

EV 991013

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DEPARTMENT OF
ENVIRONMENTAL PROTECTION



October 13, 1999

99 OCT 20 PM 12: 56

BUREAU OF PETROLEUM
STORAGE SYSTEMS
DOCUMENT MANAGEMENT
CENTER

Mr. Wayne Tutt
Regulatory and Environmental Services Department
Air and Water Quality Division
City Hall at St. James Building
117 W. Duval St., Suite 225
Jacksonville, FL 32202

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OCT 21 1999

RE: St. Johns River Power Park (SJRPP)
Permit No. 0310045-001-AV
U#2 Shutdown Emissions Report

BUREAU OF AIR REGULATION

Dear Mr. Tutt.

Pursuant to discussions with your person, below is listed the excess emissions for the SJRPP Unit #2 shutdown event of October 11 & 12, 1999. As we discussed, these emissions are representative of a coal-fired unit shutdown based upon required operational activities.

| Startup | | H = Hot (<24 hrs) | | SNO = Short Notice Outage | | Exc. Time in minutes | | |
|----------|-------------------------|------------------------|------|---------------------------|------|------------------------------------|----|-------------------------------|
| Key | | W = Warm (>24<120 hrs) | | LTO = Long Term Outage | | Value is % OP OR lbs/MMBtu SO2/NOx | | |
| | | C = Cold (>120 hrs) | | | | BOLD = Daily Duration | | |
| DATE | EVENT/ PARAMETER | FIRE TIME IN OUT | | EVENT TIME START STOP | | PARAMETER EXC. TIME VALUE | | COMMENTS |
| 10/11/99 | <u>Shutdown</u> Opacity | | | 1824 | 1824 | 6 | 29 | |
| | | | | 1836 | 1848 | 18 | 39 | |
| | | | | 1942 | 1954 | 18 | 30 | |
| 10/12/99 | | | 0416 | | | | | OP 42 minutes OP 0 minutes |

These excess emissions shall be included on the 40 CFR Part 60, Subpart Da, Air Emissions Data Assessment Report for this facility at the end of the quarter.

Please contact me at (904) 665-8797 if you have any questions or comments.

Sincerely,

Mark K. Loechel
Environmental Production Assurance Leader

xc: S. Pace, RESD
S. Arif, FDEP ✓
E. Frey, FDEP
H. Oven, FDEP

EV 990916

September 16, 1999

BUREAU OF AIR REGULATION

SEP 21 1999

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BUREAU OF AIR REGULATION

SEP 21 1999

RECEIVED



Ms. Dana L. Brown
City of Jacksonville
Regulatory and Environmental Services Department (RES D)
117 West Duval Street, Suite 225
Jacksonville, FL 32202

RE: Cease and Desist Citation #AP-99-17
JEA/St. Johns River Power Park (SJRPP)
CO/H₂SO₄ Testing Notification Failure
DEP Permit No. 031-0045-001-AV
Specific Condition No. D.50(a)9

Dear Ms. Brown,

Pursuant to our meeting of September 7, 1999, the following is offered as an explanation/apology for the actions that prompted the above listed citation issuance.

Pursuant to permit conditions, semi-annual testing for CO/H₂SO₄ was required for the first two years of petcoke burn operations, which was completed in October, 1998. The data was compiled, assessed, and submitted for agency review and concurrence that current rates of emissions for the two species were not statistically above past actuals, on February 4, 1999. This report was additionally hand delivered on March 18, 1999, to FDEP officials in Tallahassee. On April 22, 1999, this report was faxed to FDEP officials in Tallahassee, at their request, due to misplacement or other factors not within the control of JEA/SJRPP personnel.

The semi-annual testing schedule arrangements (June, 1999) were maintained in order to ensure compliance in the event of agency disagreement with its findings. Numerous phone calls and e-mails to FDEP officials were also performed to ensure review and assessment would be completed before the adopted testing schedule (June, October) would be triggered. It was the intent to cancel the testing once the relief from testing was granted.

When this appeared that this review and assessment would not be completed before the prearranged testing schedule trigger, testing was performed on June 2 and 3, 1999, for the above listed parameters. On June 2, 1999, Unit #1 parameters were tested. On the morning of June 3, 1999, discussions revealed there had been an oversight to perform the required agency test notification. At this time, Jeff Winter, RESD, was contacted to inform of the testing being performed at SJRPP. Unit #2 testing was continued and completed on June 3, 1999. This seemed to be the correct action to take as the testing personnel were already on site, deviation from the testing schedule would not occur, and generated data would be available for agency review.

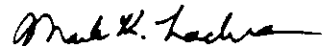
Ms. Dana L. Brown
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On June 3, 1999, FDEP personnel notified SJRPP that the review had still not been performed, and requested additional testing to be performed while the report was being reviewed, with an anticipated completion date by the end of the month. I received a phone call from FDEP personnel on August 9, 1999, accepting the report, with additional testing requested for the October schedule (annual compliance), as the June testing was "prior" to his review, and not formally included in the required data submittal (> two years). We stated we would be glad to perform the testing as requested to satisfy the annual requirement.

Thoughts were concentrated on the fact that the testing would not be required after agency review of the submitted materials, and that annual testing would then occur in October, 1999. SJRPP has always notified all required agencies in an expeditious manner pursuant to all required notifications. We regret this oversight based upon unique and unusual circumstances, and will ensure that all future notifications are conducted.

Please contact me at (904) 665-8797 if you have any questions.

Sincerely,



Mark K. Loechelt
Env. Production Assurance Leader

Xc: S. Arif, FDEP
H. Oven, FDEP