

# Northside Repowering Project

May, 1998

This newsletter is designed to inform the public of the progress of the Jacksonville Electric Authority's Northside Generating Station Repowering Project.

Visit our web site at [www.jea.com](http://www.jea.com)



JEA is upgrading two electrical generating units at the Northside Generating Station. This is a significant construction project which will cost \$463 million over a five year period and is scheduled to be completed by 2002. JEA is committed to continuous community involvement in the planning and implementation phases of the project. The purpose of this newsletter is to keep the public informed about the status of the project. It will be issued periodically as the project progresses and information becomes available.

## Northside Repowering Project Begins

During 1996, the JEA went through a comprehensive planning process to determine how best to meet the growing demand for electricity in Jacksonville. Jacksonville's growth will outstrip the capacity of the City's electric system by 2002 if new generating capacity isn't brought on line. Even considering other sources of power and demand reduction strategies, such as energy conservation programs, new generation will be needed.

In May 1997, the JEA Board decided to proceed with the option to upgrade Units 1 and 2 at the Northside Generating Station (Unit 2 has been out of service since 1983 and the boiler has been dismantled and removed). This option involves changing the type of fuel used at the two units from oil to petroleum coke and coal and using a new type of generating technology called circulating fluidized bed. This technology can burn a wide range of fuels and results in low air emissions. This option, referred to as the Northside Repowering Project, also includes additional equipment to control air emissions such as sulfur dioxide,

nitrogen oxides, and particulate matter.

JEA has made a commitment to the Jacksonville community to reduce annual emissions of sulfur dioxide, nitrogen oxides, and particulate matter from the Northside Station by at least 10 percent\*. Likewise, groundwater consumption for the facility will also be reduced by at least 10 percent.\*\* These reductions are to be accomplished while increasing the total annual energy output of the Northside Generating Station over 2.5 times.

Subsequent to the JEA Board decision to proceed with this project, the U.S. Department of Energy (DOE) selected JEA to participate in a demonstration project. The DOE plans to contribute nearly \$75 million toward the repowering project as part of the federal government's Clean Coal Technology Program. Before the money is provided to JEA, the DOE is required to evaluate the potential environmental impacts expected from the project. This process has several opportunities for public input.



\* (JEA will reduce by at least 10% the stack emissions of sulfur dioxide, nitrogen oxides, and particulate matter based on actual emissions as reported in the Annual Operating Report submitted to the Florida Department of Environmental Protection for 1994 and 1995 for Units 1 and 3. Unit 2 did not operate in 1994 or 1995.)

\*\* JEA will reduce groundwater withdrawal quantities by at least 10% based on the 1996 daily average withdrawal quantity.



## Department of Energy Initiates Environmental Impact Statement Process

JEA and DOE kicked off the federal review process for the Northside Repowering Project at a public meeting held at the Northside Station on December 3, 1997. Sponsored by DOE, this public scoping meeting provided the public an opportunity to discuss with DOE issues that should be addressed as part of the environmental impact review. Approximately 50 members of the public attended.

The Environmental Impact Statement (EIS) process includes an extensive review of potential impacts on the environment and the surrounding community. Issues that will be addressed in the EIS include air quality, water resources, aquatic ecology, infrastructure, land use, solid

waste, construction, floodplains, wetlands, socioeconomic impacts, and visual impacts.

A team of environmental experts working under the direction of DOE is developing the Draft EIS. The Draft EIS is expected to be complete and available for public review by October 1998. Once the Draft EIS is available, a 45-day public comment period will commence, during which a public hearing will be conducted. The final EIS is scheduled for completion by January 1999, and a written statement that documents DOE's decision whether to fund the project is expected to be issued in February 1999.

There are several opportunities for public input during the EIS

process. These consist of the public scoping period including the public scoping meeting, completed as of December 31, 1997, and the Draft EIS public comment period including the public hearing, expected to begin in October 1998.

Issues raised at the December 3<sup>rd</sup> public scoping meeting included transportation and noise impacts from train traffic through the Northside area and air emissions, including the potential for dioxin emissions. A copy of the scoping meeting transcript is in the Highlands Branch Library at 1826 Dunn Avenue in Jacksonville.



### JEA Consults with Neighbors and Interested Groups

In addition to the formal DOE process, the JEA has met with the following groups:

- Florida Department of Environmental Protection (both Tallahassee and the Northeast District)
- City of Jacksonville Environmental Protection Board Air Committee
- Florida Lung Association
- Northside Civic Association
- Heckscher Drive Community Club
- First Coast Manufacturers Association
- Sierra Club
- Jacksonville Certified Public Accountant Association
- Editorial Boards for Florida Times Union, WJXT TV-4, and Jacksonville Business Journal

JEA is committed to earning the public trust through participation in community affairs and is available to present and discuss this project with any community organization. If you are aware of an organization that may be interested in hearing more about the Northside Repowering Project, please call Susan Hughes at 665-6248.

## Technology and Fuel Choices Reflect Environmental and Cost Considerations

The technology chosen for the repowering project at Northside is circulating fluidized bed, burning petroleum coke and coal. Circulating fluidized bed technology is an advanced and proven technology which is very fuel flexible and results in low air emissions. For example, 90 percent of the sulfur dioxide emissions from fuel combustion will be eliminated in the boiler. JEA is planning to add a flue gas scrubbing system to capture additional emissions. Overall, more than 98 percent of the sulfur dioxide emissions will be removed.

Fuel is by far the largest single component in the cost of electricity. Given trends toward deregulation and greater competition in the electric utility industry, fuel price is of vital importance in the evaluation of new generation alternatives.

JEA considered a wide range of fuels in its planning process, including petroleum coke, coal, high sulfur fuel oil, natural gas, and low sulfur fuel oil. Petroleum coke, a byproduct of oil refining operations, is projected to have the lowest price over the long term of all the fuels evaluated. JEA completed a successful test burn

at the St. Johns River Power Park and has been burning petroleum coke, along with coal, at the Power Park since February, 1997. As a result of the agreement reached with the DOE, the repowering project will include a two-year demonstration of the circulating fluidized bed technology burning coal. Use of a blend of the two fuels is also being considered.



### Northside Repowering Project Contacts



#### Environmental Issues

*Mr. Bob Kappelmann*  
*Phone 665-6249*

#### Construction, Labor & Equipment Issues

*Mr. Reece Comer*  
*Phone 665-6312*

## JEA Begins Environmental Studies & Permitting

JEA is assembling the information required to apply for the various permits that will be needed for the Northside Repowering Project. As with the EIS, the permits ensure that impacts to the environment and the community are considered and minimized. They also specify how the project can be constructed and operated. Permits detailing potential impacts to the air, water, and land are required

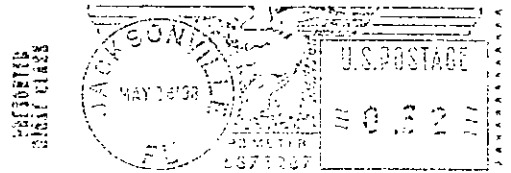
for a project of this type.

A draft of the air permit application will be completed in mid-summer 1998. JEA has committed to make this draft permit application available for review by individuals, community groups, and the local Environmental Protection Board prior to formal submittal.





**Environmental Health & Safety Department  
Tower 8  
Jacksonville Electric Authority  
21 West Church Street  
Jacksonville, FL 32202-3139**



Mr. Al Linero  
FDEP Division of Air Resources  
Management  
2600 Blair Stone Road  
MS 5505  
Tallahassee, Florida 32399-2400



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 Company name JEA  
 Shipper's name LOCATION: B. Gianazza, T-8  
 Address  
 21 W CHURCH ST  
 JACKSONVILLE FL  
 Zip code (required) 32202 Phone/fax/e-mail (904) 665-6247

**2 To (Recipient)**  
 Company name Florida Department of Environmental Protection  
 Attention Syed Arif  
 Delivery address Twin Towers Office Building  
 2600 Blair Stone Road  
 Tallahassee, Florida  
 Zip/Postcode (required) 32399-2400 Phone/fax/e-mail (904) 488-1344

**3 Shipment details**  
 Domestic Services  USA OVERNIGHT  
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 WORLDWIDE PRIORITY EXPRESS  
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 APM  2nd class  Other  
 Special Services  SATURDAY DELIVERY  
 POD  
 Payment Options not all options available to all countries  
 Shipper's account  
 Recipient  Third party  
 Acct. No. [Barcode]  
 Full description of contents: Permitting Corr.  
 International non document shipments only  
 Attach original and four copies of a Commercial Invoice  
 Declared value for customs (in US \$) Expon license No./Symbol (if applicable)  
 Harmonized Sched B No (if applicable) Type of export  Permanent  Temporary  Repair/Return  
 Shipper's EIN/SSN These circumstances, technology or software were exported from the United States in accordance with the export administration regulations. Duplicate copies to U.S. law prohibited.  
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 Recipient  Shipper  Other

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 Signature (required) Patricia O. English Date 04/28/99

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WAIVER OF 90 DAY TIME LIMIT  
UNDER SECTIONS 120.60(1), (3) AND 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No. PSD-FL-265(C), JEA, Northside Units 1 & 2  
Repowering Project

Applicant's Name: JEA  
21 West Church Street  
Jacksonville, FL 32202

With regard to the above referenced application, the applicant hereby with full knowledge and understanding of applicant's rights under Sections 120.60(1), (3) and 403.0876, Florida Statutes, waives the right to have the application finally approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed by law. Representatives of the Department have stated that the "proposed" action to issue or deny the request permit (Intent, Public Notice of Intent, and Proposed Permit) shall occur 16 days prior to the 90<sup>th</sup> day. Said waiver is made freely and voluntarily by the applicant, with full knowledge, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Protection.

This waiver for final issuance or denial of the requested permit shall expire on the 30<sup>th</sup> day of May, 1999, and is made with the assumption that the Department's proposal to issue or deny the permit will be made by May 14, 1999 (Intent, Public Notice of Intent, and Proposed Permit).

The undersigned is authorized to make this waiver on behalf of the applicant.

Dated: April 27, 1999



Signature

Walter P. Bussells, Managing Director  
and Chief Executive Officer of JEA

**RECEIVED**

'APR 29 1999

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AIR REGULATION

RECEIVED

MAY 25 1999

BUREAU OF AIR REGULATION

FLORIDA PUBLISHING COMPANY
Publisher
JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA
COUNTY OF DUVAL

Before the undersigned authority personally appeared

Steven L. Smith who on oath says that he is

Legal Advertising Representative of The Florida Times-Union,

a daily newspaper published at Jacksonville in Duval County, Florida; that the

attached copy of advertisement, being a Legal Advertisement

in the matter of Public Notice of Intent to Issue PSD Permit

in the Court,

was published in THE FLORIDA TIMES-UNION in the issues of

May 18, 1999

Affiant further says that the said The Florida Times-Union is a newspaper published at Jacksonville, in said Duval County, Florida, and that the said newspaper has heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me this 21st day of May, 1999

Notary Public in and for the State of Florida
Commission # 00547806
Expires Jun. 1, 2000
Bonded Thru Atlantic Bonding Co., Inc.

Signature of Steven L. Smith

PUBLIC NOTICE OF INTENT TO ISSUE PSD PERMIT
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 0010045-003-AC (PSD-FL-265)
Duval County, Florida

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit under the requirements for the Prevention of Significant Deterioration of Air Quality (PSD permit) to JEA. The permit is to construct two new coal- and petroleum coke-fired circulating fluidized bed (CFB) boilers and associated ancillary equipment and processes at the existing Northside Generating Station in Duval County, Florida. These new boilers will be connected to the existing steam turbines for Units 1 and 2 (295.5 MW each). A new, dual-shaft 495-foot stack will be added to the facility for Repowered Units 1 and 2, along with solid fuel delivery and storage facilities, limestone preparation and storage facilities (including three limestone dryers), a lime silo, aqueous ammonia storage, polishing scrubbers, electrostatic precipitators or fabric filters (baghouses), and ash removal and storage facilities. A Best Available Control Technology (BACT) determination was required for particulate matter (TSP/PM10), oxides of nitrogen (NOx), volatile organic compounds (VOC), carbon monoxide (CO), hydrogen fluoride (HF), and mercury (Hg) pursuant to Rule 62-212.400, F.A.C.

The applicant's name and address are JEA, 21 West Church Street, Jacksonville, Florida 32202-3105. The Northside Generating Station is located at 4377 Heckscher Drive, Jacksonville, Duval County, Florida.

Particulate matter (TSP/PM10) emissions from Units 1 and 2 will be controlled by either fabric filters (baghouses) or electrostatic precipitators. Oxides of nitrogen emissions from Units 1 and 2 will be controlled through the use of a selective non-catalytic reduction (SNCR) system. Carbon monoxide and volatile organic compound emissions from Units 1 and 2 will be controlled through good combustion practices, and hydrogen fluoride and mercury emissions will be controlled the use of air quality control systems for particulate matter and sulfur dioxide. The limestone dryer emissions will be controlled through fabric filters (baghouses), low NOx burners, good combustion practices, and the use of low sulfur fuels. The materials handling operations will utilize wet suppression techniques, partial and total enclosures, conditioned materials, and fabric filters (baghouses), as appropriate, to control particulate matter (TSP/PM10) emissions.

JEA has requested emission caps on Units 1 and 2 as well as existing Unit 3 for sulfur dioxides, oxides of nitrogen, and particulate matter (TSP) to ensure a ten percent decrease below historical (1994-1999) annual emission levels once Units 1 and 2 are repowered. Therefore, in the future, emissions of these three parameters from Units 1, 2 and 3 combined will be less than before the repowering while electrical output from Units 1, 2 and 3 will be about two and a half times greater than historical levels as a result of repowering.

The net emissions increases due to the repowering of Units 1 and 2 for PSD applicability purposes are summarized below (in tons per year).

Table with 3 columns: Pollutant, Net Emissions Increase, PSD Significant Emission Rate. Rows include TSP, PM10, NOx, CO, VOCs, HF, and Hg.

An air quality impact analysis was conducted. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards. The maximum predicted PSD Class II increments of NO2 and PM10 consumed by all sources in the area, including this project, will be as follows:

Table with 4 columns: Averaging Time, Allowable Increment (u/m3), Increment Consumed (u/m3), Percent Consumed. Rows include PM10 24-HOUR and Annual, and NO2 Annual.

Maximum predicted impacts are less than the applicable PSD Class I significant impact levels at the Oklawaha National Wilderness Area for PM10 and NO2.

The Department will accept written comments and requests for a public meeting concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of this "Public Notice of Intent to Issue PSD permit." Written comments and requests for a public meeting should be provided to the Department's Bureau of Air Regulation 2600 Blair Stone Road, Mail Station # 5305, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station # 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.603 of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.603(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of the public notice. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, Florida Statutes, or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner, the name, address, and telephone of the petitioner's representative, if any which shall be the address for service purposes during the course of the proceedings; and explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner receives notice of the agency action or proposed action; (d) A statement of all disputed issues of material facts. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; and (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the petition taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
Department of Environmental Protection, Department of Environmental Protection
Bureau of Air Regulation, Northeast District Office
111 South Magnolia Drive, Suite 4, 7825 Baymeadows Way, Suite 2008
Tallahassee, Florida 32301, Jacksonville, Florida 32256-7590
Telephone: 850/488-1344, Telephone: 904/448-4300
Fax: 850/922-6979, Fax: 904/448-4366
Jacksonville Regulatory and Environmental Service Department
117 West Duval Street, Suite 225
Jacksonville, Florida 32202
Telephone: 904-630-3484
Fax: 904-630-3638

The complete project file includes the Draft Permit, the application and the information submitted by the responsible official, exclusive of confidential records under Section 402.111, Florida Statute. Interested persons may contact the New Resource Review Section at 111 South Magnolia Drive, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

cc: Syed Arif
MED
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Z 333 618 147

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0310045-003-AC	
PSD-FI-265	

PS Form 3800, April 1995

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**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
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I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
Walter Bussells  
JEA  
21 W. Church St.  
Jacksonville, FL  
32202-3139

4a. Article Number  
Z333 618 147

4b. Service Type  
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5. Received By: (Print Name)

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6. Signature: (Addressee or Agent)  
X [Signature]

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

Thank you for using Return Receipt Service.





Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

May 12, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Walter P. Bussells, Managing Director and CEO  
JEA  
21 West Church Street  
Jacksonville, Florida 32202-3139

Re: DEP File No. 0310045-003-AC (PSD-FL-265)  
JEA Northside Generating Station  
Northside Units 1 and 2 Repowering Project

Dear Mr. Bussells:

Enclosed is one copy of the Draft Permit, Technical Evaluation and Preliminary Determination, for the referenced project in Duval County. The Department's Intent to Issue Permit and the "PUBLIC NOTICE OF INTENT TO ISSUE" are also included.

The "Public Notice of Intent to Issue Permit" must be published as soon as possible in a newspaper of general circulation in the area affected. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section, at the above letterhead address. If you have any questions, please call Syed Arif at 850/921-9528.

Sincerely,

C. H. Fancy, P.E., Chief,  
Bureau of Air Regulation

CHF/sa

Enclosures

In the Matter of an  
Application for Permit by:

Mr. Walter P. Bussells,  
Managing Director and CEO  
JEA  
21 West Church Street  
Jacksonville, FL 32202

DEP File No. 0310045-003-AC  
DRAFT Permit No. PSD-FL-265  
Northside Generating Station  
Repowering of Units 1 & 2  
Duval County

### INTENT TO ISSUE PSD PERMIT

The Florida Department of Environmental Protection (Department) gives notice of its intent to issue a permit under the requirements for the Prevention of Significant Deterioration (PSD) of Air Quality (copy of Draft PSD Permit attached) for the proposed project, detailed in the application specified above and the attached Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, JEA, applied on February 15, 1999, to the Department for a PSD permit to install two new coal- and petroleum coke-fired circulating fluidized bed (CFB) boilers to be connected to the existing steam turbines for Northside Generating Station Units 1 and 2 (297.5 MW each), along with associated ancillary equipment and processes including a new dual-flued, 495-foot stack, solid fuel delivery and storage facilities, limestone preparation and storage facilities (including three limestone dryers), a lime silo, aqueous ammonia storage, polishing scrubbers, electrostatic precipitators or fabric filters (baghouses), and ash removal and storage facilities.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that a PSD permit and a determination of Best Available Control Technology for the control of particulate matter (TSP/PM10), oxides of nitrogen, carbon monoxide, volatile organic compounds, hydrogen fluoride, and mercury is required to conduct the work.

The Department intends to issue this PSD permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emissions units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue PSD Permit." The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one of significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below.

Is your RETURN ADDRESS completed on the reverse side?

- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

1.  Addressee's Address
2.  Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to:  
 Robert Kapplermann, PE.  
 Manager, Env. Affairs  
 Jacksonville Electric A.  
 21 W Church St.  
 Jacksonville, FL 32202-3139

4a. Article Number  
 P 265 659 290

- 4b. Service Type
- Registered  Certified
- Express Mail  Insured
- Return Receipt for Merchandise  COD

7. Date of Delivery  
 2-12-98

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)  
 X *[Signature]*

PS Form 3811, December 1994

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**Receipt for Certified Mail**  
 No Insurance Coverage Provided.  
 Do not use for International Mail (See reverse)

Sent to	Robert Kapplermann
Street & Number	JEA
Post Office, State, & ZIP Code	JAX, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	2-9-98

PS Form 3800 April 1995



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February 6, 1998

Robert Kappleman, P.E.  
Manager, Environmental Affairs  
Jacksonville Electric Authority  
21 West Church Street  
Jacksonville, FL 32202-3139

Dear Mr. Kappleman:

The Department has reviewed your letter dated January 7 regarding PSD applicability to the Northside Repowering Project. A letter from the Department of Energy is expected in the near future which describes the repowering of Unit 2 as a Clean Coal Technology Demonstration Project. Based on this information, the Department concludes that Unit 2 qualifies for the exemption contained in Rule 62-212.400(2)(a)3, F.A.C. provided that emissions from repowered Unit 2 do not result in an increase in the potential to emit of any regulated air pollutant.

The letter also describes the method for determining baseline emissions from Unit 1 for the period of 1994 through 1995. The Department concludes that this baseline period is acceptable. The baseline emissions estimates based on continuous monitoring data, stack test data, and AP-42 emission factors is acceptable with one exception. Baseline emissions for particulate matter shall be based on the stack test data for the baseline period since these emission rates are specific to Unit 1. Note that December 1993 test data shall be used for the 1994 baseline year since this test apparently satisfied the test requirement in 62-297.310(7)4, F.A.C. which requires a stack test during each federal fiscal year.

Mr. Kappleman, P.E.  
February 6, 1998  
Page 2 of 2

If you have further questions, please contact me at  
(850) 921-8986 or by using the following e-mail address:  
costello\_m@dep.state.fl.us.

Sincerely,



Martin Costello, P.E.  
Bureau of Air Regulation

CC: Gregg Worley, EPA  
Steve Pace, RESD