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Jacksonville, Florida 32202-3139

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BUREAU OF AIR REGULATION



Bruce Thomas
North Permitting Section
Bureau of Air Regulation
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road,
Tallahassee, FL 32399-2400

Subject: Draft Construction Permit for JEA Kennedy Generating Station CT8
Permit No. PSD-FL-386

E L E C T R I C

Dear Mr. Thomas:

W A T E R

JEA has reviewed the draft construction permit (Draft Permit No. PSD-FL-386) for JEA Kennedy Generating Station (KGS) Combustion Turbine No. 8 (CT8). The following are our comments and/or requests regarding the draft permit:

S E W E R

1. JEA no longer goes by Jacksonville Electric Authority. Please change Jacksonville Electric Authority to JEA in the following:
 - a. Page 1 of the draft permit under permittee.
 - b. The heading of the intent to issue letter.
 - c. The header on page 2 of the intent to issue letter.
 - d. In facility location description on page 2 of the intent to issue letter.
 - e. In applicant description on first page of Public Notice of Intent to Issue Air Permit document (page 5 of the Intent to issue pdf).
 - f. On page one of the Technical Evaluation & Preliminary Determination (TEPD) document under Applicant.
2. In some instances the location of JEA's main offices is incorrectly listed as the location of the facility. Please change the address of the facility from 21 West Church Street to 4215 Talleyrand Avenue in the following:
 - a. The first sentence of the intent to issue letter.
 - b. In facility location description on page 2 of the intent to issue letter.
 - c. In facility location description on first page of Public Notice of Intent to Issue Air Permit document (page 5 of the Intent to issue pdf file).
3. There is an inconsistency between the averaging time given in footnote b of the Emissions Standard Table given in Section 3 Condition 12 of the draft permit and the averaging time given in the Table. We request that the averaging time given in footnote b be changed to a 4-hour rolling average to match the averaging time given in the table. This comment also applies to the table in Section 4 Appendix D of the draft permit.
4. JEA requests that a sentence be added to footnote b of the table in Condition 12 of Section 3 to clarify that compliance with the NO_x mass emission limits are only to be demonstrated as part of the initial CO compliance testing. We request the addition of the following to footnote b: "Compliance with the lb/hr NO_x emission limit is to be demonstrated with an initial compliance test only. These are not ongoing or rolling limits. No subsequent

compliance demonstration is required.” This comment also applies to the table in Section 4 Appendix D of the draft permit.

5. JEA requests that reference to evaporative cooling be removed from Section 3 Condition 8. The permit application did not include use of evaporative cooling and there is no plan to use evaporative cooling on CT8.
6. EPA Reference Method (RM) 20 essentially no longer exists. All NO_x testing (including NO_x testing on stationary gas turbines) is now performed using RM 7E. We request that the reference to Method 20 in the Table in Section 3 Condition 16 be removed. We request that the reference to Method 20 in Section 3 Condition 23(a) be removed.
7. We request that the last sentence of Section 3 Condition 17 be deleted. The permit already includes the appropriate conditions to show compliance with the permit limits and a blanket condition such as this is not necessary.
8. The heading for Section 3 Condition 18 is Testing Prior to Renewal, which implies that the visible emissions (VE) testing will be required every five years, coinciding with the Title V renewal. However, the condition requires annual VE testing. Per Rule 62-297.310(7)(a)8, JEA requests that this condition include a stipulation whereby VE testing is not required if the unit is not operated for more than 400 hours in a year. This additional provision could read as follows: “If the unit does not operate for more than 400 hours during a federal fiscal year, then an annual visible emissions test is not required. If annual visible emissions testing is not required due to this exclusion, a visible emissions compliance test shall be conducted once per each five-year period, coinciding with the term of its air operation permit.”
9. JEA requests that Section 3 Condition 22 be removed and replaced with a condition that stipulates allowable excess emissions during startup, shutdown, or malfunction as allowed by rule. There is no opacity monitor to show compliance with this condition, GE has no guarantee on opacity during startup or shutdown, and emissions associated with this unit are minimal. We request that Condition 3 from Section 4 Appendix C (Common Conditions) of the permit be added as Condition 22 to clearly state that excess emissions during startup, shutdown, or malfunction are allowed by rule for 2 hours in any 24 hour period. We also request that this condition allow for excess emissions during fuel switching for 2 hours in any 24 hour period.
10. We request that conditions be added to the permit to allow for excess emissions during DLN tuning sessions. We request that the following condition, which is similar to conditions included in other recent FDEP permits, be added to the KGS CT8 permit:
“DLN tuning: CEMS data collected during initial or other DLN tuning sessions may be excluded from the compliance demonstrations provided the tuning session is performed in accordance with the manufacturer’s specifications or determined best practices. The permittee shall provide the Compliance Authority with notification of tuning within one business day if excess emissions occur as a result of tuning activities. The notice may be by telephone, facsimile transmittal, or electronic mail.” Note that this wording may be slightly different than similar conditions in other recent FDEP permits in that we request that notification not be required prior to tuning, but instead be required if the tuning results in excess emissions. Unit tuning is performed remotely and if deemed necessary commences within hours of determining that tuning is required. This tuning minimizes emissions through prompt action. Since it is not possible to notify the agency prior to tuning without potentially negative environmental impacts and/or losing the availability of one of our cleanest units for one or more days, and since the vast majority of tuning events do not result in exceedance of any limit, we request that this requirement be written to require notification of tuning within one business day if excess emissions occur as a result of tuning activities.

11. JEA requests that the requirement to monitor the heat content of the fuel daily be removed from Section 3 condition 24. This is not required by 40 CFR 75 Appendix D and is not practical. It is requested that the second sentence of this condition be revised to read "This shall be achieved through monitoring in accordance with the provisions of 40 CFR 75 Appendix D."
12. JEA requests that the first sentence of Section 3 condition 25 be revised to read as follows: "The permittee shall record the following for each fuel in a written or electronic log for the combustion turbine for the previous month of operation: hours of operation for the month and for the rolling 12 month total."
13. JEA requests that the specificity of Section 3 Condition 29a be removed to simply require the reporting requirements of Subpart KKKK. We request that this condition be changed to read as follows: "The permittee shall follow the reporting requirements of 40 CFR 60 Subpart KKKK (Standards of Performance for Stationary Combustion Turbines)."
14. Section 3 Condition 29b essentially provides for malfunction notification as required by Rule 62-210.700(6), F.A.C. JEA requests that this condition be changed to simply state this rule, with this condition reading as follows: "In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunction shall be submitted in a quarterly report, if requested by the Department." We also request that the first, third and fifth rule reference for this condition be removed as they have little relevance to this condition.
15. Table 1A of the Technical Evaluation and Preliminary Determination gives the CT8 heat input rates with the notation (LHV). These rates should be noted as HHV.

JEA appreciates the opportunity to work with the Florida Department of Environmental Protection in obtaining the required air quality permits for the JEA Kennedy Generating Station. Should you have any questions or concerns regarding the above comments on the draft permit, please do not hesitate to call me at (904) 665-5501.

Regards,



David Norse
Environmental Services
JEA