

21 West Church Street  
Jacksonville, Florida 32202-3139

June 11, 2008

RECEIVED

JUN 16 2008

BUREAU OF AIR REGULATION



Ms. Trina L. Vielhauer, Chief  
Bureau of Air Regulation  
Division of Air Resource Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Northside Generating Station/SJRPP (Title V Permit No. 0310045-016-AV)  
Brandy Branch Generating Station (Title V Permit No. 0310485-16-AV)  
CAIR Part Submittal

ELECTRIC

Dear Ms. Vielhauer:

WATER

Per conversation with John Holtom of your staff, we would like to combine the recently submitted CAIR Part Title V revision requests with the Title V renewal applications that will be submitted soon for the above referenced facilities. We hereby agree to waive the processing clock for the CAIR Part revision applications to allow for the combination of the projects.

SEWER

If you have any questions, please contact Bert Gianazza at (904) 665-6247.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael J. Brost', with a long, sweeping flourish extending to the right.

Michael J. Brost, P.E.  
Vice President, Electric Systems  
Designated Representative

Cc: John Holtom, FDEP

**Sheplak, Scott**

- file -

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**From:** Tutt, Wayne [TUTT@coj.net]  
**Sent:** Tuesday, July 15, 2008 10:06 AM  
**To:** Robinson, Richard; Brown, Dana  
**Cc:** Sheplak, Scott  
**Subject:** RE: Compliance Review of Title V Air Operation Permit Renewal Application

Scott-  
 City of Jacksonville EQD has no outstanding compliance or enforcement actions against this facility. If you have any questions concerning this matter, you can contact me directly.

Wayne Tutt  
 tutt@coj.net

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**From:** Robinson, Richard  
**Sent:** Thursday, July 10, 2008 12:56 PM  
**To:** Tutt, Wayne; Brown, Dana  
**Cc:** Sheplak, Scott  
**Subject:** FW: Compliance Review of Title V Air Operation Permit Renewal Application

Please respond to Scott's e-mail below before August 3<sup>rd</sup> and copy me on your response. Thanks!

Richard L. Robinson, P.E.  
 Environmental Engineering Manager  
 Air Quality Branch  
 Environmental Quality Division  
 City of Jacksonville, Florida  
 117 West Duval Street, Suite 225  
 Jacksonville, FL 32202

Phone: (904) 630-4900  
 Fax: (904) 630-3638  
 E-Mail: robinson@coj.net

Please note: that under Florida's very broad public records law, e-mail communications to and from City officials may be subject to public disclosure.

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**From:** Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]  
**Sent:** Thursday, July 10, 2008 11:36 AM  
**To:** Robinson, Richard  
**Subject:** Compliance Review of Title V Air Operation Permit Renewal Application

Please pass this onto compliance ...

JEA - Brandy Branch Generating Station  
**Project No.:** 0310485-019-AV

On July 3, 2008, our office received the subject application via hard copy.

Each applicant's Responsible Official (R.O.) for a Title V permit is required to sign a certification of compliance and is also required to report the compliance status of each emissions unit. Any non-compliance at the time of application.

7/15/2008

and/or during the processing of the application requires a compliance plan to be submitted.

The applicant certified compliance in this permit application {see these two places in the application: (1) Application Information - R.O. Certification Statement, item 6.; and (2) Additional Requirements for Title V Air Operation Permit Applications - Compliance Report and Plan, item 3.}.

Please review this facility's status with your compliance & enforcement staff. Please notify me via email or hard-copy **either**:

- a. there are no outstanding compliance or enforcement actions with this facility; **or**
- b. the following outstanding compliance & enforcement issues exist (please list).

Please review the compliance status of this facility and send us your written comments within 30 days (**no later than August 3<sup>th</sup>**). Thank you for your cooperation.

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

**Sheplak, Scott***-file-*

**From:** Sheplak, Scott  
**Sent:** Thursday, August 14, 2008 9:28 AM  
**To:** 'Gianazza, N. Bert'  
**Subject:** RE: Request for Additional Information - Project No. 0310485-019-AV

This is fine, I'll keep this with the file. Your application is complete, have a good day!

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**From:** Gianazza, N. Bert [mailto:GianNB@jea.com]  
**Sent:** Thursday, August 14, 2008 9:25 AM  
**To:** Sheplak, Scott  
**Subject:** RE: Request for Additional Information - Project No. 0310485-019-AV

Scott,

I'd like to leave those in there. Do you need us to resubmit the list or is this email sufficient?

Tx, B.

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**From:** Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]  
**Sent:** Wednesday, August 13, 2008 4:59 PM  
**To:** Gianazza, N. Bert  
**Subject:** Request for Additional Information - Project No. 0310485-019-AV

Dear Mr. Gianazza:

The Department received the renewal application for the Brandy Brach Generating Station on July 3, 2008. Thank you for the hard copy submission. It was very well prepared. I have one minor question.

The proposed list of insignificant activities in the Title V permit renewal application (see Attachment D of the hard copy submission) is different from the current list in the **Appendix I-1, List of Insignificant Emissions Units and/or Activities** to the current Title V permit, Permit No. 0310485-016-AV.

1. The following emissions units and/or activities are not in the proposed list, yet are in the current permit:

"1. Sand blaster, welding, lathes, hand-held tools, etc."

"2. Diesel generator."

"7. Surface coating operations within a single facility if the total quantity of coatings containing greater than 5.0 percent VOCs, by volume, used is 6.0 gallons per day or less, averaged monthly provided:

a. Such operations are not subject to a volatile organic compound Reasonably Available Control Technology (RACT) requirement of Chapter 62-296, F.A.C.; and

b. The amount of coatings used shall include any solvents and thinners used in the process including those used for cleanup."

Are you requesting that these emissions units and/or activities not be included in the renewed permit?

If you should have any questions, please contact me by telephone at 850/921-9532 or by e-mail at [Scott.Sheplak@dep.state.fl.us](mailto:Scott.Sheplak@dep.state.fl.us).

8/14/2008

Sincerely,

Scott M. Sheplak  
DEP - Title V Section  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, FL 32399

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

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Florida has a very broad Public Records Law. Virtually all written communications to or from State and Local Officials and employees are public records available to the public and media upon request. JEA does not differentiate between personal and business e-mails. E-mail sent on the JEA system will be considered public and will only be withheld from disclosure if deemed confidential pursuant to State Law. Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public-records request, do not send electronic mail to this entity. Instead, contact JEA by phone or in writing.

**Sheplak, Scott***-file-*

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**From:** Sheplak, Scott  
**Sent:** Monday, August 18, 2008 9:28 AM  
**To:** 'Gianazza, N. Bert'  
**Subject:** RE: Request for Additional Information - Project No. 0310485-019-AV

It seems there were no embossed seals on the ones that were submitted; please submit another.

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**From:** Gianazza, N. Bert [mailto:GianNB@jea.com]  
**Sent:** Friday, August 15, 2008 8:12 AM  
**To:** Sheplak, Scott  
**Subject:** FW: Request for Additional Information - Project No. 0310485-019-AV

Scott,

I spoke with B&V who submitted the application on behalf of JEA. One original of the P.E. seal was submitted (attached is a photo copy), the rest were copies. Is the scanned attachment of what was originally submitted sufficient or do you need me to send you an original?

Tx, B.

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8/18/2008

**Sheplak, Scott**

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**From:** Walker, Elizabeth (AIR)  
**Sent:** Friday, August 29, 2008 8:30 AM  
**To:** Sheplak, Scott; Holtom, Jonathan  
**Cc:** Machinski, Susan  
**Subject:** RE: Applications

I sent them DHL Ground today. Hopefully, Susan, you will see it on Tuesday or Wednesday.

*Elizabeth Walker*

Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
(850)921-9505

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**From:** Sheplak, Scott  
**Sent:** Thursday, August 28, 2008 5:02 PM  
**To:** Holtom, Jonathan  
**Cc:** Walker, Elizabeth (AIR); Machinski, Susan  
**Subject:** RE: Applications

Roger.

Susan, I have some stuff to keep with the file for each one. I can brief you when you receive. Talk with you soon.

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**From:** Holtom, Jonathan  
**Sent:** Thursday, August 28, 2008 3:07 PM  
**To:** Sheplak, Scott  
**Cc:** Walker, Elizabeth (AIR); Machinski, Susan  
**Subject:** Applications

Scott, Scott 8/29/08

Please give your copies of the applications and any notes, etc. that you have for Brandy Branch and Orlando Cogen to Elizabeth, ASAP. She will make sure they get to Susan.

Thanks!

Jon