

21 West Church Street
Jacksonville, Florida 32202-3139

RECEIVED

NOV 05 2004

November 4, 2004

BUREAU OF AIR REGULATION



Mr. Bruce Mitchell, P.E.
Environmental Administrator
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Brandy Branch Generating Station, Permit No. 0310485-005-AV
Kennedy Generating Station, Permit No. 0310047-011-AV
Requests for Permit Revisions to Remove Liquid Fuel Nitrogen
Testing Requirement

Dear Mr. Mitchell:

Per our conversation, please hold our request for permit revision dated September 22, 2004 and October 7, 2004 for Brandy Branch Generating Station in abeyance until we apply for a Title V revision to incorporate the combined cycle conversion of Units 2 and 3.

Also, enclosed please find the additional permit application pages you requested to process our permit revision request dated September 21, 2004 and October 7, 2004 pertaining to the **Kennedy Generating Station**.

An exception to the Responsible Official Certification is attached in the form of recent JEA correspondences as well.

If you have any questions, please call me at (904) 665-6247.

Sincerely,

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

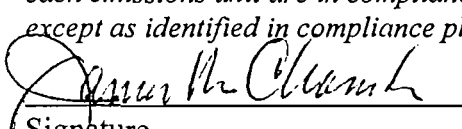
N. Bert Gianazza, P.E.
Environmental Services

Enclosures

APPLICATION INFORMATION

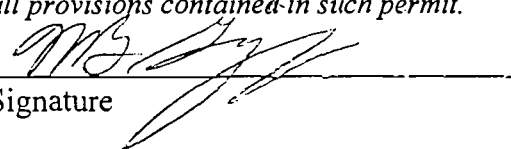
Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Mr. James M. Chansler, P.E., D.P.A., Vice President, Operations and Maintenance
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: JEA Street Address: 21 West Church Street City: Jacksonville State: FL Zip Code: 32202
4. Application Responsible Official Telephone Numbers... Telephone: (904) 665-4433 ext. Fax: (904) 665-7990
5. Application Responsible Official Email Address:
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature _____ Date <u>11/4/04</u>

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: N. Bert Gianazza Registration Number: 38640
2. Professional Engineer Mailing Address... Organization/Firm: JEA Street Address: 21 W Church Street, Tower 8 City: Jacksonville State: FL Zip Code: 32202
3. Professional Engineer Telephone Numbers... Telephone: (904) 665-6247 ext. Fax: (904) 665-7376
4. Professional Engineer Email Address: giannb@jea.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input checked="" type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature  Date <u>10/28/04</u> (seal)

* Attach any exception to certification statement.



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)
– Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: JEA	
2. Site Name: Kennedy Generating Station	
3. Facility Identification Number: 0310047	
4. Facility Location... 4217 ² Talleyrand Ave. Street Address or Other Locator: City: Jacksonville County: Duval Zip Code:	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Bert Gianazza	
2. Application Contact Mailing Address... Organization/Firm: JEA Street Address: 21 W. Church St. City: Jacksonville State: FL Zip Code: 32202	
3. Application Contact Telephone Numbers... Telephone: () - 904-665-6247 ext. Fax: () - 904-665-7376	
4. Application Contact Email Address: giannb@jea.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Project Number(s):	0310047-013-AC / 0310047-014-AV
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

21 West Church Street
Jacksonville, Florida 32202-3139



October 8, 2004

VIA FACSIMILE 202-343-2357

Mr. Manuel Oliva
6204J
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

ELECTRIC

WATER

SEWER

Re: Brandy Branch Generating Station – Combustion Turbines 1, 2, and 3
Title V Air Operation Permit No. 0310485-005-AV
(DEP E.U. I.D. No. 001, 002, and 003; EPA ID No. 001, 002, 003
(ORIS code 7846))

Kennedy Generating Station – Combustion Turbine No. 7
Title V Air Operation Permit No. 0310047-012-AV
(DEP E.U. I.D. No. 015; EPA ID No. 7 (ORIS code 0666))

Northside Generating Station – Boiler No. 3
Title V Air Operation Permit No. 0310045-011-AV
(DEP E.U. I.D. No. 003; EPA ID No. 3 (ORIS code 0667))

Dear Mr. Oliva:

This letter is to notify the U.S. Environmental Protection Agency (EPA) of potential deviations from monitoring-related requirements for the five above-referenced units located at three of JEA's facilities. Specifically, JEA suspects deviations from some of the specific and detailed requirements of 40 CFR Part 75 regarding the calibration, operation, and maintenance of continuous emissions monitors on these five units, as required under the Title V and Acid Rain permits and the federal acid rain program.

After receiving a critical error report from the EPA in response to a recently submitted quarterly emissions data report (EDR) for a Brandy Branch unit, JEA initiated a review and hired RMB Consulting, Inc., to assist in that review to identify and define any potential problems with the continuous emissions monitoring system, and eventually to

Letter to Oliva
October 8, 2004
Page 2 of 2

develop suggested resolutions to any such problems. I believe that Mr. Russell Berry with RMB contacted you regarding this initial effort.

Preliminary results of that review have identified potential deviations with certain requirements under 40 CFR Part 75 for all five of the units referenced above, and suggest that a more in-depth and detailed analysis of the situation is warranted. While this analysis will take some time to complete because of the enormous quantity of data to be reviewed and the number of units involved, we hope to have preliminary findings within the next three to four weeks. Concurrently, we are beginning to take immediate action to upgrade the continuous emissions monitoring programs at these three facilities.

In addition to addressing any specific points of deviation, however, we are also analyzing our entire continuous emissions monitoring program and approach to data quality. We are attempting to upgrade our program as quickly and as aggressively as possible, such as through increased personnel and improved procedures, training, equipment, and software. As a result of the review and analysis being performed by RMB, as an independent third party, and as a result of input from you and your staff, we intend to have an unexceptionable program as soon as is practicably possible.

In the meantime, we will be contacting you to schedule a meeting so we can provide a more detailed briefing regarding the initial findings of the review and our intended strategy at this point. If you have any questions in the meantime, please do not hesitate to call me.

Sincerely,



Susan Hughes
JEA Vice President of Environmental Services
Alternative Responsible Official and
Alternative Designated Representative

21 West Church Street
Jacksonville, Florida 32202-3139



October 8, 2004

VIA FACSIMILE 904-448-4319

ELECTRIC

Mr. Chris Kirts
Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256

WATER

SEWER

VIA FACSIMILE 904-630-3488

Ms. Janice Eggleton Davis, Director
Environmental Resource Management Department
117 West Duval Street, Suite 225
Jacksonville, FL 32202

Re: Brandy Branch Generating Station – Combustion Turbines 1, 2, and 3
Title V Air Operation Permit No. 0310485-005-AV
(DEP E.U. I.D. No. 001, 002, and 003; EPA ID No. 001, 002, 003
(ORIS code 7846))

Kennedy Generating Station – Combustion Turbine No. 7
Title V Air Operation Permit No. 0310047-012-AV
(DEP E.U. I.D. No. 015; EPA ID No. 7 (ORIS code 0666))

Northside Generating Station – Boiler No. 3
Title V Air Operation Permit No. 0310045-011-AV
(DEP E.U. I.D. No. 003; EPA ID No. 3 (ORIS code 0667))

Dear Ms. Davis and Mr. Kirts:

This letter is to notify the City of Jacksonville's Environmental Quality Division and the Florida Department of Environmental Protection of potential deviations from monitoring-related requirements for the five above-referenced units located at three of JEA's facilities. Specifically, JEA suspects deviations from some of the specific and detailed requirements of 40 CFR Part 75 regarding the calibration, operation, and

Letter to Kirts and Davis
October 8, 2004
Page 2 of 2

maintenance of continuous emissions monitors on these five units, as required under the Title V and Acid Rain permits and the federal acid rain program.

After receiving a critical error report from the EPA in response to a recently submitted quarterly emissions data report (EDR) for a Brandy Branch unit, JEA initiated a review and hired RMB Consulting, Inc., to assist in that review to identify and define any potential problems with the continuous emissions monitoring system, and to develop suggested resolutions to any such problems. The preliminary results of that review have identified potential deviations with certain requirements under 40 CFR Part 75 for all five of the units referenced above, and suggest that a more in-depth and detailed analysis of the situation is warranted.

While this analysis will take some time to complete because of the enormous quantity of data to be reviewed and the number of units involved, we hope to have preliminary findings within the next three to four weeks and we are beginning to take immediate action to upgrade the continuous emissions monitoring programs at these three facilities. As you may appreciate, each quarterly report includes approximately 20,000 lines of data per unit, and we are analyzing each quarterly report for the last four years for each of the five units. While part of the analysis is performed electronically, much data must still be reviewed by individuals on a manual basis, and this is, of course, quite time consuming.

In addition to addressing any specific points of deviation, however, we are also analyzing our entire continuous emissions monitoring program and approach to data quality. We are attempting to upgrade our program as quickly and as aggressively as possible, such as through increased personnel and improved procedures, training, equipment, and software. As a result of the review and analysis being performed by RMB, as an independent third party, and as a result of input from you and your staff, we intend to have an unexceptionable program as soon as practicably possible.

In the meantime, we will be contacting you to schedule a meeting so we can provide a more detailed briefing regarding the initial findings of the review and our intended strategy at this point. If you have any questions in the meantime, please do not hesitate to call me.

Sincerely,



James Chansler
JEA Vice President of O & M
Responsible Official and Designated Representative