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OCT 01 1999

DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR REGULATION

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

OGC CASE NO.:
FDEP File No.: 0310485-001AC (PSD-FL-267)

JEA
Brandy Branch Facility
Duval County, Florida

REQUEST FOR ENLARGMENT OF TIME

By and through undersigned counsel, JEA (formerly known as the Jacksonville Electric Authority) hereby requests, pursuant to Florida Administrative Code Rule 62-110.106(4), an enlargement of time, to and including November 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, JEA states the following:

1. The Department of Environmental Protection (Department) issued an "Intent to Issue Air Construction Permit" (FDEP File No.: 0310485-001-AC (PSD-FL-267)) for the JEA Brandy Branch facility located in Duval County, Florida, dated August 11, 1999. Along with the Intent to Issue, the Department issued a Draft Air Construction Permit and "Public Notice of Intent to Issue Air Construction Permit." JEA previously requested an extension of time until October 1, 1999.
2. JEA received an unsigned version of this Intent to Issue by e-mail on August 12, 1999.

3. Based on JEA's review, the Draft Permit and associated documents contain several provisions that warrant clarification or correction.

4. This request is filed simply as a protective measure to avoid waiver of JEA's right to challenge certain conditions contained in the Draft Permit. Grant of this request will not prejudice either party, but will further their mutual interest and hopefully avoid the need to file a petition and proceed to a formal administrative hearing. If the Department denies this request, JEA requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

WHEREFORE, JEA respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Air Construction Permit for FDEP File No.: 0310485-001-AC (PSD-FL-267) be formally extended to and including November 1, 1999.

Respectfully submitted this 30 day of September, 1999

HOPPING GREEN SAMS & SMITH, P.A.

By: Robert A. Manning

Robert A. Manning
Florida Bar No. 0035173
Post Office Box 6526
Tallahassee, FL 32314
(850) 222-7500

ATTORNEYS FOR JEA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by

U.S. Mail on this _____ day of September, 1999:

Al Linero
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Scott Goorland, Esq.
Department of Environmental Protection
Room 669
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Clair Fancy
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attorney

INTEROFFICE MEMORANDUM

Date: 24-Sep-1999 12:12pm

From: Gianazza, N. Bert
GianNB@jea.com

Dept:

Tel No:

To: Mike Halpin (Halpin_M@dep.state.fl.us)
To: Mike Halpin2 (mphalpin@prodigy.net)

Subject: Comments on Brandy Branch

MIME-Version: 1.0

Content-type: text/plain; charset=ISO-8859-7

Hi Mike. Below are our comments on the BB permit.

(1) All citations to 40 CFR 52.21 should be deleted from the permit and statement of basis. 40 CFR 52.21 only applies to states that do not have their own PSD program. For states that have their own PSD program, 40 CFR 51.166 applies. Specifically, Conditions 6 and 7 continue to cite 52.21 as authority, inappropriately. Condition 6 should be deleted in its entirety because it is solely derived from 40 CFR 52.21; a comparable provision does not exist in 40 CFR 51.166 or state law. Condition 7 is not necessary because the Brandy Branch project is not a "phased construction project." If the Department believe this condition is necessary, it should be limited to an exact quote of 40 CFR 51.166(j)(4) the first and last sentences of this condition are unnecessary and inappropriate.

(2) JEA requests that the possibility of installing an evaporative inlet cooler (fogger) be referenced in the permit itself, and not only in the Technical Evaluation. ok

(3) Condition 8. JEA appreciates the Department's inclusion of a permitting note clarifying the purpose for including the heat input values. To be consistent with other recently issued Title V permits, JEA also requests that the Department include the entire permitting note reflected in the attached proposed permit. I will send or fax this language separately.

(4) Condition 19. For clarification, JEA requests that this condition read as follows: "Consistent with normal operation and maintenance practices, the DLN systems shall each be tuned" ok

(5) Condition 21. JEA appreciates the Department's concurrence of the need to require the submittal of an engineering report only after a CT burns oil at least 400 hours. However, JEA does not believe the revised permit language accomplishes this result. Accordingly, JEA requests that the first sentence of the fourth bullet read as follows: "After combusting fuel oil for at least 400 hours on any individual CT, the permittee shall prepare" This language would require JEA to submit the report whenever a CT burned at least 400 hours, whether this occurred more or less than 18 months after the initial compliance test. Also, the first bullet in Condition 21 is not appropriate because the missing data procedures under 40 CFR Part 75 are designed to assure compliance with an annual limit, not a short term limit. Accordingly, JEA requests that this bullet be deleted. ok

(6) Condition 22. In accordance with our vendor guarantee and the permit application, please revise the CO limit on gas from 12 ppm to 15 ppm. Also, both the oil and gas guarantees are for full load only, therefore we request that clarifying language be added that states that the limit and stack testing requirements are for full load conditions only. (Note: Since automobiles account for about 90% of the CO emissions inventory in Duval, and the entire JEA system accounts for only about 2% of the CO emissions inventory for Duval, the CO emissions from these units will have no significant effect on ambient air quality.)

OK

(7) Condition 24. BACT for particulate matter was determined to be good combustion practices and an opacity limit of 10 percent. It is not necessary or appropriate to include a PM limit in a condition regarding visible emissions, especially where the BACT does not impose a PM limit. Also, JEA does not object to the removal of the language regarding a 20 percent opacity limit during startup and shutdown, but notes that Condition 26 allows excess emissions for a period of 2 hours in any 24 hour period resulting from startup, shutdown and malfunction.

NO

(8) Condition 43. JEA appreciates the Department's agreement to make this condition consistent with other permitting actions, but does not believe the language is consistent with 40 CFR 75.62. Accordingly, JEA requests that the last sentence of this condition read as follows: "Data on CEM equipment specifications . . . be provided to the Department's Northeast District Office as well as RESD no later than 45 days prior to the first scheduled certification test pursuant to 40 CFR 75.62." The existing permit language, inappropriately, requires the submittal of this data 90 days prior to the certification test.

OK

(9) While our initial aggressive schedule for the installation of these units called for having all three in commercial operation in the year 2001, it is possible that circumstances will result in the last of the three units not being released for commercial operation until sometime in the year 2002. For this reason, we request a permit expiration date of 12/31/02.

OK

If you have any questions with regard to the above comments or would like to talk to me about any of these issues, please do not hesitate to call me.

Tx, Bert

101 677 NRC
10/19/98

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



September 10, 1999

RECEIVED 9027577B

SEP 13 1999

BUREAU OF AIR REGULATION

Bureau of Air Quality Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attention: Mr. Cleve Holladay

RE: REFINED REGIONAL HAZE ANALYSES FOR THE PROPOSED JEA BRANDY
BRANCH FACILITY - DRAFT

Dear Cleve:

Please find enclosed two report copies of the refined regional haze analysis for Jacksonville Electric Authority's proposed Brandy Branch facility. Included with the report is a CD containing all data files and modeling input and output files used in the analysis. Should you have any questions or comments about the report or files, please contact me. Thank you.

Sincerely,

GOLDER ASSOCIATES INC.

A handwritten signature in black ink, appearing to read "Steven R. Marks", written in a cursive style.

Steven R. Marks, CCM
Senior Scientist

SRM/jkk

Enclosures

cc: B. Giannazza, JEA
M. Baretta, B&V
E. Porter, USFWS
S. Krivo, EPA Region IV

\\GATORBAIT\DP\Projects\99\937577b\RI\#031tr.dot



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 10 1999

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SEP 17 1999

4 APT-ARB

Mr. A. A. Linero, P.E.
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

SUBJ: Preliminary Determination and Draft Permit for Jacksonville Electric Authority - Brandy Branch Project (PSD-FL-267) located in Duval County, Florida

Dear Mr. Linero:

Thank you for sending the preliminary determination and draft permit dated August 11, 1999, for the above referenced facility. The preliminary determination is for the proposed construction and operation of a new electric power generating station consisting of three simple cycle combustion turbines (CTs) with a nominal generating capacity of 170 MW each. The combustion turbines proposed for the facility are General Electric (GE), frame 7FA units. Additional equipment will include the following: three 1 million gallon fuel oil storage tanks and one small diesel fire-water pump. The CTs will primarily combust pipeline quality natural gas with No. 2 fuel oil combusted as backup fuel. The fire-water pump will combust only diesel fuel. Each CT will be allowed to fire natural gas a maximum of 4,000 hours per year and will be allowed to fire No. 2 fuel oil a maximum of 750 hours per year. Total emissions from the proposed project are above the thresholds requiring Prevention of Significant Deterioration (PSD) review for nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (PM/PM₁₀) and sulfuric acid mist (SAM).

Based on our review of the preliminary determination and draft permit, we have the following comments:

1. The NO_x BACT emission limit, when burning natural gas in the combustion turbines, is 10.5 ppmvd (15% oxygen). Region 4 has recently reviewed several GE 7FA dual-fuel simple cycle combustion turbine projects with a proposed BACT emissions limit of 9 ppmvd for NO_x, three of which are located in Florida (Oleander, Hardee Power, FPC-Intercession City). If the Brandy Branch facility is significantly different from these other facilities, documentation of this difference should be included in the department's final determination.
2. In condition 21 of the draft permit, the emission rate for NO_x is set as 69.3 lb/hr on a 24-hr block average as measured by CEMS. Since the proposed CTs will run in simple cycle mode and will seldom operate for 24 consecutive hours, the averaging period for this emission limit

should be much shorter, consistent with the 3-hour averaging period proposed for fuel oil combustion. Additionally, compliance with the 10.5 ppmvd limit should be demonstrated using the CEMS on the basis of a short-term average instead of with an annual stack test as stated in the draft permit. Including a short-term limit on a lb/hr basis and on a ppmvd basis will provide an emissions cap and a compliance value for any operating load.

3. Conditions 14 and 15 express the fuel usage limits in Btu/yr during any consecutive 12 months. It is unclear if this limit refers to the total Btu/yr for all turbines or for each individual turbine. The fuel usage limits should be expressed on a per combustion turbine basis. Additionally, it is unclear if the "4,000 hours during any calendar year" in Condition 13 refers to each unit or all three total. This condition should be reworded to indicate that it applies to individual turbines, and the phrase "calendar year" should be replaced with "consecutive 12 months" to be consistent with Conditions 14 and 15.
4. The cost analysis for SCR uses NO_x emissions of 12 ppm as the baseline and calculates the cost effectiveness of using SCR with controlled NO_x emissions at an assumed level of 5 ppm. In other words, the applicant does not base tons per year reduced on a specific control efficiency value. We note that the applicant's approach yields a control efficiency of about 59 percent, which is at the low end of the control efficiencies we have previously seen for SCR control.
5. In table 4-3 of the SCR cost analysis (page 4-9 of the application), the Direct Annual Costs list both a "Power Consumption" and a "Lost Power Generation" figure in the cost calculation. Although it is appropriate to calculate the cost of using additional natural gas to compensate for the power consumption resulting from pressure drops across the catalyst bed, lost revenue should not be included in the cost analysis. It is unclear in this calculation whether lost revenue was taken into account. If this is the case, the lost revenue figure should be omitted from the cost analysis.
6. In the economic analysis section of the application, an interest rate of 8% was used to calculate the cost recovery factor. This interest rate may be appropriate for the Brandy Branch Facility; however, it should be noted that the current version of the U.S. Environmental Protection Agency's (EPA's) *OAQPS Control Cost Manual* uses an interest rate of 7 percent.
7. The proposed BACT limit, found on page 8 of the draft permit, for particulate matter (PM₁₀) is 10% opacity for visible emissions. This visible emissions opacity limit is proposed as a surrogate for a BACT particulate matter emissions rate limit. It is acceptable to use the 10% opacity limit as a surrogate for monitoring and recordkeeping; however, the permit conditions also should list the corresponding emission rate for particulate matter.
8. As indicated in condition 24 and 26 of the draft permit, FDEP is proposing to allow excess emissions due to startup, shutdown or malfunction for up to 2 hours in any 24-hour period and for a 20% opacity limit of visible emissions. This proposal is inconsistent with FDEP's

preliminary determination for Kissimmee Utility's Cane Island Power Park (January 1999) which only allowed excess emissions from a simple cycle combustion turbine for 1 hour in any 24-hour period. Additionally, it is EPA's policy that BACT applies during all normal operations and that automatic exemptions should not be granted for excess emissions. Startup and shutdown of process equipment are part of the normal operation of a source and should be accounted for in the planning, design, and implementation of operating procedures for the process and control equipment. Accordingly, it is reasonable to expect that careful and prudent planning and design will eliminate violations of emission limitations during such periods.

9. In section 5.4 (Visibility/Region Haze Analysis) of the permit application, CALPUFF modeling with ISCST3 meteorological data (CALPUFF Lite) was used to address regional haze impacts from this facility. This additional modeling was provided to the U.S. Fish and Wildlife Service (FWS) - administrator for both the Okefenokee and Wolf Island Class I areas. The modeling showed regional haze at Okefenokee significantly impacted by the project. Based on these results, JEA has agreed to shut down their Southside facility to provide air quality offsets. As requested by the FWS, CALPUFF modeling of the Southside and Brandy Branch emissions are needed to demonstrate that the proposed Brandy Branch project will not cause any additional visibility impairment at Okefenokee.

Thank you for the opportunity to comment on the Brandy Branch facility preliminary determination and draft permit. If you have any questions regarding these comments, please direct them to either Katy Forney at 404-562-9130 or Jim Little at 404-562-9118.

Sincerely,



R. Douglas Neeley

Chief

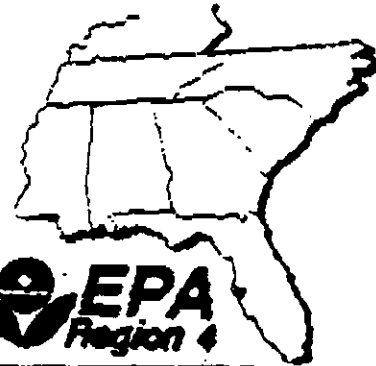
Air and Radiation Technology Branch

Air, Pesticides and Toxics

Management Division

cc: NPS
 NED
 Dural Co.
 Halpin, BAR
 Holladay, BAR

Copy: File in ~~XXXX~~ JEA Brandy Branch
Mike
Teresa
Jeff



facsimile TRANSMITTAL

FAX: Bert Giunazza of JEA
Jamie Hunter of TECO

Mississippi, Tennessee, Alabama, Georgia, Florida, Kentucky, South Carolina, North Carolina

To: AL Linero

Fax #: 850-922-6979

Subject: Brandy Branch

From: Kathy Frazier / Jim Little Phone#: 404-562-9130

Date: 9-10-99

Pages: 4, including this cover sheet.

COMMENTS:

Note to all recipients -

This gives you a pretty good idea of how EPA views some of our most recent conditions on simple cycle projects. Be ready for similar comments on all of the rest.

AL Linero



Air & Radiation Technology Branch
U.S. Environmental Protection Agency
61 Forsyth Street, SW, 12th Floor
Atlanta, Georgia 30303

404-562-9105
Fax 404-562-9095



Florida
Department of
Environmental Protection

Jeb Bush
Governor

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

David Struhs
Secretary

F A X T R A N S M I T T A L S H E E T

DATE: 9-13-99

TO: ~~David Struhs~~ But Gianazza

PHONE: _____

FAX: _____

FROM: Al Linero

PHONE: _____

Division of Air Resources Management

FAX: **850.922.6979**

RE: _____

CC: _____

Total number of pages including cover sheet: 4

Message

This gives you a pretty good idea
of how EPA views some of our most
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Be ready for similar comments on all
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Al Linero

If there are any problems with this fax transmittal, please call the above phone number.

"Protect, Conserve, and Manage Florida's Environmental and Natural Resources"

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 10 1999

4 APT-ARB

Mr. A. A. Linero, P.E.
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: Preliminary Determination and Draft Permit for Jacksonville Electric Authority - Brandy Branch Project (PSD-FL-267) located in Duval County, Florida

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3

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Thank you for the opportunity to comment on the Brandy Branch facility preliminary determination and draft permit. If you have any questions regarding these comments, please direct them to either Katy Forney at 404-562-9130 or Jim Little at 404-562-9118.

Sincerely,



R. Douglas Neeley

Chief

Air and Radiation Technology Branch

Air, Pesticides and Toxics

Management Division

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AUG 30 1999

BUREAU OF AIR REGULATION

FLORIDA PUBLISHING COMPANY

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared

Steven L. Smith who on oath says that he is

Legal Advertising Representative of The Florida Times-Union,

a daily newspaper published at Jacksonville in Duval County, Florida; that the attached copy of advertisement, being a Legal Advertisement

in the matter of Public Notice of Intent to Issue Air Construction Permit

in the Court,

was published in THE FLORIDA TIMES-UNION in the issues of August 23, 1999

Affiant further says that the said The Florida Times-Union is a newspaper published at Jacksonville, in said Duval County, Florida, and that the said newspaper has heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me this 25th day of August, A.D. 1999. Notary Public, State of Florida at Large.

Signature of Steven L. Smith

Vera Jennie Likens, Commission # OC 547806, Expires Jun. 1, 2000, Bonded Thru Atlantic Bonding Co., Inc.

DA 444

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 0310485-001-AC (PSD, FL-247)
JEA Brandy Branch Facility Units 1-3
Duval County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit under the requirements for the Prevention of Significant Deterioration (PSD) of Air Quality to JEA. The permit is to construct three nominal 170 megawatt (MW) natural gas and distillate fuel oil-fired combustion turbine-electrical generators with 90-foot stacks and three 1 million gallon fuel storage tanks for the proposed Brandy Branch Facility near Baldwin City, Duval County. A Best Available Control Technology (BACT) determination was required for sulfur dioxide (SO2), particulate matter (PM10), nitrogen oxides (NOx), sulfuric acid mist (SAM), and carbon monoxide (CO) pursuant to Rule 62.212.000, F.A.C. The applicant's name and address are JEA, 21 West Church Street, Jacksonville, Florida 32202.

The new units will be General Electric nominal 170 MW PG7241EA combustion turbine-electrical generators. The units will operate in simple cycle mode and intermittent duty. The units will operate primarily on natural gas and will be permitted to operate no more than 4750 hours per year of which no more than 750 hours per year and 16 hours per day will be using 0.05 percent sulfur distillate fuel oil. All units must achieve the manufacturer's initial "new and clean" performance guarantee of 9 parts per million by volume of 15 percent oxygen (ppm) and meet a continuous emission limit based on 10.5 ppm. NOx will be controlled to 42 ppm by wet injection when firing fuel oil. Sulfuric acid mist (SAM) and PM10 will be limited by use of clean fuels. Emissions of VOC and CO will be controlled by good combustion practices.

The maximum emissions in per tons per year based on the original application are summarized below. All emissions will be somewhat lower as a result of the Department's proposed BACT determination.

Table with 3 columns: Pollutant, Maximum Potential Emissions, PSD Significant Emission Rate. Rows include PM10, CO, NOx, VOC, SO2, Sulfuric Acid Mist.

An air quality impact analysis was conducted. Maximum predicted impacts due to proposed emissions from the project are less than the applicable PSD Class II significant impact levels. PSD Class I significant impact levels are exceeded for sulfur dioxide, therefore a Class I PSD increment analysis for SO2 was conducted. Based on the required analyses, the Department has reasonable assurance that the proposed project will not cause or significantly contribute to a violation of any AAQS or PSD increment.

Concurrent with the startup of the new facility, JEA will shutdown the Southside facility located at 801 Colorado Avenue in Jacksonville, Florida. The Southside emissions along with the net effect of these actions is shown below:

Table with 3 columns: Pollutant, Southside Emissions, Net Emissions. Rows include PM10, CO, NOx, VOC, SO2.

The Department will accept written comments and requests for a public hearing (meeting) concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "Public Notice of Intent to Issue PSD Permit." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the FINAL Permit, in accordance with the conditions of the DRAFT Permit, unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. The Department will accept written comments concerning the proposed DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #505, Tallahassee, Florida, 32399-2400. Any written comments filed shall be made available for public inspection. If comments received result in a significant change in this DRAFT Permit, the Department shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The Department will issue FINAL Permit with the conditions of the DRAFT Permit subject to the exceptions noted above unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. The procedures for petitioning for a hearing are set forth below. Mediation is not available for the proposed action.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 850/488-9370, fax: 850/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28.5-207 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact, if there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged as well as the rules and statutes which entitle the petitioner to relief; and (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28.106.301. Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection, Bureau of Air Regulation, 1111 S. Magnolia Drive, Suite 4, Tallahassee, Florida 32301. Telephone: 850/488-0114, Fax: 850/922-6977. Department Environmental Protection, Northeast District Office, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590. Telephone: 904/448-4300, Fax: 904/448-4366. Jacksonville Regulatory and Environmental Services Department, Suite 225, 117 W Duval Street, Jacksonville, Florida 32202. Telephone: 904/630-3484, Fax: 904/630-6338.

The complete project file includes the application, technical evaluation, Draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850-488-0114, for additional information.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1875 Century Boulevard
Atlanta, Georgia 30345

August 30, 1999

IN REPLY REFER TO:

Re: PSD-FL-267

Mr. C. H. Fancy
Chief, Bureau of Air Regulation
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road, MS 48
Tallahassee, Florida 32399-2400

RECEIVED

SEP 07 1999

BUREAU OF AIR REGULATION

Dear Mr. Fancy:

Our Air Quality Branch has reviewed the visibility analysis and additional information submitted by Jacksonville Electric Authority (JEA) pertaining to its Brandy Branch project in Baldwin, Florida. As you know, in our August 3, 1999, technical review document, we expressed concern that the Brandy Branch project would significantly affect visibility in Okefenokee Wilderness, a Class I air quality area, administered by the Fish and Wildlife Service. We encouraged JEA to shut down their Southside Generating Facility, thereby offsetting potential impacts from the proposed Brandy Branch project.

We are pleased that JEA has selected this option and agree that it will result in a net benefit to air quality and visibility in Okefenokee. The technical review comments from our Air Quality Branch are enclosed.

The technical review document also summarizes our concerns regarding predicted exceedances of the Class I sulfur dioxide increments in Okefenokee. We recommend that your Department determine the causes of those exceedances and take actions to remedy them.

Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our Class I air quality areas. If you have questions, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at (303) 969-2617.

Sincerely yours,

for Sam D. Hamilton
Regional Director

Enclosure

cc: NED
Dural Co
EPA
M. Halpin, BAR

**Technical Review of Visibility Analysis and Additional Information
for Jacksonville Electric Authority's Brandy Branch Generating Station
Baldwin, Florida**

by
Air Quality Branch, Fish and Wildlife Service – Denver
August 11, 1999

PSD-FL-267

We have reviewed the visibility analysis and additional information supplied to us regarding Jacksonville Electric Authority (JEA)'s proposed Brandy Branch Project, 34 km southeast of Okefenokee Wilderness. Our August 3, 1999, technical review document summarized our concerns for potential impacts from this project to air quality related values, specifically visibility, in Okefenokee. At that time, we noted that JEA should consider several options to mitigate potential visibility impacts, including shutting down their Southside Generating Station and using the subsequent emissions decrease to offset the new emissions expected at the Brandy Branch Station. We supported this option, as it would result in a high-emitting, poorly controlled, and inefficient facility (fueled by oil) being replaced by a lower-emitting, rigorously controlled, and more efficient facility (fueled primarily by natural gas, with oil as back-up).

We understand that JEA has selected this option and will accept as a permit condition for Brandy Branch the shutdown of Southside. We also understand that the Florida Department of Environmental Protection (FDEP) supports this alternative. In addition, JEA has demonstrated that this option will result in a net benefit to air quality and visibility at Okefenokee. JEA performed a CALPUFF-Lite modeling analysis that predicted that the Southside Station causes an 84% change in light extinction (a measure of visibility impairment) at Okefenokee; the proposed Brandy Branch facility would cause a 5% change in light extinction while burning natural gas, and a 20% change in light extinction while burning oil. Shutting down Southside will therefore result in a net benefit to visibility, while allowing electrical generation to continue.

We have also reviewed the Class I increment analysis for the proposed project. The ISCST3 analysis predicted that Brandy Branch emissions would contribute significantly to consumption of the 3-hour and 24-hour sulfur dioxide (SO₂) Class I increments. As required by FDEP, JEA then performed a cumulative analysis, modeling all increment-consuming sources in the area. The cumulative analysis predicted exceedances of both the 3-hour and 24-hour SO₂ Class I increments. Brandy Branch, however, did not contribute significantly to increment consumption on the days of the exceedances. We recommend that FDEP determine which sources are contributing significantly to the exceedances and take actions to remedy the exceedances.

Contact: Ellen Porter, Air Quality Branch (303) 969-2617.

INTEROFFICE MEMORANDUM

Date: 27-Aug-1999 02:34pm

From: Gianazza, N. Bert
GianNB@jea.com

Dept:

Tel No:

To: 'Mike Halpin' (Halpin_M@dep.state.fl.us)
CC: 'Alvaro Linero TAL 850/921-9532' (Alvaro.Linero@dep.state.fl.us)
CC: 'Clair Fancy' (clair.fancy@dep.state.fl.us)
CC: 'Bareta, Mark J.' (BaretaMJ@bv.com)
CC: 'ROBERT A MANNING' (ROBERTM@HGSS.COM)

Subject: Comments on Draft Brandy Branch PSD permit

Mike, below please find our comments on the Brandy Branch draft permit. I avoided using over-strikes since they seem to cause a problem for my email. I can clarify any comments by phone.

I need to resolve these issues before the expiration of the 30-day comment period (9/20) so we can get the permit by 10/1. Engineering allowed a whole week of float in their very aggressive construction schedule (in order to meet anticipated peak demand) and I don't want to be the one to use it up.

Since we didn't have any comments on the last three permitting exercises we went through this year, I don't expect outside comments to be submitted on this project either.

Even if you don't agree with our position on some of the below comments, I'm sure we can reach a mutually satisfactory agreement that gets you what you need with the least impact necessary on operations.

If you would like to talk to me and I'm not in my office, please use my beeper number (904-818-6247). As long as I'm in town I'll call you right away. Perhaps we can resolve most of the issues prior to our meeting on 9/15.

Thanks, Bert

Technical Evaluation and Preliminary Determination

1. Page TE-3. The Project Description lists VOCs as a pollutant for which a significant emission increase occurs and therefore requires a BACT determination. This is incorrect because of the VOC emission limits requested by JEA, and imposed pursuant to this permit. The BACT itself, on page BD-10, confirms this fact. The Project Description should be revised accordingly.

2. Page TE-3. The Project Description discusses the "maximum heat input rating" in terms of the higher heating value (HHV) of the fuel, whereas Specific Condition 8 references the capacity of the unit in terms of the lower heating value (LHV) of the fuel. The Project Description should be revised accordingly to reference heat input in terms of the LHV.

3. Page TE-4. The Project Description's discussion of the limit on hours of operation should be revised. We request 4750 hours per unit per year of which 750 per unit can be on oil. All modeling was performed using 4800 hours of operation of which 800 hours was on oil with no significant visibility or PSD impacts. This does not include the improvements in environmental impacts as a result of decommissioning Southside Generating Station. Specific Condition 13 should be revised accordingly.

4. Page TE-5. The discussion of the Process Description states that an evaporative inlet cooler (fogger) "can" be installed. JEA requests that this possibility be reflected in the permit itself.

5. Page TE-6. The Rule Applicability analysis incorrectly references 40 CFR 52.21 and 40 CFR 52. These provisions only apply to states that do not have an approved PSD program, which Florida does. 40 CFR 51.166 lists the requirements for a state to obtain an approved program.

6. Page TE-7. The Control Technology section references VOCs as a pollutant for which the PSD regulations are applicable in the context of the Brandy Branch project. As explained above, this reference is incorrect and should be deleted.

Air Construction Permit

7. Page 4 of 14. Conditions 6 and 7. These conditions should be deleted because, as explained above, 40 CFR 52.21 is not applicable to facilities in Florida, and further, the 18 month limitation on commencing construction and the provisions on phased construction projects are not contained in Florida's approved PSD program. Thus, there is no basis for requiring this type of continual review; if air permitting requirements are triggered in the future, they should be applied at that time.

8. Page 6 of 14. Condition 7. For clarification in the first sentence, JEA requests that parentheses be placed around the words "No. 2 or superior grade of distillate fuel oil."

9. Page 7 of 14. Condition 8. In accordance with the Department's position on recently issued Title V permits, JEA requests that a permitting note be placed at the end of Condition 8 to clarify that the heat input values are included only for purposes of determining capacity during testing, and that regular record keeping is not required.

10. Page 7 of 14. Condition 13. For clarification, the first word of this Condition should be changed from "The" to "Each." Also, the hours should be revised to reflect the correct numbers. We request 4750 in accordance with the no significant impact analyses performed.

11. Page 7 of 14. Conditions 14 and 15. These conditions should be deleted because (a) the permit already imposes sufficient limitations on capacity through the hourly limitation (Condition 13) and the maximum heat input rate for purposes of determining capacity during testing (Condition 8), and (b) other recently issued PSD permits in Florida do not contain this type of redundant limitation.

12. Page 8 of 14. Condition 17. This Condition should be deleted. There is no reason to believe that JEA will be unable to meet its permit limits. If this were to occur at some point in the future, however, then appropriate actions could be taken at that time.

13. Page 8 of 14. Condition 20. To accurately reflect the purpose and basis for the chart at the bottom of page 8 (i.e., a BACT analysis was not required for VOC), the first sentence should be revised as follows: "The following table is a summary of the emission limits for the combustion turbines and is followed by the applicable specific conditions."

14. Page 9 of 14. Condition 21, fourth bullet. This Condition unnecessarily extends the determination of BACT when firing oil and should be deleted. Alternatively, instead of requiring a report within 18 months of the initial compliance test, it would be more appropriate to require such a test after a certain number of hours of operating on oil. These units may not burn oil, regularly or even at all, and would therefore be unable to evaluate a NOx rate that can "consistently be achieved" until such time as they operate a certain number of hours on oil. Accordingly, if this Condition is not deleted, JEA requests that the beginning of the first sentence be revised as follows: "Whithin 18 months after the initial compliance test and after burning at least 400 hours on oil, the permittee shall prepare"

15. Page 9 of 14. Condition 22. The last sentence should clarify that the test method for determining compliance with the lb/hr emissions is EPA Method 10.

16. Page 9 of 14. Condition 25. The last sentence should clarify that the test method for determining compliance with the lb/hr emissions is EPA Method 18 and/or 25A.

17. Page 10 of 14. Condition 26. The last sentence appears to have a typographical error. Please add the word "caused" after the words "Excess emissions."

18. Page 10 of 14. Condition 27. To accurately reflect the regulatory requirement under Rule 62-210.700(6), Fla. Admin. Code, the following revision should be made to the first sentence: "If excess emissions occur due to malfunction, the owner or operator" Also, this Condition should only require JEA to notify RESD, and not also DEP, because RESD is the compliance authority. Other conditions in this permit require similar duplicate reporting and should be revised accordingly.

19. Page 10 of 14. Condition 29. To clarify our understanding that initial testing when burning oil is not required until the unit actually begins firing oil, as well as other changes, JEA requests the following revisions: "Initial (I) performance tests shall be performed on each unit while firing natural gas as well as while firing fuel oil, in accordance with Condition 28. Initial tests shall also be conducted after any modifications (and shake down period not to exceed 100 days after re-starting the CT) to air pollution control equipment, including low NOx burners."

20. Page 11 of 14. Condition 30. The references to SCR controls is unnecessary and inappropriate and should therefore be deleted. Also, JEA requests a revision to accurately reflect the regulatory provisions regarding the calculation of emission rates, as follows: "Continuous compliance with the NOx emission limits shall be demonstrated with the CEM system based on the applicable averaging time of 24-hour block average (while burning gas) or a 3-hr average (while burning oil). For the 24-hr block average (lb/hr) emission may be determined via EPA Method 19 or equivalent EPA approved methods. Based on CEMS data, a separate compliance determination is conducted at the end of each operating day (or a 3-hr period where applicable) and a new average emission rate is calculated from

the arithmetic average of all valid hourly emission rates from the previous operating day (or 3-hr. period where applicable). Valid hourly emission rates"

21. Page 11 of 14. Condition 31. For clarification and to be consistent with recently issued PSD permits, JEA requests the following revisions: " . . . for sulfur content of gaseous fuel shall be utilized in accordance with the EPA-approved custom fuel monitoring schedule or natural gas supplier data or the natural gas sulfur content referenced in 40 CFR 75 Appendix D. . ."

22. Page 11 of 14. Condition 33. The reference to BACT should be deleted because VOCs were not subject to a BACT determination for this facility.

23. Page 12 of 14. Condition 40. This Condition should be revised, in accordance with the comments regarding Conditions 14 and 15 above. Specifically, paragraphs (1) and (2) should be deleted in their entirety, and the words "as heat input" should be deleted from paragraphs (3) and (5).

24. Page 13 of 14. Condition 41. The last sentence is redundant to other permit conditions and therefore should be deleted. At a minimum, the words "and fuel switching" should be deleted because this is not required by regulation.

25. Page 13 of 14. Condition 43. For clarification and to be consistent with other recently issued PSD permits, the last sentence should be revised as follows: "Data on CEM equipment specifications, manufacturer, type, calibration and maintenance needs, and its proposed location shall be provided to the Department's Northeast District Office as well as RESD for review. no later than 45 days prior to the first scheduled certification test pursuant to 40 CFR 75.62."

26. Page 13 of 14. Condition 45, first bullet. For clarification, this Condition should be revised as follows: "The permittee shall apply for an Acid Rain permit in compliance with the deadlines specified in 40 CFR 72.30."

RFC-822-headers:

Received: from epic5.dep.state.fl.us ([199.73.143.30])

by mail.epic1.dep.state.fl.us (PMDF V5.2-32 #37976)

with ESMTP id <01JF9KCUY7JG000FIB@mail.epic1.dep.state.fl.us>; Fri,
27 Aug 1999 14:32:26 EDT

Received: from es2.jea.com ([161.243.208.42]) by mail.epic5.dep.state.fl.us
(PMDF V5.2-32 #31508)

with ESMTP id <01JF9KFLPL1M0003FS@mail.epic5.dep.state.fl.us>; Fri,
27 Aug 1999 14:34:40 -0400 (EDT)

Received: by es2.jea.com with Internet Mail Service (5.5.2448.0)
id <PFGRPF09>; Fri, 27 Aug 1999 14:34:23 -0400

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THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED

AUG 27 1999

BUREAU OF AIR REGULATION

In the Matter of an
Application for Permit by:

OGC CASE NO.:
FDEP File No.: 0310485-001AC (PSD-FL-267)

JEA
Brandy Branch Facility
Duval County, Florida

REQUEST FOR ENLARGMENT OF TIME

By and through undersigned counsel, JEA (formerly known as the Jacksonville Electric Authority) hereby requests, pursuant to Florida Administrative Code Rule 62-110.106(4), an enlargement of time, to and including October 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, JEA states the following:

1. The Department of Environmental Protection (Department) issued an "Intent to Issue Air Construction Permit" (FDEP File No.: 0310485-001-AC (PSD-FL-267)) for the JEA Brandy Branch facility located in Duval County, Florida, dated August 11, 1999. Along with the Intent to Issue, the Department issued a Draft Air Construction Permit and "Public Notice of Intent to Issue Air Construction Permit."
2. JEA received an unsigned version of this Intent to Issue by e-mail on August 12, 1999.
3. Based on JEA's review, the Draft Permit and associated documents contain several provisions that warrant clarification or correction.

4. This request is filed simply as a protective measure to avoid waiver of JEA's right to challenge certain conditions contained in the Draft Permit. Grant of this request will not prejudice either party, but will further their mutual interest and hopefully avoid the need to file a petition and proceed to a formal administrative hearing. If the Department denies this request, JEA requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

WHEREFORE, JEA respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Air Construction Permit for FDEP File No.: 0310485-001-AC (PSD-FL-267) be formally extended to and including October 1, 1999.

Respectfully submitted this 26 day of August, 1999

HOPPING GREEN SAMS & SMITH, P.A.

By: Robert A. Manning

Robert A. Manning
Florida Bar No. 0035173
Post Office Box 6526
Tallahassee, FL 32314
(850) 222-7500

ATTORNEYS FOR JEA

CERTIFICATE OF SERVICE

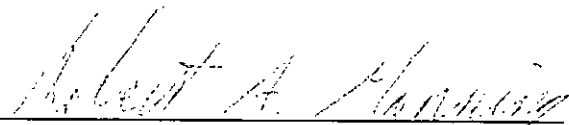
I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by

U.S. Mail on this 26 day of August, 1999:

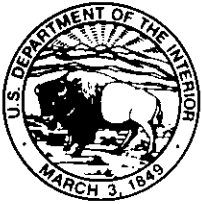
Al Linero
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Scott Goorland, Esq.
Department of Environmental Protection
Room 669
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Clair Fancy
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400



Attorney



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

1875 Century Boulevard
Atlanta, Georgia 30345

August 12, 1999

RECEIVED

AUG 17 1999

BUREAU OF AIR REGULATION

Re: PSD-FL-267

Mr. C. H. Fancy
Chief, Bureau of Air Regulation
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road, MS 48
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

Our Air Quality Branch has reviewed the additional information submitted by Jacksonville Electric Authority (JEA) pertaining to its Brandy Branch project in Baldwin, Florida. The project is located 34 km southeast of Okefenokee Wilderness and 127 km southwest of Wolf Island Wilderness, both Class I air quality areas, administered by the U.S. Fish and Wildlife Service (FWS). The technical review comments from our Air Quality Branch are enclosed. In summary, JEA's regional haze analysis predicts that the project will significantly contribute to visibility impairment in Okefenokee. Based on this information, FWS would object to the issuance of a permit for the project. The technical review document summarizes the options available to JEA, including choosing not to proceed with the project, reducing the project's emissions, offsetting the project's emissions with the shutdown of JEA's Southside Station, and conducting a more refined modeling analysis. In any case, JEA must demonstrate that the Brandy Branch project will not further reduce visibility in the Okefenokee Class I area.


Thank you for the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our Class I air quality areas. If you have any questions, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at (303)969-2617.

cc: M. Halpin, BAR
Dural Co.
NEP
EPA
C. Hellday, BAR

Enclosure

B. Gianazza, JEA
A. Compaan, B&V

Sincerely yours,


for Sam D. Hamilton
Regional Director

**Technical Review of Additional Information
for Jacksonville Electric Authority's Brandy Branch Generating Station
Baldwin, Florida**

by
Air Quality Branch, Fish and Wildlife Service – Denver
August 3, 1999

PSD-FL-267

Jacksonville Electric Authority (JEA) is proposing to install three 170 MW simple cycle combustion turbines at their Brandy Branch Facility. The turbines will fire natural gas as the primary fuel, with low sulfur (less than 0.05 %) fuel oil as a back-up fuel. The Brandy Branch Facility is located 34 km southeast of Okefenokee Wilderness and 127 km southwest of Wolf Island Wilderness, both Class I air quality areas administered by the U.S. Fish and Wildlife Service (FWS). The project will result in PSD-significant increases in emissions of nitrogen oxides (NO_x), sulfur dioxide (SO₂), particulate matter (PM), fine particulate matter less than 10 microns in diameter (PM-10), carbon monoxide (CO), and sulfuric acid mist (SAM). Proposed emissions (in tons per year – TPY) are summarized below.

POLLUTANT	EMISSIONS INCREASE (TPY)
NO _x	858
SO ₂	124
PM-10	75
CO	366
SAM	15.2

Air Quality Related Values (AQRV) Analysis

JEA performed a regional haze analysis for Wolf Island, concluding that the project would not contribute significantly to visibility impairment in the area. In December 1998, we advised JEA that they should also evaluate regional haze impacts in Okefenokee. Regional haze analyses are required of sources greater than 50 km from a receptor in a Class I area. Although the project was only 34 km from the nearest boundary of the Class I area, the project was more than 50 km from some receptors in the Class I area. (Okefenokee is approximately 55 km from south to north.)

An Industrial Source Complex (ISC) modeling analysis by JEA indicated that the project had the potential to significantly contribute to regional haze at Okefenokee. On June 9, 1999, we advised the applicant, via phone, that they had several options, including reducing production, accepting lower emissions limits, or performing a refined modeling analysis (CALPUFF-Lite or CALPUFF). In any case, they needed to demonstrate that the project's emissions would not significantly contribute to visibility impairment in the Class I area.

The applicant chose to do an analysis with CALPUFF-Lite (a screening version of CALPUFF) and submitted the results June 24, 1999. Although this model predicted impacts lower than impacts predicted with ISC, they were still significant. The change in visibility (light extinction) while burning gas was predicted to be 5.6%. The change in visibility (light extinction) while burning fuel oil was predicted to be 27.2%. FWS considers a change of greater than 5% to be significant and a potential adverse impact to the Class I area. At this time we reiterated JEA's options (see above). JEA stated its intention of doing a CALPUFF analysis, a refined version of CALPUFF-Lite.

On July 19, 1999, in a phone conversation with JEA, we learned that they had not yet started the CALPUFF analysis. However, JEA requested that the Florida Department of Environmental Protection issue an intent to permit the project on August 15. We advised JEA that, if they do not demonstrate by that time that the project's emissions would not significantly contribute to regional haze, we would object to the project. JEA agreed to start the CALPUFF analysis immediately. In addition, JEA agreed to accept as a permit condition the shut-down of their Southside Generating Station, 15 km south of Brandy Branch. JEA believes that the Southside shut-down would result in an emissions decrease that would more than offset new emission impacts from Brandy Branch. We stated our support of the shut-down, as it would result in a high-emitting facility being replaced by a more efficient and lower-emitting facility. We noted that such offsets should result in a net benefit to air quality at the Class I area, and that this should be demonstrated by modeling.

In summary, JEA must demonstrate to us that the proposed Brandy Branch project will not cause additional visibility impairment at Okefenokee Wilderness. JEA has a variety of options for doing this, including choosing not to proceed with the project, reducing the project's emissions, offsetting the project's emissions with the shut-down of Southside Station, and conducting a more refined modeling analysis. If refined modeling still predicts a significant contribution to visibility impairment from the project, FWS will consider the magnitude, duration, and frequency of impacts, and other factors in making an adverse impact determination.

Contact: Ms. Ellen Porter, Air Quality Branch (303)969-2617.