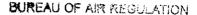


OCT 17 2006





October 12, 2006

Ms. Trina L. Vielhauer, Chief Bureau of Air Regulation Bureau of Air Regulation Department of Environmental Protection 2600 Blair Stone Road Tallahassee, FL 32399

Attention: Mr. Jeffery F. Koerner, P.E., Administrator

RE:

Northside Generating Station/St. Johns River Power Park (SJRPP)

Title V Permit 0310045-008-AV; PSD-FL-10

Request to Install Selective Catalytic Reduction (SCR)

Dear Mr. Koerner:

0310045-011-AC

SJRPP is requesting approval for the installation of SCR for Units 1 and 2 to meet the requirements of the Department's implementation of the Clean Air Interstate Rule (CAIR). The installation of SCR to meet the requirements of CAIR will substantially reduce the emissions of NO_x from these units. As an artifact of installing SCR, the SCR catalyst will potentially oxidize additional SO₂ to SO₃. Some of the SO₃ when traveling though the flue gas desulfurization (FGD) will be removed due to the alkaline nature of the limestone slurry. SO₃ leaving the FGD system will be converted to sulfuric acid mist (SAM) due the saturated conditions of the FGD and temperature. The additional SO₃ formed by the SCR catalyst will be controlled using ammonia injection between the air heater and electrostatic precipitator (ESP) in each unit. The SO₃ and ammonia will form ammonium sulfate that will be collected in the ESP as particulate matter. The amount of PM will also not increase. Therefore, no increase in annual emissions of SAM from SJRPP will occur as a result of the addition of the SCR systems.

SJRPP desires to initiate some construction activities in December 2006. The Department's expeditious review of the application is appreciated. Please call Jay Worley at (904) 665-8729 or our environmental consultant Ken Kosky at (352) 336-5600 if there are any questions.

Sincerely,

Michael J. Brost

JEA

Vice President, Electric Systems

Enclosures

cc: Hamilton Oven, P.E., Siting Coordination Office

Jay Worley, JEA/SJRPP

Ken Kosky, Golder Associates

0310045-017-AC