the direct water spray foggers.

Response. The hours of limitation, while using direct water spray foggers, were established in a SIP air construction permit, Project No. 0310047-009-AC, and were incorporated into the Title V Air Operation Permit under a revision, Project No. 0310047-011-AV, which was effective April 24, 2002. Therefore, no change will be made.

c. Section III. Subsection A. Specific Condition A.20. The question related to the requirement to maintain a log book for the operation of the direct water spray foggers.

Response. The requirement to maintain a log book for recording the hours of operation using the direct water spray foggers was established in the revision, Project No. 0310047-011-AV, which was effective April 24, 2002. The rule authority was Rule 62-4.070(3), F.A.C., for reasonable assurances. Therefore, no change will be made.

d. Section III. Subsection B. Specific Condition B.1. Last sentence of the condition. The issue is whether the corrected manufacturer's curve is required to be established after each compliance test, or is it only required at the initial compliance test only?

Response. The language will be changed to reflect what was established in the SIP AC, Project No. 0310047-002-AC. Therefore, in the last sentence of the condition, "any" will be changed to "the initial".

e. Section III. Subsection B. Specific Condition B.24. Request the language established in the air construction permit, Project No. 0310047-007-AC, and the Title V revision, Project No. 0310047-008-AV.

Response. The Department agrees with the request and the following is changed:

FROM:

Testing Procedures. Testing of emissions shall be conducted with the CT 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 Rule 62-204.800, F.A.C.

{Permitting Note: Attached (GE Heat Input Curves) are the manufacturer's heat input curves that are nominal values to be used to aid in defining "full load" for stack testing purposes and do not constitute a limit on heat input.}

[0310047-002-AC]

TO:

Testing Procedures. Compliance testing of emissions shall be conducted with the CT operating at permitted capacity. Permitted 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 permitted capacity, then combustion turbines may be tested at less than permitted 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. Test procedures shall meet all applicable requirements (i.e., testing time frequency, minimum compliance duration, etc.) of Rule 62-204.800, F.A.C.

{Permitting note: Attached (GE Heat Input Curves) are the manufacturer's heat input curves that are nominal values to be used to aid in defining "full load" for stack testing purposes and do not constitute a limit on heat input.}

[0310047-007-AC; and, 0310047-008-AV]

f. Section III. Subsection B. Specific Condition B.25. The issue is whether or not the AWQD office should be notified for anything relating to compliance issues, instead of the Department.

Response. The "AWQD office" is the compliance and enforcement authority. Therefore, no change will be made.

g. Section III. Subsection B. Specific Condition B.30. The request is to change "Kennedy Center Station" to "Kennedy Generating Station".

Response. The Department agrees with the request and the change will be made.

h. Section III. Subsection B. Specific Conditions B.35. and B.40.

Response. See “**Response**” 2.f., above.

i. Section IV. Subsection A. Acid Rain Part.

(1) General Description and Specific Condition A.2.. Request is to delete all references to EUs 8, 9 and 10, since they no longer exist.

Response. The Department agrees with the request and the references will be deleted.

(2) Specific Condition A.5. Request is to specify Mr. James Chansler as the Designated Representative.

Response. Mr. James M. Chansler is specified in this condition as the new Designated Representative.

However, the reference will be deleted because we have the documents on file as to who the Designated Representative is or Designated Representative and Alternate Designated Representatives are for the facility.

3. Appendix I-1, List of Insignificant Emissions Units/Activities.

a. Part B. Request is to delete all references to EUs 8, 9 and 10, since they no longer exist.

Response. The Department agrees with the request and the references will be deleted.

B. Phone call from Mr. David Norse on October 24, 2002.

1. Appendix U. The request was to remove Storage Tanks Nos. 2 and 3, since they are no longer in use. The request is acceptable and they will be removed from Appendix U.

III. Conclusion.

The permitting authority will issue the PROPOSED Title V Operation Permit Renewal, No. 0310047-012-AV, with any changes noted above, and with one minor change due to a permit format modification, as noted below:

1. The Department has recently revised the format for Title V permits that has eliminated **Subsection D. Miscellaneous of Section I. Facility Information.**

This Subsection in the DRAFT permit contained the following statement:

The use of “Permitting Notes” throughout this permit are for informational purposes only and are not permit conditions.

JEA
Kennedy Generating Station
Facility ID No.: 0310047
Duval County

Title V Air Operation Permit Renewal
PROPOSED Permit No.: 0310047-012-AV

Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114
Fax: 850/922-6979

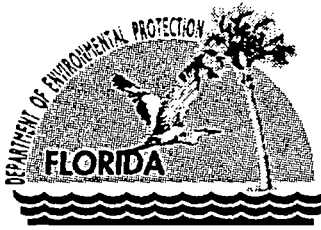
Compliance Authority:

City of Jacksonville
Regulatory and Environmental Services Department
Air and Water Quality Division
117 West Duval Street, Suite 225
Jacksonville, Florida 32202
Telephone: 904/630-4900
Fax: 904/630-3638

Title V Air Operation Permit Renewal
PROPOSED Permit No.: 0310047-012-AV

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Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

Permittee:

JEA
21 West Church Street
Jacksonville, Florida 32202

DRAFT Permit No.: 0310047-012-AV

Facility ID No.: 0310047

SIC No.: 49; 4911

Project: Title V Air Operation Permit Renewal

This permit renewal is for the authorization to operate the JEA's Kennedy Generating Station. This facility is located at 4215 Talleyrand Avenue, Jacksonville, Duval County; UTM Coordinates: Zone 17, 440.065 km East and 3359.150 km North; Latitude: 30° 21' 52" North; and, Longitude: 81° 37' 25" West.

This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix U-1, List of Unregulated Emissions Units and/or Activities
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-4, TITLE V CONDITIONS (version dated 02/12/02)
APPENDIX SS-1, STACK SAMPLING FACILITIES (dated 10/07/96)
TABLE 297.310-1, CALIBRATION SCHEDULE (dated 10/07/96)
Operation and Maintenance Plan
Phase II Acid Rain Applications/Compliance Plans received 12/26/95, 6/2/99 and 8/26/02
Alternate Sampling Procedure: ASP Number 97-B-01
Appendix JEPB Rule 2
GE Heat Input Curves
Appendix 40 CFR 60 Subpart A-General Provisions

Effective Date: January 1, 2003

Renewal Application Due Date: July 5, 2007

Expiration Date: December 31, 2007

Howard L. Rhodes, Director
Division of Air Resource Management

HLR/sms/bm

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Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of four combustion turbines, Nos. 3, 4, 5 and 7. The combustion turbines fire virgin No. 2 fuel oil; in addition, CT No. 7 also fires Natural Gas. There is a fuel oil storage tank farm associated with the turbines. Also, included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the Title V permit renewal application received July 2, 2002, this facility is not a major source of hazardous air pollutants (HAPs).

The facility's emissions units are not subject to Compliance Assurance Monitoring (CAM) requirements.

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

<u>ARMS E.U. ID No.</u>	<u>Brief Description</u>
-003	Combustion Turbine No. 3
-004	Combustion Turbine No. 4
-005	Combustion Turbine No. 5
-015	Combustion Turbine No. 7

Unregulated Emissions Units and/or Activities:

<u>ARMS E.U. ID No.</u>	<u>Brief Description</u>
-010	Storage Tanks (tanks 1 and 4)
-014	Storage Tank (tank 13)

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s) on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H; Permit History
Statement of Basis

These documents are on file with the permitting authority:

BACT Determination dated October 15, 1984.
Initial Title V Permit (FINAL) clerked on December 31, 1997, and effective January 1, 1998.
Title V Permit Renewal application received July 2, 2002.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-4, TITLE V CONDITIONS, is a part of this permit.
{Permitting Note: APPENDIX TV-4, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; and, Jacksonville Environmental Protection Board (JEPB) Rule 2, Part IX]
3. **Not federally enforceable.** Odor Nuisance. Pursuant to Jacksonville Ordinance Code (JOC) Chapter 376, any facility that causes or contributes to the emission of objectionable odors, which results in the City of Jacksonville Air and Water Quality Division (AWQD) receiving and validating complaints from five (5) or more different households within a 90 day period, can be cited for objectionable odors.
[JOC Chapter 376]
4. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
5. Prevention of Accidental Releases (Section 112(r) of CAA).
 - a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any RMPs, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 3346
Merrifield, VA 22116-3346
Telephone: 703/816-4434
 - and,
 - b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]
6. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]

7. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.

[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

8. General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department or its designee.

{Permitting Note: Nothing has been deemed necessary at the time of issuance of this permit.}

[Rule 62-296.320(1)(a), F.A.C.]

9. An Operation and Maintenance Plan is attached and a part of this permit pursuant to Rule 62-296.700(6), F.A.C. All activities shall be performed as scheduled and recorded data made available to the AWQD upon request.

[Rule 62-296.700(6), F.A.C.; and, AO16-180744 and AO16-214191]

10. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

11. The permittee shall submit all compliance related notifications and reports required of this permit to the AWQD and Department's Northeast District offices at the following addresses:

City of Jacksonville	Department of Environmental Protection
Regulatory and Environmental Services Department	Northeast District
Air and Water Quality Division	Air Resources
117 West Duval Street, Suite 225	7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32202	Jacksonville, Florida 32256-7590
Telephone: 904/630-4900	Telephone: 904/807-3300
Fax: 904/630-3638	Fax: 904/448-4363

12. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air & EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155
Fax: 404/562-9163

13. **Not federally enforceable.** Appendix JEPB Rule 2 is incorporated by reference. The facility shall be subject to JEPB Rule 2, Parts I through VII, and Parts IX through XIII. (Permitting note: This appendix provides the applicable rules of the City of Jacksonville Environmental Protection Board (JEPB) contained in Rule 2, Air Pollution Control, and the corresponding rules of the Department that have been adopted by reference and within the SOA (Specific Operating Agreement) signed with the Department.)

14. **Not federally enforceable.** The facility shall be subject to the City of Jacksonville Ordinance Code, Title X, Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 376 [Odor Control], and JEPB Rule 85-1 [Final Rules with Respect to Organization, Procedures, and Practice].

15. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department, or its designee, and the EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-4, TITLE V CONDITIONS.)”

16. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

Section III. Emissions Units.

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions units.

<u>E.U. ID No.</u>	<u>Brief Description</u>
-003	Combustion Turbine No. 3
-004	Combustion Turbine No. 4
-005	Combustion Turbine No. 5

Emissions units numbers 003, 004 and 005 are combustion turbines manufactured by Westinghouse (Model W501G) and are designated as Combustion Turbine No. 3, No. 4 and No. 5, respectively. Each turbine has a maximum heat input from virgin No. 2 fuel oil of 744.0 MMBtu @ 70° F, LHV (Lower Heating Value). The No. 2 fuel oil has a maximum sulfur content of 0.5%, by weight. These combustion turbines are used as peaking units during peak demand times, during emergencies, and during controls testing, to run a nominal 56.2 MW generator (each). Emissions from the combustion turbines are uncontrolled. Direct water spray fogger devices were installed in the inlet ducts of each CT to provide adiabatic inlet air cooling that increases turbine output and decreases heat rate. A group of exhaust stacks serve the CTs.

{Permitting Notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. These emissions units are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. Combustion turbines Nos. 3, 4 and 5 began commercial operation in 1973.}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rates are as follows:

<u>EU ID. No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
3	744.0 @ 70° F, LHV	No. 2 Fuel Oil
4	744.0 @ 70° F, LHV	No. 2 Fuel Oil
5	744.0 @ 70° F, LHV	No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; AO16-173880; and, derived from data in tabular format and provided by the permittee on 10/22/97]

A.2. Emissions Unit Operating Rate Limitation After Testing. See Specific Condition **A.13**. [Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation - Fuels. Only virgin distillate No. 2 fuel oil shall be fired in the combustion turbines. [Rule 62-213.410(1), F.A.C.; and, AO16-173880]

A.4. Hours of Operation.

a. These CTs may operate continuously, i.e., 8,760 hours/year.

b. Each CT shall not exceed 399 hrs/yr operation while using foggers.

[Rule 62-210.200(PTE), F.A.C.; AO16-173880; 0310047-009-AC; and, 0310047-011-AV]

Emission Limitations and Standards

A.5. Visible Emissions. Visible emissions from each turbine shall not be equal to or greater than 20 percent opacity.

{Permitting Note: The averaging time for this condition is based on the run time of the specified test method.}

[Rule 62-296.320(4)(b)1., F.A.C.; and, AO16-173880]

A.6. Sulfur Dioxide - Sulfur Content. The sulfur content of the No. 2 fuel oil shall not exceed 0.5 percent, by weight.

[Requested in initial Title V permit application dated June 14, 1996; and, AO16-173880]

Excess Emissions

A.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and 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(1), F.A.C.]

A.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

A.9. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See Specific Conditions **A.6.** and **A.12.**

[Rule 62-213.440, F.A.C.]

A.10. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight 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.]

Test Methods and Procedures

A.11. The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.

[Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

A.12. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or equivalent.

[Rules 62-213.440 and 62-297.440, F.A.C.]

A.13. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rule 62-297.310(2), F.A.C.]

A.14. Applicable Test Procedures.

(a) Required Sampling Time.

2. Opacity Compliance Tests. When EPA Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

A.15. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

9. The owner or operator shall notify the AWQD office, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department or its designee, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department or its designee.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; AO16-173880; and, SIP approved.]

A.16. Visible Emissions Testing - Biennial. By this permit, biennial (odd years) emissions compliance testing for visible emissions is required for each emissions unit, but is not required for those emissions units burning No. 2 fuel oil for less than 400 hours during the previous even year or the current odd year in question.

[Rules 62-297.310(7)(a)4. & 8., F.A.C.; and, AO16-173880]

Recordkeeping and Reporting Requirements

A.17. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the AWQD office in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department and/or the AWQD office(s).

[Rule 62-210.700(6), F.A.C.]

A.18. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the AWQD office on the results of each such test.

(b) The required test report shall be filed with the AWQD office as soon as practical but no later than 45 days after the last sampling run of each test is completed.

[Rule 62-297.310(8), F.A.C.]

A.19. Records of No. 2 fuel oil consumption shall be maintained and made available to the Department and/or the AWQD upon request.

[Rule 62-213.440, F.A.C.; and, AO16-173880]

A.20. Foggers. A log book shall be maintained to show when each CT is using a fogger device and shall provide the beginning and ending times (hour and minute) of its use. See Specific Condition **A.4.b.**

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

Section III. Emissions Unit(s) and Conditions.

Subsection B. This section addresses the following emissions unit.

<u>E.U. ID No.</u>	<u>Brief Description</u>
-015	Combustion Turbine No. 7 (CT #7)

Emissions unit number -015 is a natural gas/fuel-fired simple cycle unit that consists of a nominal 170 MW (at 59° F) combustion turbine generator equipped with Dry Low NO_x (DLN-2.6) combustors. The emissions unit was manufactured by General Electric (Model PG 7241 FA) and is designated as Combustion Turbine (CT) No. 7. The CT has (1) a maximum heat input from natural gas of 1,623 MMBtu @ 59° F and 60% relative humidity, LHV (Lower Heating Value), and (2) a maximum heat input from new No. 2 fuel oil of 1,822 MMBtu @ 59° F and 60% relative humidity, LHV (Lower Heating Value). The new No. 2 fuel oil has a maximum sulfur content of 0.05%, by weight. The existing CTs Nos. 3 thru 6 are allowed to fire new No. 2 fuel oil with a maximum sulfur content of 0.5 %, by weight, but will be firing the 0.05 %, by weight, new No. 2 fuel oil since there is only one storage tank. This CT shall be used as a peaking unit during peak demand times and during emergencies. This CT replaced one existing natural gas/fuel oil-fired boiler identified by JEA as KE10 (ARMS Emission Unit -009: Boiler #10). The emissions unit has a 90-foot new stack.

{Permitting Notes: This emissions unit is regulated under 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, adopted by reference in Rule 62-204.800(7)(b), F.A.C.; and, 40 CFR 60, Subpart A, adopted by reference in Rule 62-204.800(7)(d), F.A.C. CT #7 began commercial operation on April 30, 2000.}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rates, 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 are as follows:

<u>E.U. ID No.</u>	<u>MMBtu/hr Heat Input</u>	<u>Fuel Type</u>
7	1,623.0 @ 59° F, LHV	Natural Gas
	1,822.0 @ 59° F, LHV	No. 2 Fuel Oil

The maximum heat input rate will vary depending upon the turbine inlet conditions and the CT's characteristics. Manufacturer's curves corrected for site conditions or equations for correction to other ambient conditions shall be provided to the Department or the AWQD office within 45 days of completing the initial compliance testing.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 0310047-002-AC]

B.2. Emissions Unit Operating Rate Limitation After Testing. See Specific Condition B.24. [Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation - Fuels. Only pipeline natural gas and virgin distillate No. 2 fuel oil, or better, shall be fired in the CT.

[Rule 62-213.410(1), F.A.C.; and, 0310047-002-AC]

B.4. Hours of Operation. The maximum allowable hours of operation in any 12-month period (MAXHROP) for this CT are 4050 hours on pipeline natural gas and 1260 on virgin distillate No. 2 fuel oil or the hours calculated pursuant to the following formula:

$$\text{MAXHROP} = 4050 - (3.215 \times \text{ACTHROPFO})$$

Where: ACTHROPFO = actual hours of operation on fuel oil.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 0310047-002-AC]

Control Technology

B.5. Dry Low NO_x (DLN) combustor shall be installed on this stationary combustion turbine to control nitrogen oxides (NO_x) emissions.

[0310047-002-AC]

B.6. 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_x emissions and CO emissions.

[0310047-002-AC]

B.7. A water injection system shall be installed for use when firing No. 2 or superior grade distillate fuel oil for control of NO_x emissions.

[0310047-002-AC]

Emission Limitations and Standards

B.8. 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 lbs/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.

[0310047-002-AC]

B.9. Sulfur Dioxide - Sulfur Content. The sulfur content of the virgin distillate No. 2 fuel oil shall not exceed 0.05 percent, by weight.

[0310047-002-AC]

B.10. The following are the emission limits for this CT assuming full load. Values for NO_x are at 15% O₂ 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.

NO _x	SO ₂	CO	VOC	PM/Visibility (% Opacity)	Technology and Comments
15 ppm (NG) 42 ppm (FO)	<2gr/100scf (NG) 0.05% (FO)	15 ppm (NG) 20 ppm (FO)	1.4 ppm (NG) 3.5 ppm (FO)	10	Dry Low NO _x Pipeline Natural Gas Good Combustion FO, 0.05%, by wt, Sulfur

[0310047-002-AC]

B.11. Nitrogen Oxides (NO_x) Emissions. The concentration of NO_x concentrations in the exhaust gas of this CT shall not exceed 15 ppm at 15% O₂ (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_x emissions calculated as NO₂ (at ISO conditions) shall exceed neither 15 ppm at 15% O₂ nor 99 lbs/hr to be demonstrated by stack test. Total annual NO_x emissions shall not exceed 200 tons on a 12-month rolling average basis (gas/oil or gas or oil).

[0310047-002-AC; and, Rule 62-212.400(2)(g), F.A.C.]

B.12. NO_x Emissions. The concentration of NO_x concentrations in the exhaust gas of this CT shall not exceed 42 ppm at 15% O₂ (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_x emissions calculated as NO₂ (at ISO conditions) shall exceed neither 42 ppm at 15% O₂ nor 318 lbs/hr to be demonstrated by stack test. Total annual NO_x emissions shall not exceed 200 tons on a 12-month rolling average basis (natural gas/fuel oil or natural gas or fuel oil).

[0310047-002-AC; and, Rule 62-212.400(2)(g), F.A.C.]

B.13. Carbon Monoxide (CO) Emissions. The concentration of CO in the exhaust gas shall not exceed 15 ppmvd (natural gas) and 20 ppmvd (fuel oil) as measured by EPA Method 10. CO emissions (at ISO conditions) shall not exceed 48 lbs/hr (natural gas) and 97 lbs/hr (fuel oil) to be demonstrated by stack test.

[0310047-002-AC]

B.14. Volatile Organic Compounds (VOC) Emissions. The concentration of VOC in the exhaust gas shall not exceed 1.4 ppmvd (natural gas) and 3.5 ppmvd (fuel oil) as determined by EPA Methods 18, 25 or 25 A. VOC emissions (at ISO conditions) shall not exceed 2.9 lbs/hr (natural gas) and 19 lbs/hr (fuel oil).

[0310047-002-AC]

B.15. Sulfur Dioxide (SO₂) Emissions. SO₂ emissions (at ISO conditions) shall not exceed 9.7 lbs/hr when firing pipeline natural gas and 98 lbs/hr when firing maximum 0.05 percent, by weight, sulfur content 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 **B.29.** and **B.30.** will demonstrate compliance with the applicable NSPS SO₂ 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 %, by weight, sulfur content (fuel oil) will demonstrate compliance with the permit limits for SO₂. Emissions of SO₂ shall not exceed 62 tons per year.
[0310047-002-AC; and, Rule 62-212.400(2)(g), F.A.C.]

Excess Emissions

{Permitting Note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of an NSPS, NESHAP, or Acid Rain program provision.}

B.16. Excess emissions from resulting from startup, shutdown or malfunction shall be permitted provided (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(1), F.A.C.; and, 0310047-002-AC]

B.17. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.; and, 0310047-002-AC]

Test Requirements and Compliance Determination

B.18. Annual compliance tests required by 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.
[40 CFR 60.8; and, 0310047-002-AC]

B.19. Annual compliance tests shall be performed during every federal fiscal year (October 1 - September 30) pursuant to Rule 62-297.310(7), F.A.C., unless otherwise 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.

- a. EPA Reference Method 5 or 17, "Determination of Particulate Emissions from Stationary Sources".
- b. EPA Reference Method 9, "Visual Determination of the Opacity of Emissions from Stationary Sources".
- c. EPA Reference Method 10, "Determination of Carbon Monoxide Emissions from Stationary Sources".
- d. 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.
- e. EPA Reference Method 18 or 25 and/or 25A, "Determination of Volatile Organic Concentrations." Initial test only.

[0310047-002-AC]

B.20. Continuous Compliance with the NO_x Emission Limits. Continuous compliance with the NO_x 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 Rule 62-210.700, F.A.C. A valid hourly emission rate shall be calculated for each hour in which at least two NO_x concentrations are obtained at least 15 minutes apart. These excess emissions periods shall be reported as required in Specific Conditions **B.35.** and **B.41.**
[0310047-002-AC; and, 40 CFR 75]

B.21. Compliance with the SO₂ and PM/PM₁₀ Emission Limits. Notwithstanding the requirements of Rule 62-297.310(7), F.A.C., the use of pipeline natural gas and a maximum 0.05 percent sulfur content, by weight, No. 2 or superior grade virgin distillate fuel oil is the method for determining compliance for SO₂ and PM₁₀. For the purposes of demonstrating compliance with the 40 CFR 60.333 SO₂ standard and the 0.05% sulfur content limit, by weight, fuel oil analysis using ASTM D2880-71 or D4294 (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).
[0310047-002-AC]

B.22. Compliance with the CO Emission Limit. Annual compliance testing for CO may be conducted at less than capacity when compliance testing is conducted concurrent with the annual NO_x RATA testing, which is performed pursuant to 40 CFR 75.
[0310047-002-AC; and, 40 CFR 75]

B.23. Compliance with the VOC Emission Limit. After the initial compliance test, the CO emission limit will be employed as a surrogate and no annual testing is required.
[0310047-002-AC]

B.24. Testing Procedures. Compliance testing of emissions shall be conducted with the CT operating at permitted capacity. Permitted 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 permitted capacity, then combustion turbines may be tested at less than permitted 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. Test procedures shall meet all

applicable requirements (i.e., testing time frequency, minimum compliance duration, etc.) of Rule 62-204.800, F.A.C.

{Permitting Note: Attached (GE Heat Input Curves) are the manufacturer's heat input curves that are nominal values to be used to aid in defining "full load" for stack testing purposes and do not constitute a limit on heat input.}

[0310047-007-AC; and, 0310047-008-AV]

B.25. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

9. The owner or operator shall notify the AWQD office, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department or its designee, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department or its designee.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply. [Rule 62-297.310(7), F.A.C.; 0310047-002-AC; and, SIP approved.]

B.26. Stack Testing Facilities. Stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C. See Appendix SS-1, Stack Sampling Facilities. [0310047-002-AC; and, Rule 62-297.310(6), F.A.C.]

Monitoring of Operations

B.27. 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_x emissions (ppmvd at 15% oxygen) are above the standards listed in this permit shall be provided to the Department's Bureau of Air Monitoring and Mobile Sources pursuant to 40 CFR 75. [0310047-002-AC; and, 40 CFR 75]

B.28. CEMS in Lieu of Water to Fuel Ratio. The NO_x 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). 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_x CEMS. Upon request from Department or its designee, the CEMS emission rates for NO_x on this CT shall be corrected to ISO conditions to demonstrate compliance with the NO_x standard established in 40 CFR 60.332. [0310047-002-AC]

B.29. 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):

- a. The permittee shall apply for an Acid Rain permit within the deadlines specified in 40 CFR 72.30.
- b. 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)).
- c. This unit shall be monitored for SO₂ 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, SO₂, emissions must be accounted for as required pursuant to 40 CFR 75.11(d).

[0310047-002-AC; and, 40 CFR 75]

B.30. Fuel Oil Monitoring Schedule. The following monitoring schedule for No. 2 or superior grade virgin distillate fuel oil shall be followed: For all bulk shipments of No. 2 or superior grade virgin distillate fuel oil received at the Kennedy Generating 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). See Specific Condition **B.21**.
[0310047-002-AC]

B.31. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight 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.; and, 0310047-002-AC]

B.32. When NO_x 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.
[0310047-002-AC]

B.33. In lieu of utilizing CEMs, for NO_x, the permittee may elect to utilize the protocol specified under 40 CFR Part 75, Appendix E.
[0310047-002-AC; 40 CFR 72.2; and, 40 CFR 75, Appendix E]

B.34. 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 75. Quality assurance procedures must conform to all applicable sections of 40 CFR 60, Appendix F, or 40 CFR 75. Data on CEM equipment specifications, manufacturer, type, calibration and maintenance needs, and its proposed location shall be provided to the Department for review at least 90 days prior to installation.
[0310047-002-AC; and, 40 CFR 75]

Recordkeeping and Reporting Requirements

B.35. Malfunction Reporting. In the case of excess emissions resulting from malfunctions, the owner or operator shall notify the AWQD office in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department and/or the AWQD office(s).

[Rule 62-210.700(6), F.A.C.; and, 0310047-002-AC]

B.36. CEMS Requirement for Reporting Excess Emissions. This unit shall comply with the CEM frequency data report as specified in 40 CFR 60.7(c).

[40 CFR 60.7; and, 0310047-002-AC]

B.37. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the AWQD office on the results of each such test.

(b) The required test report shall be filed with the AWQD office as soon as practical, but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the AWQD office to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.

13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.; and, 0310047-002-AC]

B.38. Records of No. 2 virgin distillate fuel oil, or better, consumption shall be maintained and made available to the Department and/or the AWQD office(s) upon request.

[Rule 62-213.440, F.A.C.]

B.39. 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 Department and/or AWQD representatives upon request.

[0310047-002-AC]

B.40. Quarterly Reports. Quarterly excess emission reports, in accordance with 40 CFR 60.7 (a)(7)(c) (1997 version), shall be submitted to the AWQD office.

[0310047-002-AC; and, 40 CFR 60.7]

B.41. Excess Emissions Report. If excess emissions occur for more than two hours due to malfunction, the owner or operator shall notify the AWQD office 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 or its designee 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 this permit.

[0310047-002-AC; and, 40 CFR 60.7 (1997 version)]

Miscellaneous

B.42. 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.

[0310047-002-AC]

B.43. The CT shall be in compliance with all applicable requirements of 40 CFR 60, Subpart A, General Provisions (see Appendix 40 CFR 60, Subpart A, General Provisions, which is incorporated by reference), 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

[0310047-002-AC; and, 40 CFR 60, Subpart A]

B.44. ARMS Emission Unit -015, Power Generation, consisting of one (nominal) 170 MW combustion turbine (simple cycle peaking operation), shall comply with all applicable provisions of 40 CFR 60, 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).

[0310047-002-AC]

Section IV. This section is the Acid Rain Part.

Operated by: JEA
ORIS code: 0666

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions units listed below are regulated under Acid Rain Part, Phase II.

<u>E.U. ID No.</u>	<u>Description</u>
-015	Combustion Turbine #7 (start-up April 30, 2000)

A.1. The Phase II permit application(s) submitted for this facility, as approved by the Department, are a part of this permit. The owners and operators of these Phase II acid rain units must comply with the standard requirements and special provisions set forth in the application(s) listed below:

- a. DEP Form No. 62-210.900(1)(a), received 08/26/2002.
 [Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO2) allowance allocations requirements for each Acid Rain unit are as follows:

<u>E.U. ID No.</u>	<u>EPA ID</u>	<u>Year</u>	<u>2003</u>	<u>2004</u>	<u>2005</u>	<u>2006</u>	<u>2007</u>
-015	7	SO2 allowances, under Table 2 of 40 CFR Part 73	0*	0*	0*	0*	0*

*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 of 40 CFR 73.

A.3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

- 1. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.
- 2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
- 3. Allowances shall be accounted for under the Federal Acid Rain Program.
 [Rule 62-213.440(1)(c), F.A.C.]

A.4. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition 51., APPENDIX TV-4, TITLE V CONDITIONS}
 [Rule 62-214.420(11), F.A.C.]

A.5. Comments, notes, and justifications: None.

Appendix H-1: Permit History

JEA
Kennedy Generating Station

PROPOSED Permit No.: 0310047-012-AV
Facility ID No.: 0310047

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Effective Date	Expiration Date	Project Type
All	Facility	0310047-001-AV	01/01/1998	12/31/2001	Initial
All	Facility	0310047-012-AV	01/01/2003	12/31/2007	Renewal

Appendix I-1, List of Insignificant Emissions Units and/or Activities

JEA
Kennedy Generating Station

PROPOSED Permit No.: 0310047-012-AV
Facility ID No.: 0310047

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities:

A. Storage Tanks.

1. JEA Tank #5	Magnesium Oxide	10,000 gallons
2. JEA Tank #6	Lube Oil - Units 9/10	9,400 gallons
3. JEA Tank #7	Lube Oil - Units 8/9	4,800 gallons
4. JEA Tank #8	Black Start Diesel	3,000 gallons
5. JEA Tank #9	Mineral Acid	5,000 gallons
6. JEA Tank #10	Caustic	5,000 gallons
7. JEA Tank #11	Hypochloride	15,228 gallons
8. JEA Tank #12	FeSO ₄	2,500 gallons
9. JEA Tanks #15	Sodium BiSulfite	2,500 gallons

B. Reserved.

C. Emergency Generator.

1. One at this site. The emergency generator has historically fired less than 10,000 gallons per year of diesel fuel. The emergency generator draws its fuel from a single diesel fuel oil storage tank that supports the auxiliary boiler (the fuel oil has a maximum fuel sulfur content limit of 0.5%, by weight).

D. Black-start Generators.

1. Two at this site. These generators have historically fired a total amount of less than 10,000 gallons per year. They draw their fuel from a single diesel storage tank (the fuel oil delivered is the same as that delivered for the emergency generator, i.e., with a maximum sulfur content of 0.5%, by weight).

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

JEA
Kennedy Generating Station

PROPOSED Permit No.: 0310047-012-AV
Facility ID No.: 0310047

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

E.U. ID No. **Brief Description of Emissions Units and/or Activity**

-010 Storage Tanks (tanks 1 and 4)

-014 Storage Tank (tank 13)

-010 Storage Tanks.

1. JEA Tank #1	No. 6 Fuel Oil Storage	4,578,000 gallons
2. JEA Tank #4	No. 6 Fuel Oil Storage	4,578,000 gallons

-014 Storage Tank.

1. JEA Tank #13	No. 2 Fuel Oil Storage	1,512,000 gallons
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Mitchell, Bruce

From: Friday, Barbara
Sent: Monday, October 28, 2002 12:47 PM
To: Gracy Danois; Jeananne Gettle; Joel Huey; Kathleen Forney; Walker, Elizabeth (AIR)
Cc: Mitchell, Bruce
Subject: New Posting #0310047

There is a new posting on Florida's website.

0310047012AV
JEA - Kennedy Generating Station

Proposed Permit Renewal

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

Thanks,
Barbara

Mitchell, Bruce

To: Friday, Barbara
Cc: Sheplak, Scott
Subject: Posting of PROPOSED permit package for EPA: JEA's Kennedy Generating Station:
0310047-012-AV.

10/28/02

Barbara,

Please post the following PROPOSED permit for the above referenced permitting project for EPA's review:

o: Bar/Title V/Bruce/Permits/0310047.012.AV.JEA.Kennedy.Renewal

0310047.012.PD

0310047.012.SOB

0310047G.012

0310047H.012

0310047U.012

0310047p.012.AV.Kennedy.Renewal

Many thanks.

Bruce

Mitchell, Bruce

From: Mitchell, Bruce
Sent: Thursday, October 17, 2002 10:49 AM
To: 'Gianazza, N. Bert'
Subject: RE: Kennedy Comments

0310047.012.PD.doc

10/17/02

Here's the latest version (attached) of the PROPOSED Determination for the Kennedy renewal, which has been changed to reflect acceptance of the 1st comment for the CT No. 7 for the firing of NG. I apologize for misreading the comment. Take care.

Bruce Mitchell
850/413-9198

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

From: Gianazza, N. Bert [mailto:GianNB@jea.com]
Sent: Thursday, October 10, 2002 2:05 PM
To: Mitchell, Bruce
Subject: FW: Kennedy Comments

Fyi.

Talk to you Tuesday.

B.

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

From: Gujjarlapudi, Ebenezer S. [mailto:GujjarlapudiES@bv.com]
Sent: Thursday, October 10, 2002 10:36 AM
To: Gianazza, N. Bert
Subject: Kennedy Comments

Bert:

Please find attached a document with my comments on the Kennedy Generating Station.

<<Comments on the Draft Kennedy Title V Permit.doc>>

If you have any questions or need any additional information, please feel free to contact me.

Regards,
Ebenezer S. Gujjarlapudi, P.E.
Environmental Engineer
Black & Veatch Corporation
10751 Deerwood Park Blvd, Suite 130
Jacksonville, FL 32256
Ph: (904) 997-7106
Fax: (904) 641-7860

Mitchell, Bruce

To: giannb@jea.com
Subject: Draft PROPOSED Permit

10/15/02

Bert,

Per your request, I have attached the draft of the PROPOSED Permit. Take care.

Bruce

0310047p.012.AV.Ken
nedv.Renewa...