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Mr. Tom Cascio
Office of Permitting and Compliance
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road, MS-5505
Tallahassee, Florida 32399-2400

**Re: JEA – Kennedy Generating Station, Permit No. 0310047-021-AV,
Title V Air Operation Permit Renewal**

Mr. Cascio:

JEA offers the following comments regarding the Florida Department of Environmental Protection's ("Department") issuance of Draft/Proposed Title V Air Operation Permit Renewal No. 0310047-021-AV (the "Draft Renewal"), which is a renewal of Title V Air Operation Permit No. 0310047-016-AV (the "Existing Permit"). Comments on the Draft Renewal are due by October 26, 2012, and are hereby timely submitted.

Statement of Basis:

1. On page 1 of 2: For consistency and clarity, JEA requests the Department revise the CT No. 8 Model description as follows:

Emissions unit 016 is a combustion turbine (CT) manufactured by the General Electric Company (Model PG7241-7 FA) and is designated as CT No. 8.

2. On page 2 of 2, Request No. 1: JEA renews its request that for Combustion Turbine 7 (EU 015), the Department relax carbon monoxide testing frequency from annual to once every five years, similar to the testing requirement for Combustion Turbine 8. The Department states in its response to Request No. 1 that CT 7's potential carbon monoxide emissions are greater than 100 tons per year, and, therefore, annual testing is required by Rule 62-297.301(7). However, as reflected in Condition A.4 and A.11 and in JEA's May 2012 Application for Title V Renewal, CT 7 (EU No. 15) is subject to an emission limit of 48 lbs/hour and 4,050 hours of operation for natural gas. Thus, CT 7's potential to emit is 92.2

2. tons (48 lbs/hr * 4,050 hrs/yr * 1 ton/2,000 lb = 97.2 tons/yr), less than 100 tons per year (i.e., not greater than 100 tons per year as indicated in the Department’s response to Request No. 1).
3. On page 2 of 2, in the response to Request No. 2: JEA requests the following correction to a referenced permit number:

However, this clarification appears to have accidentally not been carried through into permit No 03100467-019-AC, which made other minor revisions to the original construction permit (No. 0310047-015-AC) for this unit.

Draft/Proposed Title V Air Operation Permit Renewal No. 0310047-021-AV:

1. Table of Contents:
 - a. Section II begins on page 4 (not 3).
 - b. Section V begins on page 24 (not 23).
 - c. Section VI begins on page 30 (not 29).
 - d. “Appendix A, Glossary” under Section VI Appendices should be revised to “Appendix A, Glossary—Abbreviations, Acronyms, citations, and identification of numbers.”
2. Pagination throughout the Draft Renewal: “Page __ of 2930.”
3. On page 3 of 29: JEA requests the addition of Permit No. 0310047-013-AC to list of air construction permits regulating Unit 7 (EU 015) as follows:

<i>Regulation</i>	<i>EU No(s).</i>
<i>Acid Rain Program)</i>	
<i>Rule 62-296.470, F.A.C. (Clean Air Interstate Rule) (CAIR)</i>	<i>015, 016</i>
<i>Rule 62-296, F.A.C. (Emission Limiting Standards)</i>	<i>015, 016</i>
<i>Rule 62-297, F.A.C. (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures)</i>	<i>015, 016</i>
<i>Permit No. 0310047-002-AC; 0310047-013-AC</i>	<i>015</i>
<i>Permit Nos. 0310047-015-AC; 0310047-018-AC; 0310047-019-AC</i>	<i>016</i>

4. Condition FW9: According to EPA’s web-site RMPs should be submitted to EPA electronically. See <http://www.epa.gov/osweroel/content/rmp/#submitting>. JEA requests the Department revise Condition FW9 as follows:

*a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650, to EPA via RMP*eSubmit or as otherwise directed by EPA as of the date of submission per 40 CFR § 68.150. Facilities submitting Confidential Business Information (CBI) and Trade Secrets cannot use RMP*eSubmit at this time. Such facilities should contact the RMP Reporting Center for submission options.*

5. Condition FW10: JEA notes that “Appendix JEPB” referenced in Condition FW10 is not included in the Draft Renewal and requests the Department update the JEPB rule reference in Condition FW10 as follows:

The facility is subject to the JOC, Title X, Chapter 360 [Environmental Regulation], Chapter 362, Part 1 [Air and Water Pollution], Chapter 376 [Odor Control], and City of Jacksonville Environmental Protection Board (JEPB) Rule 1 85-1 [Final Rules with Respect to Organization, Procedures, and Practice].

6. Condition A.1: The listed maximum allowable heat input rates (for distillate oil and natural gas) include a decimal point and a zero. The original construction permit (Permit No. 0310047-002-AC), which is cited as the authority for this condition, did not include the decimal and zero. JEA requests that the limits be revised to read “1623” and “1822”, deleting reference to “.0”.

<i>EU No.</i>	<i>MMBtu/hour</i>	<i>Fuel Type</i>
<i>015</i>	<i>1623.0</i>	<i>Natural Gas</i>
<i>015</i>	<i>1822.0</i>	<i>Distillate Oil</i>

7. Condition A.2: In Existing Permit, this condition (labeled B.2 in the Existing Permit) cross-references an additional section in the Existing Permit (B.21) that includes explanation regarding the affect of CT inlet conditions, etc., on maximum heat input:

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **B.21**. [Rule 62-297.310(2), F.A.C.]

In the Draft Renewal, Existing Permit Condition B.21 has apparently been removed. JEA requests that Existing Permit Condition B.21 be re-inserted into the Draft Renewal and that Draft Renewal Condition A.2 be revised

to reference this condition. JEA also requests Condition A.2 be revised to recognize that it does not apply to CO annual or permit renewal compliance testing conducted concurrently with NO_x RATA testing. JEA's requested revisions to Condition A.2 are as follows:

"See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. See Condition A.[insert condition number for re-inserted B.21]. This provision does not apply to CO annual or permit renewal compliance testing conducted concurrently with NO_x RATA."

8. Condition A.3: The original construction permit did not include the reference to "new." Also, the Existing Permit provides for No. 2 fuel oil "or better." JEA requests the Department revise Condition A.3.a.(2) as follows:

"(2) ~~New~~ No.2 fuel oil or better."

9. Conditions A.9; A.10: Conditions A.9 and A.10 indicate that EU 15 is subject to stack testing to demonstrate compliance with lb/hr emission limits. To ensure consistency with later conditions (including A.25.b.) JEA requests revision of Conditions A.9 and A.10 to clarify that compliance with applicable lbs/hour rates by stack test was only required initially and is not required on an annual or permit renewal basis:

For A.9: "In addition, NO_x emissions calculated as NO₂ shall exceed neither 15 ppmvd at 15% O₂ nor 318 lbs/hour ~~to be~~ as initially demonstrated by stack test. Subsequent annual or permit renewal compliance stack testing is not required."

For A.10: "In addition, NO_x emissions calculated as NO₂ shall exceed neither 42 ppmvd at 15% O₂ nor 99 lbs/hour ~~to be~~ as initially demonstrated by stack test. Subsequent annual or permit renewal compliance stack testing is not required."

10. Condition A.11: JEA requests clarification that neither annual nor permit renewal compliance stack testing are required for the lbs/hour emission limits in Condition A.11, and that testing was only required initially for such emission limit:

"CO emissions shall not exceed 48 lbs/hour (natural gas) and 97 lbs/hour (fuel oil) ~~to be~~ as initially demonstrated by stack test. Subsequent annual or permit renewal compliance stack testing is not required for lb/hour emission limits."

11. Condition A.12: JEA requests the Department revise Condition A.12 to clarify that no annual or permit renewal compliance testing is required for

VOC because compliance with the CO emission limit serves as a surrogate:

“ . . . and 19 lbs/hr (distillate oil). No annual or permit renewal compliance testing is required. Compliance with the CO emission limit serves as a surrogate.”

12. Condition A.14: JEA requests the Department revision Condition A.14 to include fuel switching consistent with Condition A.32 as follows:

Excess emissions resulting from startup, shutdown, ~~or~~ malfunction, and fuel switching of any emissions unit 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.]

13. Condition A.16: JEA requests that the Department update the referenced rule citation to “40 CFR 60.334(b)(2)”. JEA suggests the appropriate citation is now 40 CFR 60.334(h)(1).

14. Condition A.17: JEA requests that the Department update the referenced rule citation to “40 CFR 60.335(d) and (e)”. JEA suggests the appropriate citation is now 40 CFR 60.335(b)(11).

15. Condition A.18: JEA requests that the Department include a reference to 40 CFR 60.334 in the authorities cited at the end of Condition A.18 and requests that the Department revise Condition A.18 as follows:

At JEA’s election, ~~V~~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. [40 CFR 60.334 & 40 CFR 75 and Permit No. 0310047-002-AC]

16. Condition A.19: JEA requests that the Department include a reference to 40 CFR 60, subpart GG and, for clarity, requests that the Department revise Condition A.19 as follows:

Periods when NO_x emissions (ppmvd at 15% oxygen) are above the standards listed in this permit, taking into account the applicable averaging periods, shall be provided to the Department’s Bureau of Air Monitoring and the EQD pursuant to 40 CFR 75 and 40 CFR 60, subpart GG.

17. Condition A.20: JEA requests that the Department review and update the following referenced rule citation:

1) “40 CFR 60.334(c)(1)” (JEA suggests the current appropriate citation is now 40 CFR 60.334(b)); and

2) “40 CFR 60.335(c)(2)” (JEA suggests the current appropriate citation is now 40 CFR 60.334(b).

18. Condition A.21: Permit No. 0310047-002-AC indicates missing data shall be handled as required by Title IV (40 CFR 75). However, 40 CFR 60.334 of subpart GG indicates that for purposes of identifying excess emissions, the missing data methodology of 40 CFR 75 is not required and missing CEMS data should be reported as monitor downtime in the excess emissions and monitoring performance report. JEA requests the Department revise Condition A.21 as follows:

The NO_x and O₂ 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. As required by 40 CFR 60.334, for purposes of identifying excess emissions, the missing data methodology of 40 CFR 75 is not required and missing CEMS data should be reported as monitor downtime in the excess emissions and monitoring performance report required in 40 CFR 60.7(c). [40 CFR 60 & 40 CFR 75; and, Permit No. 0310047-002-AC]

19. Condition A.22: Pursuant to Condition A.25.d., no PM testing is required. Also, Condition B.16 for CT No. 8 allows for Method 7E and Method 19. JEA requests the Department revise Condition A.22 to delete reference to PM testing methods and similarly allow for Method 7E and Method 19 test methods as follows:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5 or 17	Method for Determining Particulate Matter Emissions (All PM is assumed to be PM10.)
<u>7E</u>	<u>Determination of Nitrogen Oxide Emissions from Stationary Sources (Instrumental)</u>
9	Visual Determination of the Opacity of Emissions from

	<i>Stationary Sources</i>
10	<i>Determination of Carbon Monoxide Emissions from Stationary Sources</i> <i>{Note: The method shall be based on a continuous sampling train.}</i>
19	<i>Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxide Emission Rates</i>
20	<i>Determination of Nitrogen Oxides, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines</i>
18, 25, or 25A	<i>Method for Determining Gaseous Organic Concentrations (Flame Ionization)</i>

20. Condition A.24: Condition A.24 appears to be redundant and should be deleted in its entirety in light of Condition A.25.e.

21. Condition A.25: JEA requests the Department revise the title of Condition A.25 as follows: “Annual Compliance Tests Required”.

22. Condition A.25.a.: JEA requests the Department revise Condition A.25.a. as follows:

a. CO Emissions. Annual compliance testing for CO may be conducted at less than capacity when compliance testing is conducted concurrent with the annual NOX RATA testing, which is performed pursuant to 40 CFR 75, and when so conducted, future operations are not limited to 110% of the test rate.

23. Condition A.25.b.: JEA requests the Department revise the permitting note in Condition A.25.b. as follows:

{Permitting Note: The permittee conducted initial tests in accordance with the lbs/hour emission standards in Specific Condition A.9 and A.10 and EPA Method 20 to demonstrate compliance with Subpart GG in 40 CFR 60.}

24. Condition A.25.e.: JEA requests the Department revise the first sentence in Condition A.25.e. as follows:

An annual ~~performance~~ compliance test is required to determine VE.

25. Condition A.25.c., d., and f.: JEA requests revision to the first sentence in Conditions A.25.c., d., and f. as follows:

c. No annual compliance testing is required.

d. No annual compliance testing is required.

f. No annual compliance testing is required.

26. Condition A.26: JEA requests revision to Condition A.26 to clarify that no other renewal tests are required, other than VE and CO (and that the most recent annual CO compliance test conducted at less than capacity per Condition A.25, satisfies the requirement to conduct a compliance test prior to renewal).

In addition to the annual compliance tests specified above, compliance tests shall also be performed for CO and VE prior to obtaining a renewed operation permit to demonstrate compliance with the emission limits in Specific Condition A.11. The most recent annual compliance test conducted pursuant to Specific Condition A.25.a. may satisfy the requirement to conduct compliance testing prior to renewal for CO. No compliance tests prior to renewal are required for VOC. The most recent annual compliance test conducted pursuant to Specific Condition A.25.e. may satisfy the requirement to conduct compliance testing prior to renewal for VE. No compliance tests prior to renewal are required for VOC. Compliance with the CO emission limit serves as a surrogate for VOC. No compliance tests prior to renewal are required for NOx. Continuous compliance with the NOx standards shall be demonstrated by the CEMS maintained in accordance with 40 CFR 75. [Rules 62-210.300(2)(a) & 62-297.310(7)(a), F.A.C.]

27. Condition A.32: JEA requests the Department revise the citation at the end of Condition A.32 as follows:

[40 CFR 60 & 40 CFR 75; and, Permit Nos. 0310047-002-AC s. 0310047-002-AC and 0310047-013-AC]

28. Condition A.33: Insert "Permit No." into the citation at the end of the paragraph.

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. [Permit No. 0310047-002-AC]

29. On page 12 or 29: For consistency and clarity, JEA requests the Department revise the CT No. 8 Model description as follows:

Emissions unit 016 is a combustion turbine (CT) manufactured by the General Electric Company (General Electric Model PG7241 7-FA) and is designated as CT No. 8.

30. Condition B.10: JEA requests that Condition B.10 be revised to add Method 7E and Method 20 to the compliance methods for NO_x for clarity and consistency with Condition B.16.

31. Condition B.10.b.:

“Compliance with the lb/hr NO_x standards is only required to be demonstrated with initial compliance tests or ~~Upon special request (B.21)~~ by the Department, ~~e.~~ Compliance with the applicable lb/hr NO_x limit can be demonstrated for any 3-hour averaging period by converting CEMS data rather than through regular stack testing.”

32. Condition B.18: For clarity and consistency, JEA requests the Department revise Condition B.18 as follows:

Testing Requirements. ~~Unless otherwise specified, All performance all compliance tests shall be conducted between 90% and 100% of permitted capacity in accordance with the requirements of Rule 62-297.310(2), F.A.C. The required does not apply to [Rules 62-297.310(7)(a) & (b), F.A.C.; 40 CFR 60.8; and, Permit No. 0310047-015-AC, Specific Condition 15]~~

33. Condition B.20: For consistency and clarity, JEA requests the Department revise Condition B.20 to provide that neither annual nor renewal compliance testing are required for NO_x, PM, or SO₂. Further it should be clarified that annual CO compliance tests are not required and that CO compliance test performed prior to permit renewal may be conducted concurrently with NO_x RATA testing at less than permitted capacity as provided for EU 15 in Draft Renewal Condition A.25.

During each federal fiscal year (October 1st to September 30th), annual compliance tests for visible emissions shall be conducted. For each visible emissions test, emissions of NO_x recorded by the CEMS shall also be reported. If the unit does not operate for more than 400 hours in a federal fiscal year for a given fuel, then an annual visible emissions test is not required for that fuel. If annual visible emissions testing is not required due to this exclusion, a visible emissions compliance test shall be conducted prior to obtaining a renewed Title V operating permit. Neither annual nor permit renewal compliance testing is required for NO_x. Continuous compliance with the NO_x standards shall be demonstrated by CEMS maintained in accordance with 40 CFR 75. Annual compliance tests are not required for CO. Compliance tests shall

be performed prior to renewal. CO compliance testing may be conducted concurrently with the annual NOx RATA testing and when so conducted, future operations are not limited to 110% of the test rate. [Rules 62-4.070(3), 62-297.310(7)(a) & (b), F.A.C.; and, Permit Nos. 0310047-015-AC, Specific Condition 18 & 0310047-019-AC]

34. Condition B.22: JEA requests the Department revise Condition B22 as follows:

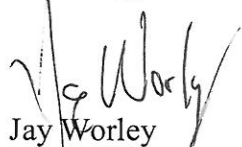
Report	Reporting Deadline	Related Condition(s)
<i>Monitoring of Capacity</i>	<i>Daily.</i>	<u>B.2324.</u>
<i>Monthly Operations Summary</i>	<i>Monthly.</i>	<u>B.2425.</u>
<i>Fuel Sulfur Records</i>	<i>Daily.</i>	<u>B.2526.</u>
<i>CEMS RATA Reports</i>	<i>As required.</i>	<u>B.2627.</u>
<i>Emissions Reports</i>	<i>As required.</i>	<u>B.2728.</u>

35. Condition B.27: JEA requests the Department revise Condition B27 as follows:

*At least 15 days prior to conducting any Relative Accuracy Test Audits Assessments(RATA) on a CEMS, the permittee shall provide written notification to the Compliance Authority of the schedule (by letter, email, or fax). A summary of the RATA reports shall be provided upon written request of the Compliance Authority and in the SIP Excess Emissions Report as specified in Specific Condition **B.2728.** [Rules 62-4.070(3) & 62-212.400(BACT), F.A.C.; and, Permit No. 0310047-015-AC, Specific Condition 28]*

Thank you for your attention to this matter. Please contact me at (904) 665-8729 if you have any questions or require any additional information.

Sincerely,



Jay Worley
Director, Environmental Programs