

-file-

Sheplak, Scott

From: Banks, Richard
Sent: Friday, July 11, 2008 7:53 AM
To: Sheplak, Scott
Cc: Kirts, Christopher
Subject: RE: Compliance Review of Title V Air Operation Permit Renewal Application

Scott,

There are no outstanding compliance or enforcement actions with City of Gainesville, Gainesville Regional Utilities (GRU) - J.R. Kelly Generating Station.

The Project No. listed is for Lakeland Electric. They apparently have some unresolved significant non-compliance dated 10/02/07.

From: Sheplak, Scott
Sent: Thursday, July 10, 2008 2:50 PM
To: Banks, Richard
Subject: Compliance Review of Title V Air Operation Permit Renewal Application

City of Gainesville, Gainesville Regional Utilities (GRU) - J.R. Kelly Generating Station
Project No. 1050004-023-AV

On July 1, 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 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 1st**). Thank you for your cooperation.

7/29/2008



Environmental Consulting & Technology, Inc.

August 19, 2008

SENT VIA FEDEX

Mr. Scott M. Sheplak, P.E.
Florida Department of Environmental Protection
Division of Air Resource Management - Title V Section
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

**Re: Gainesville Regional Utilities - J.R. Kelly Generating Station
Title V Air Operation Permit Renewal Application
Project No. 0010005-005-AV
Request for Additional Information**

Dear Mr. Sheplak:

The City of Gainesville; Gainesville Regional Utilities (GRU) submitted a Title V Air Operation Permit Application to the Department on July 1, 2008. In response to your request for additional information dated August 6, 2008, please find enclosed an amended Acid Rain Part Application and a Retired Acid Rain Form.

As we discussed, GRU requests that the Department change the Application Responsible Official for the J.R. Kelly Generating Station from Ms. Karen C. Alford to Mr. John W. Stanton. Mr. Stanton is GRU's Assistant General Manager – Energy Supply. A completed Application Responsible Official Certification for Mr. Stanton is also enclosed.

Please contact Regina Embry at (352) 393-1299 or email at embryrg@gru.com if any additional information is needed regarding this application.

Sincerely,

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Thomas W. Davis, P.E.
Vice President

cc: Mr. Chris Kirts, P.E., FDEP Northeast District
Mr. Tom Cascio, FDEP Tallahassee
Ms. Regina Embry, GRU

Enclosures

RECEIVED

AUG 20 2008

BUREAU OF AIR REGULATION

3701 Northwest
98th Street
Gainesville, FL
32606

(352)
332-0444

FAX (352)
332-6722

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/ revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

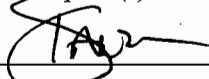
1. Application Responsible Official Name:
John W. Stanton, Assistant General Manager – Energy Supply
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

- For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
- For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
- For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
- The designated representative at an Acid Rain source.

3. Application Responsible Official Mailing Address...
Organization/Firm: **City of Gainesville, Gainesville Regional Utilities (GRU)**
Street Address: **P.O. Box 147117 (A132)**
City: **Gainesville** State: **Florida** Zip Code: **32614-7117**

4. Application Responsible Official Telephone Numbers...
Telephone: **(352) 393-1789** ext. Fax: **(352) 334-2786**
5. Application Responsible Official Email Address: **stantonjw@gru.com**
6. Application Responsible Official Certification:

I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.



Signature

8-15-08

Date

Acid Rain Part Application

For more information, see instructions and refer to 40 CFR 72.30, 72.31, and 74; and Chapter 62-214, F.A.C.

This submission is: New Revised Renewal

STEP 1

Identify the source by plant name, state, and ORIS or plant code.

J.R. Kelly Plant name	Florida State	0664 ORIS/Plant Code
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STEP 2

Enter the unit ID# for every Acid Rain unit at the Acid Rain source in column "a."

If unit a SO₂ Opt-in unit, enter "yes" in column "b".

For new units or SO₂ Opt-in units, enter the requested information in columns "d" and "e."

a	b	c	d	e
Unit ID#	SO ₂ Opt-in Unit? (Yes or No)	Unit will hold allowances in accordance with 40 CFR 72.9(c)(1)	New or SO ₂ Opt-in Units Commence Operation Date	New or SO ₂ Opt-in Units Monitor Certification Deadline
CC1	No	Yes	N/A	N/A
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		

RECEIVED

AUG 20 2008

BUREAU OF AIR REGULATION

J.R. Kelly

Plant Name (from STEP 1)

STEP 3

Read the standard requirements.

Acid Rain Part Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain Part application (including a compliance plan) under 40 CFR Part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the DEP determines is necessary in order to review an Acid Rain Part application and issue or deny an Acid Rain Part;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain Part application or a superseding Acid Rain Part issued by the DEP; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR Part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR Part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.
- (4) For applications including a SO₂ Opt-in unit, a monitoring plan for each SO₂ Opt-in unit must be submitted with this application pursuant to 40 CFR 74.14(a). For renewal applications for SO₂ Opt-in units include an updated monitoring plan if applicable under 40 CFR 75.53(b).

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another Acid Rain unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000, or the deadline for monitor certification under 40 CFR Part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain Part application, the Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR Part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR Part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR Part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the DEP:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR Part 75, provided that to the extent that 40 CFR Part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and

J.R. Kelly

Plant Name (from STEP 1)

**STEP 3,
Continued.**

Recordkeeping and Reporting Requirements (cont)

(iv) Copies of all documents used to complete an Acid Rain Part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR Part 72, Subpart I, and 40 CFR Part 75.

Liability.

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.

(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.

(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.

(4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.

(5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.

(6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR Part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

(7) Each violation of a provision of 40 CFR Parts 72, 73, 74, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities.

No provision of the Acid Rain Program, an Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;

(3) Requiring a change of any kind in any state law regulating electric utility rates and charges, affecting any state law regarding such state regulation, or limiting such state regulation, including any prudence review requirements under such state law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a state in which such program is established.

**STEP 4
For SO₂ Opt-in
units only.**

**In column "f" enter
the unit ID# for
every SO₂ Opt-in
unit identified in
column "a" of
STEP 2.**

**For column "g"
describe the
combustion unit
and attach
information and
diagrams on the
combustion unit's
configuration.**

**In column "h"
enter the hours.**

f	g	h (not required for renewal application)
Unit ID#	Description of the combustion unit	Number of hours unit operated in the six months preceding initial application

J.R. Kelly
 Plant Name (from STEP 1)

STEP 5

For SO₂ Opt-in units only.
 (Not required for SO₂ Opt-in renewal applications.)

In column "i" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" (and in column "f").

For columns "j" through "n," enter the information required under 40 CFR 74.20-74.25 and attach all supporting documentation required by 40 CFR 74.20-74.25.

i	j	k	l	m	n
Unit ID#	Baseline or Alternative Baseline under 40 CFR 74.20 (mmBtu)	Actual SO ₂ Emissions Rate under 40 CFR 74.22 (lbs/mmBtu)	Allowable 1985 SO ₂ Emissions Rate under 40 CFR 74.23 (lbs/mmBtu)	Current Allowable SO ₂ Emissions Rate under 40 CFR 74.24 (lbs/mmBtu)	Current Promulgated SO ₂ Emissions Rate under 40 CFR 74.25 (lbs/mmBtu)

STEP 6

For SO₂ Opt-in units only.

Attach additional requirements, certify and sign.

- A. If the combustion source seeks to qualify for a transfer of allowances from the replacement of thermal energy, a thermal energy plan as provided in 40 CFR 74.47 for combustion sources must be attached.
- B. A statement whether the combustion unit was previously an affected unit under 40 CFR 74.
- C. A statement that the combustion unit is not an affected unit under 40 CFR 72.6 and does not have an exemption under 40 CFR 72.7, 72.8, or 72.14.
- D. Attach a complete compliance plan for SO₂ under 40 CFR 72.40.
- E. The designated representative of the combustion unit shall submit a monitoring plan in accordance with 40 CFR 74.61. For renewal application, submit an updated monitoring plan if applicable under 40 CFR 75.53(b).
- F. The following statement must be signed by the designated representative or alternate designated representative of the combustion source: "I certify that the data submitted under 40 CFR Part 74, Subpart C, reflects actual operations of the combustion source and has not been adjusted in any way."

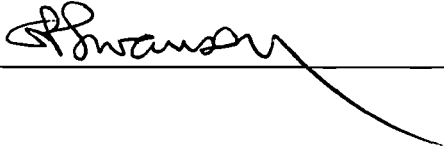
Signature	Date
-----------	------

STEP 7

Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

Certification (for designated representative or alternate designated representative only)

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Gary P. Swanson Name	Plant Manager Title
City of Gainesville, Gainesville Regional Utilities (GRU) Owner Company Name	
(352) 334-3400 Phone	swansongp@gru.com E-mail address
Signature 	Date 8/14/08

Acid Rain, CAIR, and Hg Budget Retired Unit Exemption

For more information, see instructions and refer to 40 CFR 72.8, 96.105, 96.205, 96.305, and 60.4105; and Rules 62-214.340(2), 62-296.470, and 62-296.480, F.A.C.

This submission is: New Revised

STEP 1

Identify the unit by plant name, State, ORIS code and unit ID#.

J.R. Kelly	FL	0664	JRK8
Plant Name	State	ORIS/Plant Code	Unit ID#

Applicable Program(s): Acid Rain CAIR NO_x Annual CAIR SO₂ CAIR NO_x Ozone Season
 ~ Mercury (Hg) Budget Trading

STEP 2

Identify the date on which the unit was (or will be) permanently retired.

September 2, 2000

STEP 3

If an acid rain affected unit, identify the first full calendar year in which the unit meets (or will meet) the requirements of 40 CFR 72.8(d).

January 1, _____

STEP 4

Read the special provisions.

Acid Rain Special Provisions

- (1) A unit exempt under Rule 62-214.340(2), F.A.C., shall not emit any sulfur dioxide and nitrogen oxides starting on the date that the exemption takes effect. The owners and operators of the unit will be allocated allowances in accordance with 40 CFR Part 73, Subpart B. If the unit is a Phase I unit, for each calendar year in Phase I, the designated representative of the unit shall submit a Phase I permit application in accordance with 40 CFR Part 72, Subparts C and D, and an annual certification report in accordance with 40 CFR 72.90 through 72.92 and is subject to 40 CFR 72.95 and 72.96.
- (2) A unit exempt under Rule 62-214.340(2), F.A.C., shall not resume operation unless the designated representative of the source that includes the unit submits a complete Acid Rain Part application under Rule 62-214.320, F.A.C., for the unit not less than 24 months prior to the date on which the unit is first to resume operation.
- (3) The owners and operators and, to the extent applicable, the designated representative of a unit exempt under Rule 62-214.340(2), F.A.C., shall comply with the requirements of Chapter 62-214, F.A.C., and the Acid Rain Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (4) For any period for which a unit is exempt under Rule 62-214.340(2), F.A.C., the unit is not an Acid Rain unit and is not eligible to be an opt-in source under 40 CFR Part 74. As a non-Acid Rain Unit, the unit shall continue to be subject to any other applicable requirements under Chapter 62-213, F.A.C.
- (5) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under Rule 62-214.340(2), F.A.C., shall retain at the source that includes the unit records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the EPA or the DEP. The owners and operators bear the burden of proof that the unit is permanently retired.
- (6) On the earlier of the following dates, a unit exempt under Rule 62-214.340(2), F.A.C., shall lose its exemption and become an Acid Rain Unit: (i) the date on which the designated representative submits an Acid Rain Part application under paragraph (2); or (ii) the date on which the designated representative is required under paragraph (2) to submit an Acid Rain Part application. For the purpose of applying monitoring requirements under 40 CFR Part 75, a unit that loses its exemption under Rule 62-214.340(2), F.A.C., shall be treated as a new unit that commenced commercial operation on the first date on which the unit resumes operation.

J.R. Kelly

Plant Name (from STEP 1)

STEP 4
(continued)

CAIR Special Provisions

- (1) A unit exempt under 40 CFR 96.105(a), 96.205(a), or 96.305(a), shall not emit any sulfur dioxide or nitrogen oxides starting on the date that the exemption takes effect. The DEP will allocate CAIR NO_x allowances in accordance with Rule 62-296.470, F.A.C.
- (2) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under Rule 62-296.470, F.A.C., shall retain at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the EPA or the DEP. The owners and operators bear the burden of proof that the unit is permanently retired.
- (3) The owners and operators and, to the extent applicable, the CAIR designated representative of a unit exempt under 40 CFR 96.105(a), 96.205(a), or 96.305(a), shall comply with the applicable requirements of the CAIR NO_x Annual Trading Program, the CAIR SO₂ Trading Program, and the CAIR NO_x Ozone Season Trading Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (4) A unit exempt under 40 CFR 96.105(a), 96.205(a), or 96.305(a), and located at a source that is required, or but for this exemption would be required, to have a title V operating permit shall not resume operation unless the CAIR designated representative of the source submits a complete CAIR Part application under Rule 62-213.420, F.A.C., for the unit before the date on which the unit resumes operation.
- (5) On the earlier of the following dates, a unit exempt under 40 CFR 96.105(a), 96.205(a), or 96.305(a) shall lose its exemption:
 - (i) the date on which the CAIR designated representative submits a CAIR Part application under Special Provision (4) above;
 - (ii) the date on which the CAIR designated representative is required under Special Provision (4) above to submit an CAIR Part application for the unit; or
 - (iii) the date on which the unit resumes operation, if the CAIR designated representative is not required to submit a CAIR Part application for the unit.
- (6) For the purpose of applying monitoring, reporting and recordkeeping requirements under 40 CFR Part 96, Subparts HH, HHH, and/or HHHH, a unit that loses its exemption under 40 CFR 96.105(a), 96.205(a), or 96.305(a), shall be treated as a unit that commences commercial operation on the first date on which the unit resumes operation.

Mercury (Hg) Budget Trading Special Provisions

- (1) A unit exempt under 40 CFR 60.4105(a) shall not emit any mercury starting on the date that the exemption takes effect.
- (2) The DEP will allocate Hg allowances under Rule 62-296.480, F.A.C.
- (3) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under 40 CFR 60.4105(a) shall retain at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any before the end of the period, in writing by the EPA or the DEP. The owners and operators bear the burden of proof that the unit is permanently retired.
- (4) The owners and operators and, to the extent applicable, the Hg designated representative of a unit exempt under 40 CFR 60.4105(a) shall comply with the requirements of the Hg Budget Trading Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (5) A unit exempt under 40 CFR 60.4105(a) and located at a source that is required, or but for this exemption would be required, to have a title V operating permit shall not resume operation unless the Hg designated representative of the source submits a complete Hg Budget Part application under 40 CFR 60.4122 and Rule 62-213.420, F.A.C., for the unit before the date on which the unit resumes operation.
- (6) On the earlier of the following dates, a unit exempt under 40 CFR 60.4105(a) shall lose its exemption:
 - (i) the date on which the Hg designated representative submits a Hg Budget Part application for the unit under Special Provision (5);
 - (ii) the date on which the Hg designated representative is required under Special Provision (5) to submit a Hg Budget Part application for the unit; or
 - (iii) the date on which the unit resumes operation, if the Hg designated representative is not required to submit a Hg Budget Part application for the unit.
- (7) For the purpose of applying monitoring, reporting and recordkeeping requirements under 40 CFR 60.4170 through 60.4176, a unit that loses its exemption under 40 CFR 60.4105(a) shall be treated as a unit that commences operation and commercial operation on the first date on which the unit resumes operation.

J.R. Kelly Plant Name (from STEP 1)

STEP 5
Make Statement of Compliance.


Statement of Compliance

I state that the unit identified above in STEP 1 was (or will be) permanently retired on the date identified in STEP 2 and will comply with the Special Provisions listed in STEP 4.

STEP 6
Read the certification and sign and date.

Certification (for designated representatives or alternate designated representatives only)

I am authorized to make this submission on behalf of the owners and operators of the affected source and affected unit for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Gary P. Swanson Name		Plant Manager Title	
City of Gainesville, Gainesville Regional Utilities (GRU) Owner Company Name			
(352) 334-3400 Phone		swansongp@gru.com E-mail address	
Signature 		Date 8/11/08	

Sheplak, Scott

-file-

From: Holtom, Jonathan
Sent: Tuesday, September 30, 2008 12:15 PM
To: Long, Terri
Cc: Sheplak, Scott
Subject: RE: SIP approved rule(s)

Thank you Terri!

Scott, please remove my highlighting on those conditions and reprint the permit for Vickie. Thanks!

Jon

From: Long, Terri
Sent: Tuesday, September 30, 2008 12:08 PM
To: Holtom, Jonathan
Cc: Sheplak, Scott
Subject: RE: SIP approved rule(s)

The change to rule 62-296.405(1)(e)1., F.A.C., was incorporated into the SIP Number 1999-01, Permitting and Compliance Simplification, Submitted for approval to EPA on June 23, 1999, and to date has not been approved. The permit language below is correct based on that.

Let me know if you have any other questions.
 Thanks,

*Terri Long
 Department of Environmental Protection
 Division of Air Resource Management, OPAPM
 2600 Blair Stone Road
 Mail Station 5500
 Tallahassee, Florida 32399
 terri.long@dep.state.fl.us
 850 921-9556
 Suncom 291-9556*

From: Holtom, Jonathan
Sent: Tuesday, September 30, 2008 10:27 AM
To: Long, Terri
Cc: Sheplak, Scott
Subject: FW: SIP approved rule(s)

Hi Terri,

I'm not sure if Larry is back in the office yet, so I am forwarding Scott's email to you to see if you happen to know the answer. I would like to have the permit reading correctly before sending out the draft in the next few days, if possible. Thanks for your help!

Jon

From: Sheplak, Scott
Sent: Tuesday, September 30, 2008 9:49 AM
To: George, Larry
Cc: Holtom, Jonathan
Subject: SIP approved rule(s)

9/30/2008

We have these two conditions in a Title V permit that referenced a SIP submittal. Have these been approved into our SIP by U.S. EPA? We are trying to issue a Draft renewal by 10/3, this Friday. If you do not readily know, a response by November 7, 2008 should be fine so that we can finalize the Proposed permit. Thanks.

{Permitting Note: Upon the date of final SIP (State Implementation Plan) approval of Rule 62-296.405(1)(e)1., F.A.C., which was submitted to the U.S. EPA, Region 4, for SIP approval on June 23, 1999, Specific Condition **A.17.1.** becomes obsolete.}

A.17.1. Visible emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. [Rule 62-296.405(1)(e)1., F.A.C.]

{Permitting Note: The rule cited in Specific Condition **A.17.2.** has not been approved in the SIP by the U.S. EPA, Region 4, and was not available at the time of issuance of the initial Title V permit. Because it is state enforceable, the rule has been incorporated at the applicant's request.}

A.17.2. Visible emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. In lieu of the Method 9 testing, a transmissometer utilizing a 6-minute block average for opacity measurement may be used, provided such transmissometer is installed, certified, calibrated, operated and maintained in accordance with the provisions of 40 CFR 75. [Rule 62-296.405(1)(e)1., F.A.C.]

Sheplak, Scott

- file -

From: Sheplak, Scott
Sent: Thursday, September 18, 2008 10:31 AM
To: Linero, Alvaro
Cc: Holtom, Jonathan
Subject: RE: Heat Input J.R. Kelly

I assume this was from the PSD-FL-276. I concur. Thanks Al.

From: Linero, Alvaro
Sent: Thursday, September 18, 2008 9:30 AM
To: Holtom, Jonathan; Sheplak, Scott
Subject: Heat Input J.R. Kelly

Jon, Scott:

I reviewed the GRU J.R. Kelly permitting history.

This was a repowering project and I had less concern about capacities and more concern about reasonable assurance that they could net out of PSD for NOx which is the key pollutant for that unit.

Their 2007 CEMS-based NOx emissions were 30 ton of NOx and less than 1 ton of SO2.

I recommend rolling the AC capacity condition including the note into the facility Title V permit.

Thanks.

Al Linero.

9/18/2008

PREVENTION OF SIGNIFICANT DETERIORATION PERMIT PSD-FL-276

SECTION III - EMISSIONS UNIT SPECIFIC CONDITIONS

APPLICABLE STANDARDS AND REGULATIONS:

1. NSPS Requirements – Subpart GG: The Unit shall comply with all applicable provisions of 40CFR60, Subpart GG, Standards of Performance for Stationary Gas Turbines, adopted by reference in Rule 62-204.800(7)(b), F.A.C. The Subpart GG requirement to correct test data to ISO conditions applies when determining compliance with the emissions limitations specified therein.
2. NSPS Requirements – Subpart A: These emission units shall comply with all applicable requirements of 40CFR60, Subpart A, General Provisions including:
 - 40CFR60.7, Notification and Recordkeeping
 - 40CFR60.8, Performance Tests
 - 40CFR60.11, Compliance with Standards and Maintenance Requirements
 - 40CFR60.12, Circumvention
 - 40CFR60.13, Monitoring Requirements
 - 40CFR60.19, General Notification and Reporting requirements
3. BACT Requirements: This emissions unit is subject to Best Available Control Technology (BACT) emissions limits for carbon monoxide (CO) and particulate matter smaller than 10 microns (PM₁₀).
4. Applicable Regulations: Unless otherwise indicated in this permit, the construction and operation of the subject emission unit(s) shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-17, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297; and the applicable requirements of the Code of Federal Regulations (CFR) Title 40, Parts 51, 52, 60, 72, 73, and 75, adopted by reference in Rule 62-204.800, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]

GENERAL OPERATION REQUIREMENTS

5. Fuels: Only pipeline natural gas or maximum 0.05 percent sulfur No. 2 or superior grade of distillate fuel oil shall be fired in this unit. [Applicant Request, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]
6. Combustion Turbine Capacity: The maximum heat input rates, based on the higher heating value (HHV) of each fuel to this Unit at ambient conditions of 20°F temperature, 60% relative humidity, 100% load, and 14.7 psi pressure shall not exceed 1,083 million Btu per hour (mmBtu/hr) when firing natural gas, nor 1,121 mmBtu/hr when firing No. 2 or superior grade of distillate fuel oil. These maximum heat input rates will vary depending upon ambient conditions and the combustion turbine characteristics. Manufacturer's curves corrected for site conditions or equations for correction to other ambient conditions shall be provided to the Department of Environmental Protection (DEP) within 45 days of completing the initial compliance testing. [Design, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

{Permitting note: The heat input rates have been placed in the permit to identify the capacity of the emission unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emission's unit rate capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability. The owner or operator is expected to determine heat input whenever emission testing is required in order to demonstrate what percentage of the rated capacity that the unit was tested. Such heat input determinations may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heating value of the fuel determined by the fuel vendor or the owner or operator.}



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

PERMITTEE:

Gainesville Regional Utilities (GRU)
Post Office Box 147117 (A134)
Gainesville, Florida 32601-7060

Permit No.	PSD-FL-276
File No.	0010005-002-AC
SIC No.	4911
Expires:	December 31, 2001

Authorized Representative:

Michael L. Kurtz – General Manager

PROJECT AND LOCATION:

Air Construction Permit pursuant to the requirements for the Prevention of Significant Deterioration of Air Quality (PSD Permit) for the construction of: a nominal 83 megawatt (MW) natural gas and No. 2 distillate fuel oil-fired combustion turbine-electrical generator; an unfired heat recovery steam generator (HRSG); a 102 foot stack for combined cycle operation; a 88 foot bypass stack for simple cycle operation and ancillary equipment. Steam produced by the HRSG will be routed to the existing Unit No. 8 steam turbine-electrical generator to generate 40-50 MW of additional electricity. The combustion turbine may be equipped with inlet air conditioning devices (e.g., evaporative chillers, foggers, etc.). This unit is designated as Combined Cycle Unit CC-1 and will be located at the J.R. Kelly Generating Station, 605 Southeast 3rd Street in Gainesville, Alachua County. UTM coordinates are: Zone 17; 372.0 km E; 3,280.2 km N.

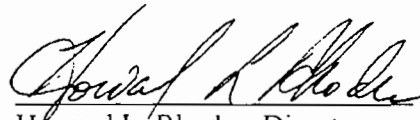
STATEMENT OF BASIS:

This Air Construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached Appendices and Tables made a part of this permit:

Appendix BD
Appendix GC

BACT Determination
Construction Permit General Conditions


Howard L. Rhodes, Director
Division of Air Resources
Management

"More Protection, Less Process"

Printed on recycled paper.

Sheplak, Scott

file-

From: Holtom, Jonathan
Sent: Tuesday, September 30, 2008 11:43 AM
To: Sheplak, Scott
Subject: 0010005-008-AV Draft Permit version dated 9 26 2008 jh
Attachments: 0010005-008-AV Draft Permit version dated 9 26 2008 jh.doc

Here is your JR Kelly, reformatted and nearly ready to go. Need to address A.19. with response from Larry, then reprint. Thanks for your help!

Jon.

9/30/2008

Sheplak, Scott

- file -

From: Holtom, Jonathan
Sent: Thursday, November 13, 2008 5:14 PM
To: Sheplak, Scott
Subject: FW: GRU excess emissions change

FYI, for your records.

Jon

From: Vielhauer, Trina
Sent: Thursday, November 13, 2008 4:22 PM
To: Holtom, Jonathan
Subject: RE: GRU excess emissions change

that does it. Thanks

From: Holtom, Jonathan
Sent: Thursday, November 13, 2008 4:17 PM
To: Vielhauer, Trina
Subject: RE: GRU excess emissions change

How about if we remove the a., b. and c. from the permitting note and just reference the entire condition B.18?

{Permitting note: The periods of excess emissions authorized in B.18. are the only periods of operation that are allowed to be excluded from the calculation of the 720-hour block average. All other periods of emissions are considered part of normal operation and must be included in determining compliance with the 720-hour block average.}

Jon Holtom, P.E., CPM
 Title V Program Administrator
 Bureau of Air Regulation
 (850) 921-9531

From: Vielhauer, Trina
Sent: Thursday, November 13, 2008 4:14 PM
To: Holtom, Jonathan
Subject: RE: GRU excess emissions change

Its close. My only question now is can they exclude the 2 hours (from lead-in paragraph) or JUST the a-c? I think the intent is to allow the 2 hours for s/s/fs/m also?

From: Holtom, Jonathan
Sent: Thursday, November 13, 2008 4:07 PM
To: Vielhauer, Trina
Subject: GRU excess emissions change

Trina, does this sound better to you?

B.18. Excess Emissions Allowed. Excess emissions (as defined below) resulting from startup, shutdown, fuel switching, or malfunction shall be permitted provided that best operational practices are adhered to, and the duration of excess emissions shall be minimized. Excess emissions occurrences shall in no case exceed two hours in any 24-

11/14/2008

hour period, except as follows:

- a. During "cold start-up" to combined cycle plant operation up to 4 (four) hours of excess emissions are allowed. Cold start-up is defined as a startup that occurs after a complete shutdown lasting at least 48 (forty eight) hours.
- b. During shutdowns from combined cycle operation, up to 3 (three) hours of excess emissions are allowed.
- c. Unless authorized by the Department.

NO_x CEM data shall be recorded and included in calculating the annual NO_x emissions. These allowable excess emissions shall be excluded from the calculation of the 720-hour block average. Excess emissions are defined as 1 (one)-hour periods when the NO_x emissions are above 9/42 ppmvd @ 15% oxygen while firing natural gas and fuel oil, respectively. [Rule 62-210.700(1)&(5), F.A.C.; G.E. Combined Cycle Startup Curves Data; and 0010005-002-AC, Specific Condition 21.]

{Permitting note: The periods of excess emissions authorized in B.18.a., b. and c. are the only periods of operation that are allowed to be excluded from the calculation of the 720-hour block average. All other periods of emissions are considered part of normal operation and must be included in determining compliance with the 720-hour block average.}

Holtom, Jonathan

- file -

From: Holtom, Jonathan
Sent: Monday, September 22, 2008 4:02 PM
To: Sheplak, Scott; Cascio, Tom
Subject: FW: Permit Headings?

Tracking:	Recipient	Delivery	Read
	Sheplak, Scott		Read: 9/22/2008 4:06 PM
	Cascio, Tom	Delivered: 9/22/2008 4:02 PM	Read: 9/23/2008 8:02 AM

FYI, numbering and indention style for the new formats.

From: Holtom, Jonathan
Sent: Monday, September 22, 2008 11:58 AM
To: Machinski, Susan
Subject: RE: Permit Headings?

Hi Susan,

Using ¼ inch tabs, the current format is as follows:

Section III. Emissions Units and Specific Conditions.
 Subsection A. Emissions Unit 00X.

- A.1. Heading.
 a. *Italicized heading.*
 (1) No heading unless really needed for clarity, then it would be regular type, no underline.
 (a) No heading.
 i.
 ii.
 iii.

And yes, I know this is nearly opposite of how our rules are outlined. I tried to change to match the rule format, but was over-ruled. I hope you are having a very happy Monday!

Jon

From: Machinski, Susan
Sent: Monday, September 22, 2008 10:10 AM
To: Holtom, Jonathan
Subject: Permit Headings?

Please refresh my memory..What is the Heading numbering standard for your permits? Is it:

- A.7. Heading
 (1) Heading
 (a) No Heading

Thanks,
 Susan

9/23/2008



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

August 6, 2008

Sent via Electronic Mail - Received Receipt Requested

alfordke@gru.com

Ms. Karen C. Alford
Administrative Director for Energy Supply
City of Gainesville
Gainesville Regional Utilities (GRU)
P.O. Box 147117, Station A132
Gainesville, Florida 32614-7117

Re: Request for Additional Information
Project Number 0010005-008-AV, Title V Air Operation Permit Renewal Application
J.R. Kelly Generating Station

Dear Ms. Alford:

The Department received the subject application for a Title V air operation permit renewal via the hard copy submittal on July 1, 2007. The J.R. Kelly Generating Station is located in Alachua County at 605 Southeast 3rd Street, Gainesville.

In order to continue processing your application, the Department will need the additional information items requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revisions to the application.

Additional Information Items

1. Acid Rain. As part of this Title V permit renewal application an acid rain part application, DEP Form No. 62-210.900(1)(a) - Form, Effective: 3/16/08 was submitted. The J.R. Kelly plant has both acid rain and non-acid rain units. The EPA Unit ID# "CC1," known as Combined-Cycle Unit (E.U. ID No. -010), is an acid rain unit. The EPA Unit ID# "JRK8," known as Fossil Fuel Fired Steam Generator #8 (boiler) (E.U. ID No. -008), is a permanently retired unit; the date of permanent retirement was September 2, 2000.

The U.S. EPA classifies a permanently retired unit as a "non-acid unit" as indicated by the excerpt below from the retired unit exemption form, DEP Form No. 62-210.900(1)(d) - Form, Effective: 3/16/08.

...

Acid Rain Special Provisions

...

(4) For any period for which a unit is exempt under Rule 62-214.340(2), F.A.C., **the unit is not an Acid Rain unit (emphasis added)** and is not eligible to be an opt-in source under 40 CFR Part 74. **As a non-Acid Rain Unit (emphasis added)**, the unit shall continue to be subject to any other applicable requirements under Chapter 62-213, F.A.C.

...

Retired units should therefore not be listed as "acid rain units" on the acid rain part application form.

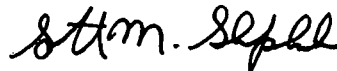
After reviewing the applicable acid rain federal regulations & state rules it is not clear how to best handle retired units in a Title V permit renewal application. It is clear that a unit needs to make the initial notification to obtain the retired unit exemption status (see Rule 62-214.340(2)(a), F.A.C.). Subparagraph 1. of this rule seems to indicate that this is a on-time notice.

Applicants have in the past provided another Retired Unit Exemption form, DEP Form No. No. 62-210.900(1)(d) - Form, Effective: 3/16/08 as part of the Title V permit renewal application. The Department has internally discussed this situation further. As a result of these recent discussions, please provide: (1) an amended Acid Rain Part Application form without the retired unit; and, (2) a completed Retired Acid Rain unit form for the retired unit. Both of these forms can be found posted on our internet site at <http://www.dep.state.fl.us/Air/forms.htm>.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department Title V air operation permit must be certified by a professional engineer (P.E.) registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. The requested item(s) does not require a P.E. certification. For any material changes to the application, please include a new certification statement by the responsible official (R.O.).

If you should have any questions or would like to discuss this item, you may contact me by telephone at 850/921-9532 or by e-mail at Scott.Sheplak@dep.state.fl.us.

Sincerely,



Scott M. Sheplak, P.E.
DEP - Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

copy to: Ms. Regina Embry, GRU: embryrg@gru.com
Mr. Gary P. Swanson, Plant Manager, DR: swansongp@gru.com
Mr. Thomas W. Davis, P.E., ECT: tdavis@ectinc.com
Mr. Chris Kirts, P.E., NED: Christopher.Kirts@dep.state.fl.us
Mr. Tom Cascio, DEP: Tom.Cascio@dep.state.fl.us

Sheplak, Scott

- file -

From: Livingston, Sylvia
Sent: Thursday, August 07, 2008 9:10 AM
To: 'alfordkc@gru.com'
Cc: 'embryrg@gru.com'; 'swansongp@gru.com'; 'tdavis@ectinc.com'; Kirts, Christopher; Cascio, Tom; Sheplak, Scott; Walker, Elizabeth (AIR)
Subject: J.R. Kelly Generating Station (001000-008-AV)
Attachments: 0010005-008-AV.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506



0010005-008-AV.p
df (543 KB)

Livingston, Sylvania

From: Alford, Karen C [ALFORDKC@gru.com]
Sent: Wednesday, August 13, 2008 5:12 PM
To: Livingston, Sylvania
Subject: RE: J.R. Kelly Generating Station (001000-008-AV)

Document Received. Thank you,

Karen Alford, GRU

Energy Supply

352-393-1730

-----Original Message-----

From: Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, August 13, 2008 10:01 AM
To: Alford, Karen C
Subject: FW: J.R. Kelly Generating Station (001000-008-AV)

Karen Alford,

I have not received your response to whether you've read this email. Please let me know by replying to this email verifying receipt of the attached document.

Thanks,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506

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.

8/13/2008

From: Livingston, Sylvia
Sent: Thursday, August 07, 2008 9:10 AM
To: 'alfordkc@gru.com'
Cc: 'embryrg@gru.com'; 'swansonp@gru.com'; 'tdavis@ectinc.com'; Kirts, Christopher; Cascio, Tom; Sheplak, Scott; Walker, Elizabeth (AIR)

Subject: J.R. Kelly Generating Station (001000-008-AV)

Dear Sir/Madam:

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506

<<0010005-008-AV.pdf>>

Livingston, Sylvia

From: Alford, Karen C [ALFORDKC@gru.com]
To: Livingston, Sylvia
Sent: Wednesday, August 13, 2008 10:40 AM
Subject: Read: FW: J.R. Kelly Generating Station (001000-008-AV)

Your message

To: ALFORDKC@gru.com
Subject:

was read on 8/13/2008 10:40 AM.

Livingston, Sylvania

From: Embry, Regina G [EMBRYRG@gru.com]
Sent: Monday, August 11, 2008 8:37 AM
To: Livingston, Sylvania
Subject: RE: J.R. Kelly Generating Station (001000-008-AV)

From: Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, August 07, 2008 9:10 AM
To: Alford, Karen C
Cc: Embry, Regina G; Swanson, Gary P; tdavis@ectinc.com; Kirts, Christopher; Cascio, Tom; Sheplak, Scott; Walker, Elizabeth (AIR)
Subject: J.R. Kelly Generating Station (001000-008-AV)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506

<<0010005-008-AV.pdf>>

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.

8/13/2008

Livingston, Sylvania

From: Swanson, Gary P [SWANSONGP@gru.com]
Sent: Thursday, August 07, 2008 9:31 AM
To: Livingston, Sylvania; Alford, Karen C
Cc: Embry, Regina G; tdavis@ectinc.com; Kirts, Christopher; Cascio, Tom; Sheplak, Scott; Walker, Elizabeth (AIR)
Subject: RE: J.R. Kelly Generating Station (001000-008-AV)

Received.

-O<

Gary P. Swanson
Plant Manager
Kelly Generating Station
Gainesville, FL 32601

352 334 3400 x 1705 ofc

352 317 4374 cell

-O<

-----Original Message-----

From: Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, August 07, 2008 9:10 AM
To: Alford, Karen C
Cc: Embry, Regina G; Swanson, Gary P; tdavis@ectinc.com; Kirts, Christopher; Cascio, Tom; Sheplak, Scott; Walker, Elizabeth (AIR)
Subject: J.R. Kelly Generating Station (001000-008-AV)

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Thank you,

8/13/2008

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506

<<0010005-008-AV.pdf>>

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Livingston, Sylvania

From: Tom Davis [tdavis@ectinc.com]
Sent: Thursday, August 07, 2008 10:06 AM
To: Livingston, Sylvania
Subject: RE: J.R. Kelly Generating Station (001000-008-AV)

From: Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, August 07, 2008 9:10 AM
To: alfordkc@gru.com
Cc: embryrg@gru.com; swansongp@gru.com; tdavis@ectinc.com; Kirts, Christopher; Cascio, Tom; Sheplak, Scott; Walker, Elizabeth \ (AIR\
Subject: J.R. Kelly Generating Station (001000-008-AV)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506

<<0010005-008-AV.pdf>>

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.

8/13/2008

Livingston, Sylvia

From: Kirts, Christopher
To: Livingston, Sylvia
Sent: Friday, August 08, 2008 7:05 AM
Subject: Read: J.R. Kelly Generating Station (001000-008-AV)

Your message

To: 'alfordkc@gru.com'
Cc: 'embryrg@gru.com'; 'swansongp@gru.com'; 'tdavis@ectinc.com'; Kirts, Christopher; Cascio, Tom; Sheplak, Scott; Walker, Elizabeth (AIR)
Subject: J.R. Kelly Generating Station (001000-008-AV)
Sent: 8/7/2008 9:10 AM

was read on 8/8/2008 7:05 AM.

Livingston, Sylvia

From: Cascio, Tom
To: Livingston, Sylvia
Sent: Thursday, August 07, 2008 9:21 AM
Subject: Read: J.R. Kelly Generating Station (001000-008-AV)

Your message

To: 'alfordkc@gru.com'
Cc: 'embryrg@gru.com'; 'swansongp@gru.com'; 'tdavis@ectinc.com'; Kirts, Christopher; Cascio, Tom; Sheplak, Scott; Walker, Elizabeth (AIR)
Subject: J.R. Kelly Generating Station (001000-008-AV)
Sent: 8/7/2008 9:10 AM

was read on 8/7/2008 9:21 AM.

Livingston, Sylvia

From: Sheplak, Scott
To: Livingston, Sylvia
Sent: Thursday, August 07, 2008 9:17 AM
Subject: Read: J.R. Kelly Generating Station (001000-008-AV)

Your message

To: 'alfordkc@gru.com'
Cc: 'embryrg@gru.com'; 'swansongp@gru.com'; 'tdavis@ectinc.com'; Kirts, Christopher; Cascio, Tom; Sheplak, Scott; Walker, Elizabeth (AIR)
Subject: J.R. Kelly Generating Station (001000-008-AV)
Sent: 8/7/2008 9:10 AM

was read on 8/7/2008 9:17 AM.

RECEIVED

STRATEGIC PLANNING

NOV 07 2008

November 5, 2008

BUREAU OF AIR REGULATION

via email and
certified mail

Scott Sheplak, P.E.
Bureau of Air Regulation Title V Section
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road, MS5505
Tallahassee, Florida 32399-2400

Re: J.R. Kelly Generating Station, Gainesville Regional Utilities (GRU)
Comments on Draft Permit Renewal 0010005-008-AV

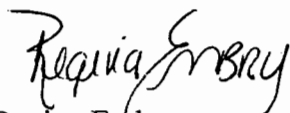
Dear Mr. Sheplak,

Below is recommendation for permit note to provide clarity to the intent of some draft permit language, as previously discussed.

"The only purpose for inclusion of specific condition B.18 for Emission Unit 010 is to provide direction for NOx excess emission exclusion from the 720-hour block average. Emissions beyond the allowed excess emission time frame are authorized; however, must be included in the 720-hour block average. Permit compliance is demonstrated by meeting the 720-hour block average NOx limit."

If you have any questions I may be reached at (352) 393-1299 or embryrg@gru.com.

Sincerely,



Regina Embry
Electric Utility Engineer

certified mail 7007 2680 0001 3421 0876

cc electronically: G. Swanson
J. Shaw

T. Davis, ECT
R. Klemans

W:\U0070\Regina\2008 JRK TitleV Permit draft\2008 JRK Title V draft permit comments to Scott Sheplak.doc