



June 7, 2001

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JUN 11 2001
BUREAU OF AIR REGULATION

Ms. Teresa Heron, Engineer
Florida Dept. of Environmental Protection
Division of Air Resource Management
Mail Station 5500
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Gainesville Regional Utilities (GRU)
J.R. Kelly Generating Station (Facility No. 0010005)
Combined Cycle Unit 1 (PSD-FL-276)
Permit Amendment Request
0010005-004-AC

Dear Ms. Heron:

GRU is requesting amendment of the above-referenced permit as follows:

"24. Annual, Initial and Performance Testing: ...No other test methods may be used for compliance testing unless prior DEP approval is received in writing.

- ...
- Initial (I) only for nitrogen oxides to demonstrate compliance with NSPS Subpart GG (40 CFR s. 60.332) using a certified CEMS to collect data, based on a minimum of three test runs representing a total of at least three hours of data. The CEMS must be calibrated in accordance with the procedure in Section 6.2.3 of Method 20 following each run. The requirement under 40 CFR s. 60.335(c)(2), (3) to perform a Method 20 test at four separate loads is waived. The test data shall be corrected to ISO conditions for demonstrating compliance with 40 CFR s. 60.332."

Rationale: The proposed language clarifies the testing requirements based on EPA Region 4's guidance titled "Approval of Routine Alternative Testing and Monitoring Procedures for Combustion Turbines Regulated Under New Source Performance Standards" (May 26, 2000).

A similar requirement is embodied in the facility's Title V permit in Condition E.21. GRU requests that this condition be revised to conform with the Condition 24 in the PSD permit as proposed above.

As we discussed, our current schedule envisions that we will be conducting initial performance testing on this unit while burning natural gas on Friday, June 15, 2001. We would very much appreciate having the testing requirements clarified prior to this date.

Please call Ms. Yolanta Jonynas at 352-334-3400 Ext. 1284 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Darrell R. DuBose". The signature is fluid and cursive, with a long horizontal stroke at the end.

Darrell R. DuBose
Assistant General Manager Energy Supply/Responsible Official

xc: Y. Jonynas
R. Klemans
S. Sheplak, FDEP-Tall.
G. Swanson
D. Thompson
JRKCC1



Energy Supply Administration

February 22, 2001

Mr. Clair Fancy, Chief Air Regulation
Florida Dept. of Environmental Protection
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

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FEB 23 2001

BUREAU OF AIR REGULATION

RE: Gainesville Regional Utilities
J.R. Kelly Generating Station (Facility No. 0010005; ORIS Code: 664)
Combined Cycle No. 1 (PSD-FL-276 and 0010005-003-AV)
New Unit Notification

Dear Mr. Fancy:

Pursuant to 40 CFR 75.61(a)(2)(ii) notification is hereby provided that the new combustion turbine associated with the above-referenced unit commenced commercial operation as defined in 40 CFR 72.2 on February 17, 2001. Please note that our original notification filed on October 26, 2000 pursuant to 40 CFR 75.61(a)(2)(i) should have stated that the unit was expected to "commence commercial operation" on November 27, 2000. Instead, that notification indicated that the unit was expected to "exhaust emissions to the atmosphere", a term that applies to existing units with new stacks not to new units according to EPA. I apologize for any confusion this may have caused.

Please call me at (352) 334-3400 Ext. 1789 or Yolanta Jonynas at Ext. 1284 if you have any questions.

Sincerely,

Darrell R. DuBose

Assistant General Manager of Energy Supply/Designated Representative

- xc: D. Beck
M. Costello, FDEP - Tallahassee
J. Jachin, EPA - Region IV
Y. Jonynas
C. Kirts, FDEP - NE District Office, Jax.
R. Klemans
L. Lalwani, FDEP - NE District Branch Office, Gville.
A. Linero, FDEP - Tallahassee
S. Sheplak, FDEP - Tallahassee
G. Swanson
D. Thompson
JRKCC1

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Energy Supply Administration

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February 22, 2001

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FEB 23 2001

Mr. Clair Fancy, Chief
Bureau of Air Regulation
Florida Dept. of Environmental Regulation
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

RE: Gainesville Regional Utilities
J.R. Kelly Generating Station (Facility ID No. 0010005)
Combined Cycle No. 1 (PSD-FL-276 and 0010005-004-AV)
Notice of Actual Startup Date

Dear Mr. Fancy:

In accordance with 40 CFR 60.7(a)(3) notice is hereby provided that the actual startup date of the above-referenced unit was February 17, 2001.

Please call me or Yolanta Jonynas at (352) 334-3400 Ext. 1789 or 1284, respectively, if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Darrell R. DuBose".

Darrell R. DuBose
Assistant General Manager of Energy Supply/Responsible Official

xc: D. Beck
Y. Jonynas
C. Kirts, FDEP - NE District Office
R. Klemans
L. Lalwani, FDEP - NE District Branch Office
A. Linero, FDEP - Tallahassee
S. Sheplak, FDEP - Tallahassee
S. Manasco
G. Swanson
D. Thompson
JRK CC1

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