

# INTEROFFICE MEMORANDUM

TO: Trina Vielhauer  
THRU: Jeff Koerner *JK*  
FROM: Bruce Mitchell *BM*  
DATE: September 28, 2007  
SUBJECT: JEA - Kennedy Generating Station  
Title V Air Operation Permit Renewal  
PROPOSED Permit Project No. 0310047-016-AV

Attached is the PROPOSED Permit Renewal for the JEA Kennedy Generating Station located at 4215 Talleyrand Avenue, Jacksonville, Duval County. The PROPOSED Determination addresses the comments received on the DRAFT Permit package.

Attachments

TLV/jfk/bm



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

September 28, 2007

*Electronically Sent – Received Receipt Requested*

Mr. James M. Chansler, P.E.  
R.O. and V.P. – Operations and Maintenance  
JEA  
21 West Church Street  
Jacksonville, Florida 32202-3139

Re: PROPOSED Title V Air Operation Permit Renewal  
Project No. 0310047-016-AV  
Kennedy Generating Station

Dear Mr. Chansler:

One copy of the PROPOSED Determination for the Title V permit renewal 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 has become a PROPOSED Title V permit.

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V permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.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

Trina L. Vielhauer  
Chief  
Bureau of Air Regulation

TLV/jfk/rbm

Enclosures

Copy furnished to:

Mr. James M. Chansler, R.O., JEA ([ChanJM@jea.com](mailto:ChanJM@jea.com))

Mr. N. Bert Gianazza, P.E., JEA ([giannb@jea.com](mailto:giannb@jea.com))

Mr. Richard Robinson, ERMD-EQD ([robinson@coj.net](mailto:robinson@coj.net))

Posted for U.S. EPA Region 4 Review

## **PROPOSED Determination**

### JEA's Kennedy Generating Station

Title V Permit Renewal  
PROPOSED Title V Permit  
Project No. 0310047-016-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 August 17, 2007. The Public Notice of Intent to Issue Title V Air Operation Permit Renewal was published in The Florida Times-Union on August 24, 2007. The DRAFT Permit was available for public inspection at 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 September 24, 2007.

#### **II. Public Comment(s).**

Mr. Brian D. O'Neal, with Black & Veatch, submitted comments on behalf of JEA and these were received on September 18, 2007, via e-mail. Based on a review of the comments, the DRAFT Title V Operation Permit Renewal was not changed. Referenced below are the comments and the responses to the comments.

A. E-mail from Mr. Brian D. O'Neal, with Black & Veatch, received September 18, 2007, via e-mail.

##### **1. DRAFT Statement of Basis.**

a. Comment. A reference was made to Section I., Subsection C., Relevant Documents, regarding the Appendices and their incorporation into the permit.

Response. The Appendices are actually incorporated as part of the permit in Section II., Facility-wide Conditions, Condition No. 8. Prior to sending out the DRAFT permit package, an editorial change was made in the DRAFT permit to establish the incorporation of the Appendices in a Facility-wide Condition, not in the Relevant Document part; however, the Statement of Basis did not reflect this change made in the permit. The PROPOSED permit's Statement of Basis is changed to reflect the location of the Facility-wide Condition (No. 8) that is used to incorporate the Appendices into the permit.

##### **2. DRAFT Title V Permit.**

a. Comment. Several references are made in the permit's specific conditions that require that reports be submitted to both the Duval County's Environmental Quality Division and different Department offices, depending on the report required.

Response. After researching the request, the requirements were established through an air construction permit, specifically 0310047-002-AC. Therefore, no changes will be made.

##### **3. Acid Rain Part.**

a. Comment. For the Acid Rain Allowance table in Section IV, Subsection A., Acid Rain Part, the SO<sub>2</sub> allowances allotted to the affected emissions units at the Kennedy Generation Station were listed for reference purposes and are in accordance with Table 2 – Phase II Allowance Allocations, Federal Register/Volume 63, No. 187/Monday, September 28, 1998.

Response. Because the table reflects the correct and stated values, no change is needed.

#### **III. Conclusion.**

The permitting authority will issue the PROPOSED Title V Operation Permit Renewal, No. 0310047-016-AV, with any changes noted above.

## STATEMENT OF BASIS

JEA  
Kennedy Generating Station  
Facility ID No. 0310047  
Duval County

Title V Air Operation Permit Renewal  
PROPOSED Permit Project No. 0310047-016-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 drawings, 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 (CTs), Nos. 3, 4, 5 and 7. The CTs fire virgin No. 2 fuel oil; in addition, simple cycle CT No. 7 also fires natural gas. There is a fuel oil storage tank farm associated with the CTs. Also, included in this permit are miscellaneous unregulated/insignificant emissions units and activities.

The subject of this permit is for the renewal of the Title V Air Operation Permit.

Emissions units Nos. -003, -004 and -005, are existing CTs Nos. 3, 4 and 5 (facility IDs), respectively. CTs Nos. 3, 4 and 5 began commercial operation in 1973. They are allowed to fire new No. 2 fuel oil with a maximum sulfur content of 0.5 %, by weight, but will actually be firing a new No. 2 fuel oil with a sulfur content of 0.05 %, by weight, since there is only one storage tank and CT No. 7 (EU-015) is only permitted to fire this low sulfur content fuel oil. The emissions from CTs Nos. 3, 4 and 5 are uncontrolled. These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required, and are not subject to the regulations of 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. The emissions units are rated at 56.2 megawatts (MW) each. Each turbine has a maximum heat input from virgin No. 2 fuel oil of 744.0 MMBtu @ 70° F, based on the lower heating value (LHV) of the fuel. Each CT has an exhaust stack that is 12.9 feet in diameter and approximately 30 feet tall.

Emissions unit number -015 (facility ID No. 7) is a natural gas and fuel oil fired simple cycle CT rated at a nominal 170 MW and equipped with Dry Low-nitrogen oxides or Dry Low-NO<sub>x</sub> (DLN-2.6) combustors. It was manufactured by General Electric (Model PG7241 7FA) and is designated as CT No. 7. CT No. 7 began commercial operation on April 30, 2000. The maximum heat input from natural gas is 1,623 MMBtu @ 59° F and 60% relative humidity, LHV. The maximum heat input from firing new No. 2 fuel oil is 1,822 MMBtu @ 59° F and 60% relative humidity, LHV. The new No. 2 fuel oil has a maximum sulfur content of 0.05%, by weight. This CT is used as a peaking unit during peak demand times and during emergencies. The exhaust gases exit through a stack that is 24 feet in diameter and 90 feet tall. When firing fuel oil, NO<sub>x</sub> emissions are controlled by water injection. 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.

A Compliance Assurance Monitoring (CAM) plan is not required for CTs Nos. 3, 4 and 5, because there are no specific emissions limiting standards nor any post-combustion controls.

For CT No. 7, there are specific NO<sub>x</sub> emissions limiting standards, a water injection system is used to reduce NO<sub>x</sub> emissions when firing distillate oil, and NO<sub>x</sub> emissions are greater than 100 tons per year. However, a CAM plan is not required because compliance with the NO<sub>x</sub> standards is continuously demonstrated by data collected with the continuous emissions monitoring system (CEMS).

Statement of Basis (cont.)  
JEA  
Kennedy Generating Station  
Title V Air Permit Renewal  
PROPOSED Permit Project No. 0310047-016-AV  
Page 2 of 2

Based on the Title V permit renewal application received May 30, 2007, this facility is not a major source of hazardous air pollutants (HAPs).

Regarding the permit, the following changes were made for permit improvements:

- Based on a request from the applicant, the responsibility of the analysis for the sulfur content of the fuel oil fired in the CTs was clarified for the facility. All related requirements were consolidated for consistency purposes. See conditions A.9. and B.23.(e).
- For permit text reduction and readability, all applicable, identical and repeated requirements related to notification, testing, recordkeeping and reporting for performance testing contained in Rule 62-297.310, F.A.C., were moved and consolidated into Appendix STR, Standard Testing Requirements. Also, see conditions A.10. and B.16.
- All references of the Appendices were consolidated from the permit and listed only once in the Table of Contents. They are referenced and made a part of the permit in a condition in Section II. Facility-wide Conditions, No. 8.
- The latest version of the Title V Conditions, Appendix TV-6, was updated in the affected permit's conditions.
- CAM plan requirements were clarified for the CTs in Section I. Facility Information. Subsection A. Facility Description. From those clarifications, none are required.
- A condition referencing an outdated Operation & Maintenance Plan was removed because the old boilers that were affected have been removed from service.

**TITLE V AIR OPERATION PERMIT**

PROPOSED Permit No. 0310047-016-AV

**Permittee**

JEA  
Kennedy Generating Station  
Facility ID No. 0310047  
Duval County, Florida

**Permitting Authority**

Florida Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Air Permitting North Section  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Telephone: 850/488-0114  
Fax: 850/921-9533

**Compliance Authority**

City of Jacksonville  
Environmental Resource Management Department  
Environmental Quality Division  
117 West Duval Street, Suite 225  
Jacksonville, Florida 32202  
Telephone: 904/630-4900  
Fax: 904/630-3638

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**Permittee:**  
JEA  
21 West Church Street  
Jacksonville, Florida 32202

**PROPOSED Permit No.** 0310047-016-AV  
**Facility ID No.** 0310047  
**SIC No.** 4911  
**Project:** Title V Air Operation Permit  
Renewal

This permit renewal authorizes JEA to operate the Kennedy Generating Station. This facility is located in Duval County at 4215 Talleyrand Avenue, Jacksonville, Florida. The UTM coordinates are: Zone 17, 440.065 km East and 3359.150 km North.

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 drawings, plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Renewal Effective Date:** January 1, 2008  
**Renewal Application Due Date:** July 5, 2012  
**Expiration Date:** December 31, 2012

(Draft)

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Joseph Kahn, Director  
Division of Air Resource Management

JK/tlv/jfk/bm



## SECTION I. FACILITY INFORMATION

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### Subsection A. Facility Description.

This facility consists of four combustion turbines (CTs Nos. 3, 4, 5 and 7) and a fuel oil storage tank farm. All of the combustion turbines fire distillate oil and CT No. 7 also fires natural gas. Also included in this permit are miscellaneous unregulated and insignificant emissions units and activities.

Based on the Title V permit renewal application received May 30, 2007, this facility is not a major source of hazardous air pollutants.

A Compliance Assurance Monitoring (CAM) plan is not required for CTs Nos. 3, 4 and 5, because there are no specific emissions limiting standards nor any post-combustion controls.

For CT No. 7, there are specific nitrogen oxides (NO<sub>x</sub>) emissions limiting standards, a water injection system is used to reduce NO<sub>x</sub> emissions when firing distillate oil, and NO<sub>x</sub> emissions are greater than 100 tons per year. However, a CAM plan is not required because compliance with the NO<sub>x</sub> standards is continuously demonstrated by data collected with the continuous emissions monitoring system (CEMS).

### Subsection B. Emissions Units Summary

#### *Regulated Emissions Units and Activities*

<u>EU No.</u>	<u>Description</u>
-003	CT No. 3
-004	CT No. 4
-005	CT No. 5
-007	Boiler No. 8 (currently deactivated – Acid Rain Unit)
-008	Boiler No. 9 (currently deactivated – Acid Rain Unit)
-009	Boiler No. 10 (currently deactivated – Acid Rain Unit)
-015	CT No. 7 (Acid Rain Unit)

#### *Unregulated Emissions Units and Activities*

<u>EU No.</u>	<u>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 ID Nos. on all correspondence, test report submittals, applications, etc.

## SECTION II. FACILITY-WIDE CONDITIONS

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1. **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's Environmental Resource Management Department - Environmental Quality Division (EQD) 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]
2. **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 Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 1515, Lanham-Seabrook, MD 20703-1515. The telephone number is 301/429-5018. [40 CFR 68]
  - 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]
3. **Notifications and Reports.** The permittee shall submit all compliance related notifications and reports required of this permit to the EQD at the following address: City of Jacksonville, Environmental Resource Management Department, Environmental Quality Division, 117 West Duval Street, Suite 225, Jacksonville, Florida 32202. The EQD telephone number is 904/630-4900 and facsimile number is 904/630-3638. Copies of all such documents shall be submitted to: Department of Environmental Protection, Northeast District, Air Resources, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590. The District telephone number is 904/807-3300 and facsimile number is 904/448-4363.
4. **U.S. EPA Region 4.** 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. The telephone number is 404/562-9155 and the facsimile number is 404/562-9163.
5. **Not federally enforceable. Local Program Regulations.** The facility is subject to the JOC, Title X, Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 376 [Odor Control], and City of Jacksonville Environmental Protection Board (JEPB) Rule 85-1 [Final Rules with Respect to Organization, Procedures, and Practice]. Appendix JEPB provides the applicable rules of the 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.
6. **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. This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. See Condition 51. of Appendix TV-6, Title V Conditions. [Rules 62-213.440(3) and 62-213.900, F.A.C.]
7. **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.]
8. **Appendices.** The Appendices attached to this permit are attached as an enforceable part of the permit unless otherwise indicated.

**SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS**  
**SUBSECTION A. COMBUSTION TURBINES 3, 4 AND 5**

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**EMISSIONS UNITS**

<u>EU No.</u>	<u>Brief Description</u>
-003	CT No. 3
-004	CT No. 4
-005	CT No. 5

Emissions units -003, -004 and -005 are CTs manufactured by Westinghouse (Model W501G) and are designated as CTs No. 3, No. 4 and No. 5, respectively. CTs Nos. 3, 4 and 5 began commercial operation in 1973. Each CT has a maximum heat input from distillate oil of 744.0 MMBtu @ 70° F, LHV (lower heating value). The distillate oil has a maximum sulfur content of 0.5%, by weight. These CTs 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 CTs 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. Each CT has an exhaust stack that is 12.9 feet in diameter and approximately 30 feet tall.

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.

**ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS**

**A.1. Permitted Capacity.** The maximum heat input rate for each CT is 744.0 MMBtu/hour based on the LHV of distillate oil and a compressor inlet temperature of 70° F. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; AO16-173880; and Application No. 0310047-016-AV]

**A.2. Emissions Unit Operating Rate Limitation After Testing.** See Appendix STR of this permit. [Rule 62-297.310(2), F.A.C.]

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

**A.4. Hours of Operation.**

- a. The CTs may operate continuously (8760 hours/year).
- b. Each CT shall not exceed 399 hours of operation per year while using foggers.

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

**EMISSION LIMITATIONS AND STANDARDS**

{Permitting Note: Unless otherwise specified, the averaging time is based on the specified averaging time of the applicable test method.}

**A.5. Visible Emissions (VE).** VE from each CT shall not be equal to or greater than 20 percent opacity. [Rule 62-296.320(4)(b)1., F.A.C. and AO16-173880]

**A.6. Fuel Sulfur Content.** The sulfur content of the distillate oil shall not exceed 0.5 percent, by weight. Compliance with the liquid fuel sulfur content limit shall be by fuel analysis. [0310047-001-AV; AO16-173880; and Application No. 0310047-016-AV]

**EXCESS EMISSIONS**

**A.7. Excess Emissions, Allowed.** See Appendix CC of this permit. [Rule 62-210.700(1), F.A.C.]

**A.8. Excess Emissions, Prohibited.** See Appendix CC of this permit. [Rule 62-210.700(4), F.A.C.]

**SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS**  
**SUBSECTION A. COMBUSTION TURBINES 3, 4 AND 5**

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**MONITORING OF OPERATIONS**

**A.9. Fuel Oil Sulfur Content.** For demonstration of compliance with the liquid fuel sulfur content limit, the fuel 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. For each shipment, the permittee shall retain records of the fuel sulfur analysis. [Rule 62-213.440, F.A.C.; 40 CFR 60.335(d) & (e); and Application No. 0310047-016-AV]

**TEST METHODS AND PROCEDURES**

**A.10. Testing Requirements.** See Appendix STR (Stack Testing Requirements) of this permit for notification, testing, recordkeeping and reporting requirements regarding a performance test. [Chapter 62-297, F.A.C.]

**A.11. VE Tests.** The test method for VE shall be EPA Method 9. [Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

**A.12. Fuel Oil Sulfur Analysis.** 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. VE Testing.** By this permit, biennial (odd years) emissions compliance testing for VE is required for each emissions unit, but is not required for those emissions units burning distillate 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.14. Excess Emissions, Notification.** See Appendix CC of this permit. [Rule 62-210.700(6), F.A.C.]

**A.15. Distillate Oil Consumption.** Records of distillate oil consumption shall be maintained and made available to the Department and/or the EQD office(s) upon request. [Rule 62-213.440, F.A.C. and AO16-173880]

**A.16. 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. [Rule 62-4.070(3), F.A.C.]

**SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS**  
**SUBSECTION B. COMBUSTION TURBINE 7**

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**EMISSIONS UNITS**

<u>EU No.</u>	<u>Description</u>
-015	CT No. 7

Emissions unit -015 is a CT manufactured by General Electric (Model PG 7241 FA) and is designated as CT No. 7. CT No. 7 began commercial operation on April 30, 2000, and replaced Boiler No. 10 (EU No. -009) identified by JEA as KE10. It is a simple cycle unit consisting of a nominal 170 MW (at 59° F) CT-electrical generator set equipped with Dry Low NO<sub>x</sub> (DLN-2.6) combustors. The maximum heat input from firing natural gas is 1623 MMBtu/hour based on a compressor inlet temperature 59° F, 60% relative humidity, and the LHV of gas. The maximum heat input from firing distillate oil is 1822 MMBtu based on a compressor inlet temperature of 59° F, 60% relative humidity, and the LHV of oil. CT No. 7 is a peaking unit used during peak demand times and emergencies. Exhaust gas exits a stack that is 24 feet in diameter and 90 feet tall.

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, F.A.C.; and 40 CFR 60, Subpart A, adopted by reference in Rule 62-204.800, F.A.C.

**ESSENTIAL PTE PARAMETERS**

**B.1. Permitted Capacity.** Based on 100% load, the LHV of each fuel, a compressor inlet temperature of 59° F and ambient conditions of 60% relative humidity and 14.7 psi, the maximum heat input rates for CT No. 7 are:

<u>EU No.</u>	<u>MMBtu/hour</u>	<u>Fuel Type</u>
7	1623.0	Natural Gas
	1822.0	Distillate Oil

The maximum heat input rate will vary depending upon the CT inlet conditions and the CT characteristics. Manufacturer's curves corrected for site conditions or equations for correction to other ambient conditions shall be provided to the Department and/or the EQD office(s) upon request. [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.21**. [Rule 62-297.310(2), F.A.C.]

**B.3. Methods of Operation, Fuels.** CT No. 7 shall fire only natural gas and new No. 2 distillate oil, or better. [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 CT No. 7 are 4050 hours on natural gas and 1260 hours on distillate 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. DLN Combustion.** DLN combustors shall be installed and operated on CT No. 7 to control NO<sub>x</sub> emissions when firing natural gas. The DLN combustion system shall be tuned to optimize emissions reductions and shall be maintained to minimize NO<sub>x</sub> emissions and carbon monoxide (CO) emissions. [0310047-002-AC]

**SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS**  
**SUBSECTION B. COMBUSTION TURBINE 7**

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**B.6. Water Injection System, Oil Firing.** A water injection system shall be installed and operated to control NO<sub>x</sub> emissions when firing distillate oil. [0310047-002-AC]

**EMISSION LIMITATIONS AND STANDARDS**

{Permitting Note: Unless otherwise specified, the averaging time is based on the specified averaging time of the applicable test method.}

**B.7. VE and Particulate Matter (PM) Emissions.** VE shall not exceed 10 percent opacity when firing natural gas or distillate oil. {Permitting Note: Permit No. 0310047-002-AC specified a PM emissions limit of 17 lbs/hour (non-condensable only) when firing distillate oil. As allowed by this permit, the permittee elected an opacity limit of 10 percent when firing oil in lieu of the PM emissions limit and testing requirement.} [0310047-002-AC and Application No. 0310047-016-AV]

**B.8. Sulfur Content, Distillate Oil.** The sulfur content of distillate oil shall not exceed 0.05 percent, by weight. [0310047-002-AC]

**B.9. NO<sub>x</sub> Emissions, Natural Gas.** While burning natural gas, the concentration of NO<sub>x</sub> in the exhaust gas shall not exceed 15 ppmvd at 15% oxygen (O<sub>2</sub>) based on 24-hour block average as measured by the CEMS maintained in accordance with 40 CFR 75. In addition, NO<sub>x</sub> emissions calculated as NO<sub>2</sub> shall exceed neither 15 ppmvd at 15% O<sub>2</sub> nor 99 lbs/hour to be demonstrated by stack test. Total annual NO<sub>x</sub> emissions shall not exceed 200 tons on a 12-month rolling total basis from firing any combination of permitted fuels. [0310047-002-AC; 0310047-013-AC; Rule 62-212.400(12)(b), F.A.C.; and 40 CFR 75]

**B.10. NO<sub>x</sub> Emissions, Distillate Oil.** While burning distillate oil, the concentration of NO<sub>x</sub> in the exhaust gas shall not exceed 42 ppmvd at 15% O<sub>2</sub> based on a 24-hour block average as measured by the CEMS maintained in accordance with 40 CFR 75. In addition, NO<sub>x</sub> emissions calculated as NO<sub>2</sub> shall exceed neither 42 ppmvd at 15% O<sub>2</sub> nor 318 lbs/hour to be demonstrated by stack test. Total annual NO<sub>x</sub> emissions shall not exceed 200 tons on a 12-month rolling total basis from firing any combination of permitted fuels. [0310047-002-AC; 0310047-013-AC; Rule 62-212.400(12)(b), F.A.C.; and 40 CFR 75]

**B.11. 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 shall not exceed 48 lbs/hour (natural gas) and 97 lbs/hour (fuel oil) to be demonstrated by stack test. [0310047-002-AC and 0310047-013-AC]

**B.12. 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 (distillate oil) as determined by EPA Methods 18, 25 or 25A. VOC emissions shall not exceed 2.9 lbs/hour (natural gas) and 19 lbs/hour (distillate oil). [0310047-002-AC and 0310047-013-AC]

**B.13. Sulfur Dioxide (SO<sub>2</sub>) Emissions.** SO<sub>2</sub> emissions shall not exceed 9.7 lbs/hour when firing pipeline natural gas and 98 lbs/hour when firing distillate oil. Emissions of SO<sub>2</sub> shall not exceed 62 tons per year. Compliance with these limits shall be demonstrated by complying with the fuel sulfur monitoring and fuel consumption monitoring requirements of this subsection. [0310047-002-AC; 0310047-013-AC; and Rule 62-212.400(12)(b), F.A.C.]

**SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS**  
**SUBSECTION B. COMBUSTION TURBINE 7**

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**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.14. Excess Emissions, Allowed.** See Appendix CC of this permit. [Rule 62-210.700(1), F.A.C.]

**B.15. Excess Emissions, Prohibited.** See Appendix CC of this permit. [Rule 62-210.700(4), F.A.C.]

**PERFORMANCE TEST METHODS AND PROCEDURES**

**B.16. Testing Requirements.** See Appendix STR (Stack Testing Requirements) of this permit for notification, testing, recordkeeping and reporting requirements regarding a performance test. [Chapter 62-297, F.A.C.]

**B.17. Test Methods.** When conducting emissions tests, the following reference methods shall be used.

- a. EPA Method 5 or 17, "Determination of Particulate Emissions from Stationary Sources".
- b. EPA Method 9, "Visual Determination of the Opacity of Emissions from Stationary Sources".
- c. EPA Method 10, "Determination of Carbon Monoxide Emissions from Stationary Sources".
- d. EPA Method 20, "Determination of Nitrogen Oxides, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines".
- e. EPA Reference Method 18 or 25 and/or 25A, "Determination of Volatile Organic Concentrations".

No other test methods may be used for compliance testing unless prior Department approval is received in writing. These reference methods are provided in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. [40 CFR 60; 40 CFR 60.8; and 0310047-002-AC]

**B.18. Annual Tests Required.** During each federal fiscal year (October 1 - September 30), an annual compliance tests shall be performed in accordance with the specified EPA Reference methods for the following pollutants.

- a. CO Emissions: Annual compliance testing for CO may be conducted at less than capacity when compliance testing is conducted concurrent with the annual NO<sub>x</sub> RATA testing, which is performed pursuant to 40 CFR 75. [0310047-002-AC; 40 CFR 60; 40 CFR 75; and Rule 62-297.310(7), F.A.C.]
- b. NO<sub>x</sub> Emissions: Annual compliance testing for NO<sub>x</sub> is not required. Continuous compliance with the NO<sub>x</sub> standards shall be demonstrated by the CEMS maintained in accordance with 40 CFR 75. {Permitting Note: The permittee conducted initial tests in accordance with EPA Method 20 to demonstrate compliance with Subpart GG in 40 CFR 60.} [0310047-002-AC; 40 CFR 60; and 40 CFR 75]
- c. VOC Emissions: No annual testing is required. Compliance with the CO emission limit serves as a surrogate. {Permitting Note: Pursuant to Permit No. 0310047-002-AC, the permittee conducted initial tests in accordance with EPA Method 25A to demonstrate compliance with VOC standards.} [0310047-002-AC]
- d. PM Emissions: No annual testing is required. Pursuant to Permit No. 0310047-002-AC, the permittee elected an opacity limit of 10 percent when firing oil in lieu of the PM limit and testing requirement. [0310047-002-AC and applicant requested]
- e. VE: An annual performance test is required to determine VE. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a compliance test once per each five-year period, coinciding with the term of its air operation permit. {Permitting Note: Permit No. 0310047-002-AC specified a PM emissions limit of 17 lbs/hour (non-condensable only) when firing distillate oil. As allowed

**SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS**  
**SUBSECTION B. COMBUSTION TURBINE 7**

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by this permit, the permittee elected an opacity limit of 10 percent when firing oil in lieu of the PM emissions limit and testing requirement.} [0310047-002-AC; Rule 62-297.310(7)(a)8., F.A.C.; and applicant requested]

f. SO<sub>2</sub> Emissions: No annual testing is required. Compliance with these limits shall be demonstrated by complying with the fuel sulfur monitoring and fuel consumption monitoring requirements of this subsection. [0310047-002-AC; 40 CFR 60; and 40 CFR 75]

**B.19. Continuous Compliance with the NO<sub>x</sub> Emission Limits.** Continuous compliance with the NO<sub>x</sub> emission limits shall be demonstrated with the CEMS 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<sub>x</sub> concentrations are obtained at least 15 minutes apart. These excess emissions periods shall be reported as required in specific conditions **B.29.**, **B.30.** and **B.31.** [0310047-002-AC and 40 CFR 75]

**B.20. Compliance with the SO<sub>2</sub> and PM/PM<sub>10</sub> Emission Limits.** Notwithstanding the requirements of Rule 62-297.310(7), F.A.C., the method for determining compliance with the SO<sub>2</sub> and PM<sub>10</sub> standards is the use of natural gas (2 grains per 100 standard cubic feet, maximum) and distillate oil (0.05% sulfur by weight, maximum). [0310047-002-AC]

**B.21. Operating Rate During Testing.** Compliance testing shall be conducted with CT No. 7 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 the CT 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. Once the 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. 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: The GE Heat Input Curves provided by the manufacturer are the nominal values to be used to aid in defining "full load" for stack testing purposes and do not constitute a limit on heat input.} [Rule 62-297.310(2), F.A.C. and 0310047-007-AC]

### **MONITORING OF OPERATIONS**

**B.22. 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 is committed 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)).
- b. This unit shall be monitored for SO<sub>2</sub> emissions using methods consistent with the requirements of 40 CFR 75.11 and certified by the EPA.. This custom fuel monitoring schedule will only be valid when pipeline natural gas is used as a primary fuel. If the primary fuel for this unit is changed to a higher sulfur fuel, SO<sub>2</sub> emissions must be accounted for as required pursuant to 40 CFR 75.11(d). [0310047-002-AC; 40 CFR 60; and 40 CFR 75]



**SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS**  
**SUBSECTION B. COMBUSTION TURBINE 7**

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**B.23. Fuel Oil Monitoring Schedule.**

- a. For the purposes of demonstrating compliance with the SO<sub>2</sub> standard specified in this permit, the SO<sub>2</sub> standard in 40 CFR 60.333 and the limits on fuel sulfur content, the following sampling and analytical methods shall be used: ASTM D2880-71, 78 or 96, or D4294-98 (or equivalent) for the sulfur content of liquid fuels; and D1072-80 or 90 (Reapproved 1994), D3031-81, D4084-82 or D3246-81 or 94, or D3246-81, 92 or 96 (or equivalent) for the sulfur content of gaseous fuel. The owner or operator are responsible for ensuring that the procedures above are used for determination of fuel sulfur content.
- b. 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(d) and (e). For each shipment, the permittee shall retain records of the fuel sulfur analysis.

[0310047-002-AC; 0310047-013-AC; 40 CFR 60.335(d) & (e)]

**B.24. NO<sub>x</sub> and O<sub>2</sub> CEMS.** The permittee shall install, calibrate, maintain, and operate a CEMS in the stack to measure and record the NO<sub>x</sub> emissions and the O<sub>2</sub> content from this unit. Periods when NO<sub>x</sub> emissions (ppmv 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 and the EQD pursuant to 40 CFR 75. [0310047-002-AC and 40 CFR 75]

**B.25. NO<sub>x</sub> CEMS in Lieu of Water-to-Fuel Ratio.** The NO<sub>x</sub> CEMS shall be used in lieu of the water-to-fuel ratio monitoring system for reporting excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG. The calibration of the water-to-fuel ratio monitoring device required in 40 CFR 60.335(c)(2) will be replaced by the 40 CFR 75 certification tests of the NO<sub>x</sub> CEMS. Upon request from the Department and/or the EQD, the CEMS emission rates for NO<sub>x</sub> shall be corrected to ISO conditions to demonstrate compliance with the NO<sub>x</sub> standard in 40 CFR 60.332. [0310047-002-AC; 40 CFR 60; and 40 CFR 75]

**B.26. CEMS Requirements.** The NO<sub>x</sub> and O<sub>2</sub> CEMS 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 CEMS equipment specifications, manufacturer, type, calibration and maintenance needs shall be kept on file for future reference and use. [0310047-002-AC; 40 CFR 60; and 40 CFR 75]

**RECORDKEEPING AND REPORTING REQUIREMENTS**

**B.27. 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 years following the date on which such measurements, records, or data are recorded. These records shall be made available to Department and/or EQD representatives upon request. [Rule 62-213.440, F.A.C. and 0310047-002-AC]

**B.28. Distillate Oil Consumption.** Records of the distillate oil consumption shall be maintained and made available to the Department and/or the EQD office(s) upon request. [Rule 62-213.440, F.A.C.]

**B.29. Excess Emissions, Notification.** See Appendix CC of this permit. [Rules 62-210.700(6) and 62-4.130, F.A.C. and 0310047-002-AC]

**B.30. Quarterly Excess Emissions Reports, Subpart GG.** With regard to the emissions standards in Subpart GG of 40 CFR 60, quarterly excess emission reports shall be submitted to the Department and EQD offices in accordance with 40 CFR 60.7(c). This unit shall comply with the CEMS frequency data report as specified in 40 CFR 60.7(c). Quarterly reports are due within 30 days following each calendar quarter. [0310047-002-AC; 0310047-013-AC; and 40 CFR 60.7(c)]

**SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS**  
**SUBSECTION B. COMBUSTION TURBINE 7**

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**B.31. Quarterly Excess Emissions Reports, Permit Standards.** 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 subsection. Following the same format in 40 CFR 60.7, quarterly excess emission reports shall be submitted to the Department and EQD offices. Quarterly reports are due within 30 days following each calendar quarter. [0310047-002-AC and 0310047-013-AC]

**MISCELLANEOUS**

**B.32. 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.33. New Source Performance Standards (NSPS).** CT No. 7 shall be in compliance with the applicable provisions of Subparts A and GG in 40 CFR 60 adopted by reference in Rule 62-204.800, 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 standards. See Appendix NA for the General Provisions and Appendix NGG for the Performance Standards for Stationary Gas Turbines. [0310047-002-AC and Subparts A and GG in 40 CFR 60]

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**SECTION IV. ACID RAIN PART**

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**Operated by: JEA**

**ORIS code: 0666**

**SUBSECTION A. ACID RAIN UNITS**

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

<u>EU No.</u>	<u>Description</u>
-007	Boiler No. 8 (currently deactivated)
-008	Boiler No. 9 (currently deactivated)
-009	Boiler No. 10 (currently deactivated)
-015	Combustion Turbine #7 (start-up April 30, 2000)

**A.1. Acid Rain Applications.** The permit applications (DEP Form Nos. 62-210.900(1)(a) and 62-210.900(1)(a)3., F.A.C.) submitted for this facility, as approved by the Department, are a part of this permit. The owners and operators of these acid rain units must comply with the standard requirements and special provisions set forth in the applications received on 06/07/2007 and 07/31/2007. [Chapter 62-213 and Rule 62-214.320, F.A.C.]

**A.2. Summary of SO<sub>2</sub> Allowances.** The following table summarizes the SO<sub>2</sub> allowance allocations for each Acid Rain unit:

E.U. No.	EPA ID	SO <sub>2</sub> Allowances* for Each Year				
		2008	2009	2010	2011	2012
-007	8	196*	196*	196*	196*	196*
-008	9	553*	553*	553*	553*	553*
-009	10	1975*	1975*	1980*	1980*	1980*
-015	7	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 EPA under Table 2 of 40 CFR 73.

**A.3. Emissions 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.

a. 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.

b. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.

c. 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 days after the end of the calendar year. [Rule 62-214.420(11), F.A.C.]

**A.5. Comments, Notes and Justifications.** None.

**Mitchell, Bruce**

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**From:** O'Neal, Brian D. [ONealBD@bv.com]  
**Sent:** Tuesday, September 18, 2007 11:52 AM  
**To:** Mitchell, Bruce  
**Cc:** Gianazza, N. Bert  
**Subject:** JEA Comments on Kennedy Generating Station DRAFT Title V Permit

Bruce,  
Please accept the subject comments on behalf of JEA.

- *Draft SOB, Permit Changes*, third bullet reads "All references of the Appendices were consolidated from the permit and listed only once in the Table of Contents. They are referenced and made a part of the permit in a condition in Section I. Facility Information. Subsection C. Appendices." However, no Subsection C is listed in Section I. Facility Information.
- JEA requests that the various reporting requirements found throughout the draft permit be made to only one entity to reduce the burden in double reporting. JEA feels that this double reporting is redundant and unnecessary. To be consistent other conditions in the draft permit, it is requested that the reporting authority be the EQD where ever possible as it has the enforcement authority necessary to monitor JEA's actions. To that end, the following is a list of the remaining conditions in the draft permit that currently require some sort of reporting or notification to two entities and that JEA is interested in reducing to one entity:
- Facility-wide Condition 3 requires that all compliance information be submitted to the ERMD-EQD and further requests that copies of all documents be submitted to the Northeast District Office. JEA believes there is no need for copies to be sent to the Northeast District Office and requests the removal of that portion of the condition. If removal is not possible, JEA requests that the wording be changed to indicate copies be sent if requested by the Northeast District Office.
  - Condition B.24. (dealing with NOx emissions above the standards), requires that periods of such time be submitted to "the Department's Bureau of Air Monitoring and Mobile Sources and the EQD." JEA requests that the Bureau be removed. If removal is not possible, JEA requests that the AND changed to an OR.
  - Conditions B.30. and B.31. (dealing with Quarterly Excess Emission Reports) require that quarterly excess emission reports be submitted to the "Department and EQD offices." This is a change from the current permit condition B.40. (Quarterly Reports) which required quarterly excess emission reports to be submitted to the EQD office only. JEA requests that the Department be removed. If removal is not possible, JEA requests that the AND changed to an OR.
- I believe you are currently updating the SO2 allowances listed in the draft permit, but you asked that I make comment of it anyway for your reference. I did pull a report down from the Clean Air Markets website in an "Acid Rain Program Initial Allowance Allocation Report" that show slight differences in the allocations for each of the units than those that appear in the draft Title V permit. Here's a summary of the differences for the 2008-2012 period.

Unit No.

Draft Permit (2008-2012)

CAMD		
8	193	196 (2008-2012)
9	547	553 (2008-2012)
10	1959	1976 (2008-2009), 1980 (2010-2012)

Please let me know if you have any questions about these comments.

9/18/2007

Best Regards,  
Brian

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**Brian O'Neal | Air Quality Scientist**  
**Black & Veatch - Building a World of Difference™**  
11401 Lamar Avenue  
Overland Park, KS 66211  
Phone: **(913) 458-8199** | Fax: **(913) 458-8199**  
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*This communication is intended solely for the benefit of the intended addressee(s). It may contain privileged and/or confidential information. If this message is received in error by anyone other than the intended recipient(s), please delete this communication from all records, and advise the sender via electronic mail of the deletion.*

9/18/2007

**Friday, Barbara**

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**To:** 'chanjm@jea.com'; Gianazza, N. Bert; 'ROBINSON@coj.net'  
**Cc:** Mitchell, Bruce  
**Subject:** PROPOSED Title V Permit Renewal No.: 0310047-016-AV - JEA - Kennedy Generating Station  
**Attachments:** 0310047016ProposedCoverLetter.pdf;  
0310047.016.AV.Renewal.JEA.Kennedy.Appendices.2.pdf;  
0310047.016.AV.Renewal.JEA.Kennedy.PROPOSED.SOB.pdf;  
0310047.016.TV.Renewal.JEA.Kennedy.PD.pdf; 0310047p.016 - Jeff-1.pdf

Dear Sir/Madam:

A copy of the "PROPOSED PERMIT DETERMINATION" and the related permit documents for the above referenced facility are attached. This e-mail is being provided as a courtesy to inform you that the DRAFT permit has become a PROPOSED permit, and that the PROPOSED permit has been transmitted to the USEPA for their review.

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

The attached document(s) is(are) in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:  
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

9/28/2007

## Friday, Barbara

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**From:** System Administrator  
**To:** Mitchell, Bruce  
**Sent:** Friday, September 28, 2007 2:41 PM  
**Subject:** Delivered:PROPOSED Title V Permit Renewal No.: 0310047-016-AV - JEA - Kennedy Generating Station

Your message

**To:** 'chanjm@jea.com'; 'Gianazza, N. Bert'; 'ROBINSON@coj.net'  
**Cc:** Mitchell, Bruce  
**Subject:** PROPOSED Title V Permit Renewal No.: 0310047-016-AV - JEA - Kennedy Generating Station  
**Sent:** 9/28/2007 2:41 PM

was delivered to the following recipient(s):

Mitchell, Bruce on 9/28/2007 2:41 PM

**Friday, Barbara**

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**From:** Exchange Administrator  
**Sent:** Friday, September 28, 2007 2:41 PM  
**To:** Friday, Barbara  
**Subject:** Delivery Status Notification (Relay)

**Attachments:** ATT370232.txt; PROPOSED Title V Permit Renewal No.: 0310047-016-AV - JEA - Kennedy Generating Station



ATT370232.txt  
(355 B)



PROPOSED Title V  
Permit Renewa...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

chanjm@jea.com  
GianNB@jea.com



## Friday, Barbara

---

**From:** Exchange Administrator  
**Sent:** Friday, September 28, 2007 2:41 PM  
**To:** Friday, Barbara  
**Subject:** Delivery Status Notification (Relay)

**Attachments:** ATT370237.txt; PROPOSED Title V Permit Renewal No.: 0310047-016-AV - JEA - Kennedy Generating Station



ATT370237.txt  
(283 B)

PROPOSED Title V  
Permit Renewa...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

ROBINSON@coj.net

## Friday, Barbara

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**From:** Gianazza, N. Bert [GianNB@jea.com]  
**To:** Friday, Barbara  
**Sent:** Monday, October 01, 2007 8:45 AM  
**Subject:** Read: PROPOSED Title V Permit Renewal No.: 0310047-016-AV - JEA - Kennedy  
Generating Station

Your message

**To:** GianNB@jea.com  
**Subject:**

was read on 10/1/2007 8:45 AM.

## Friday, Barbara

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**From:** Robinson, Richard [ROBINSON@coj.net]  
**To:** Friday, Barbara  
**Sent:** Friday, September 28, 2007 3:13 PM  
**Subject:** Read: PROPOSED Title V Permit Renewal No.: 0310047-016-AV - JEA - Kennedy  
Generating Station

Your message

**To:** ROBINSON@coj.net  
**Subject:**

was read on 9/28/2007 3:13 PM.

## Friday, Barbara

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**From:** Chansler, James M. - Chief Operating Officer [ChanJM@jea.com]  
**To:** undisclosed-recipients  
**Sent:** Friday, September 28, 2007 3:10 PM  
**Subject:** Read: PROPOSED Title V Permit Renewal No.: 0310047-016-AV - JEA - Kennedy  
Generating Station

Your message

**To:** ChanJM@jea.com  
**Subject:**

was read on 9/28/2007 3:10 PM.