

EV 990810

August 10, 1999

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BUREAU OF AIR REGULATION



Mr. Syed Arif, P.E.
Florida Dept. Of Env. Protection
Air Resources Management
Magnolia Park Courtyard, Rm. 123
Tallahassee, FL 32301

RE: JEA/St. Johns River Power Park (SJRPP)
PSD-FL-010(B)
Conditions of Certification PA 81-13
CO (Carbon Monoxide) and H₂SO₄ (Sulfuric Acid) Mist
Semi-Annual Compliance Testing Completion

Dear Mr. Arif,

Pursuant to your review of our past two years of semi-annual stack testing data for CO/H₂SO₄ mist during petroleum coke co-firing with coal, as reviewed and prepared by Mr. Kennard F. Kosky, P.E., of Golder Associates, Inc. (see enclosure), we appreciate your concurrence during our telephone conversation of August 9, 1999, that SJRPP has successfully fulfilled the permit conditions of PSD Conditions 3.B. and C., and Specific Conditions I.A.2.h. and i., directing that semi-annual performance testing shall be performed, demonstrating that the change in operations did not result in significant increases in CO or H₂SO₄ mist emissions to the environment.

Co-firing with petroleum coke began in April, 1997, with the first test performed in June, 1997, with additional testing performed in 11/97, 5/98, 10/98, and 6/99. Your suggestion of performing the tests again during our scheduled RATA in October, 1999, shall be performed. This test shall fulfill the first year annual requirement as specified in PSD 3.B. and Specific Condition I.A.2.h for CO, directing that an additional three years of annual testing be performed, with the permitted annual requirements fulfilled in the year 2001. At this time, an additional compliance test report shall be submitted to your person for review. No additional H₂SO₄ mist testing is required pursuant to the permits.

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

Sincerely,

Mark K. Loechelt
Env. Production Assurance Leader

Enclosure: CO/H₂SO₄ Compliance Certification 02/04/99

xc: H. Oven, FDEP
E. Frey, FDEP
S. Pace, RESD
W. Tutt, RESD

cc: File - v