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September 22, 2004

SEP 24 2004

BUREAU OF AIR REGULATION

: :

JEA

Jim Pennington, P.E.

Administrator

Permitting North

Bureau of Air Regulation

Florida Department of Environmental Protection

2600 Blair Stone Road

Tallahassee, FL 32399-2400

WATER

SEWER

RE: Brandy Branch Generating Station

Simple Cycle Combustion Turbines (Units 1, 2, 3)

Title V. Permit 0310485-005-AV.

Air Construction Permit PSD-FL-267

Dear Mr. Pennington:

In accordance with the EPA final rule published in the Federal Register dated July 8, 2004 revising the standards of performance for stationary gas turbines (40 CFR 60, subpart GG), we request a revision to specific condition A.24 of the above referenced Title V permit and condition 44 of the above referenced PSD permit to remove the requirement for nitrogen testing of diesel fuel. NOx CEMs are used on these units to show compliance with the NOx limits, and the allowance for fuel bound nitrogen is not claimed.

If you have any questions, please don't hesitate to call me at 665-6247.

Sincerely,

N. Bert Gianazza, P.E.

Environmental Services

cc:

Robert S. Pace, P.E., EQD