

ENV 990430

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April 30, 1999

Mr. Syed Arif
Florida Department of Environmental Protection
Division of Air Resources Management - MS 5500
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

RE: St. Johns River Power Park (SJRPP)
Jacksonville Electric Authority (JEA)
Petroleum Coke - 100,000 lbs/hr
Withdrawal of Request
PSD - FL - 010(B)

Dear Mr. Arif:

SJRPP submitted a request on December 03, 1998 for the 100,000 lbs/hr utilization of petroleum coke, at the above referenced facility, to be defined as a 30 day rolling average value in order to maintain the co-firing of a 20% petroleum coke and 80% coal blend. On February 18, 1999 SJRPP requested a waiver of the 90 day time limit for issuance of permit under Sections 120.60(1) and 403.0876, Florida Statutes in order for a continuation of the review process.

Pursuant to our recent conversations, SJRPP is withdrawing the request for a 30 day rolling average.

Thank you for your assistance and please contact me at (904)665-8729 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Jay Worley". The signature is stylized and written over a printed name and title.

Jay Worley
Group Leader Process/Regulatory

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

EV 990317

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March 17, 1999

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DIVISION OF AIR
RESOURCES MANAGEMENT

Mr. H. W. Rhodes, Director
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: JEA - St. Johns River Power Park (SJRPP)
St. Johns River Coal Terminal (SJRCT)
PSD Permit No. PSD-FL-010(B)
Limestone Handling Performance Test

Dear Mr. Smith,

Pursuant to the performance testing requirements of 40 CFR Part 60, Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants, please find enclosed the performance test results performed on February 6, 1999, for the above referenced facility.

As can be observed from the test data, no emissions were observed during the testing. SJRPP/SJRCT present as-built system has provided adequate assurance of compliance for the handling of this new material.

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

Sincerely,

Mark K. Loechelt
Environmental Section Leader

Enclosure: SJRPP/SJRCT Subpart OOO Performance Test Data

xc: W. Smith, EPA
H. Oven, FDEP
S. Arif, FDEP
E. Frey, FDEP
S. Pace, RESD

ST. JOHNS RIVER POWER PARK (SJRPP)
ST. JOHNS RIVER COAL TERMINAL (SJRCT)
LIMESTONE SHIP UNLOADING OPERATIONS
PERFORMANCE TEST RESULTS
FEBRUARY 6, 1999

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INTRODUCTION

St. Johns River Power Park (SJRPP) is a 2 unit, coal/petroleum coke fired electric generation facility with rail and ship unloading capabilities with fuel and limestone handling support operations. The ship unloading facility, St. Johns River Coal Terminal (SJRCT) consists of waterborne coal, petroleum coke and recently limestone unloading operations. SJRCT and SJRPP fuel handling system is comprised of a dock and ship unloader, approximately 3 miles of a totally enclosed overland/water conveyance system., a stacker/reclaimer and associated storage piles to facilitate material movement to the facility.

SJRPP/SJRCT requested approval from the Florida Department of Environmental Protection and has been approved for the receipt of limestone via the SJRCT terminal on the St. Johns River (see enclosure). The first shipment of limestone received was on November 08, 1998, however, the maximum production rate was not achieved at that time.

The visible emissions observation performance testing was conducted on the February 06, 1999 shipment of limestone received. This performance test satisfies the 180 day test requirement from the date of initial operation.

SUMMARY OF TEST RESULTS

The following table presents the results of the Compliance Emissions Testing performed on February 6, 1999, for the ship unloading and temporary limestone pile operations:

VISIBLE EMISSIONS

<u>ID #</u>	<u>Equipment/Activity</u>	<u>Test Date</u>	<u>Time</u>	<u>Avg. % Opacity</u>
3	Ship Unloader Hopper	02/06/99	1000 - 1100	0.00 %
6	Transfer Point: Hopper Belt to Conveyor CT1	02/06/99	1000 - 1100	0.00 %
7	Conveyor CT1	02/06/99	1000 - 1100	0.00 %
8	Transfer Point: Conveyor Ct1 to Conveyor CT2	02/06/99	1150 - 1250	0.00 %
10	Transfer Point: Conveyor CT2 to Conveyor CT3	02/06/99	1310 - 1410	0.00 %
12	Transfer Point: Conveyor CT3 to Conveyor CT4	02/06/99	1430 - 1530	0.00 %
13	Conveyor CT4	02/06/99	0935 - 1035	0.00 %
16	Transfer Point: Conveyor CT-4 to Trailing Conveyor S1	02/06/99	0935 - 1035	0.00 %
17	Trailing Conveyor S1	02/06/99	1155 - 1255	0.00 %
18	Transfer Point: Trailing Conveyor S1 to Boom Conveyor S2	02/06/99	1155 - 1255	0.00 %
19	Boom Conveyor S2	02/06/99	1155 - 1255	0.00 %
20	Boom Conveyor S2 to Temporary Storage Pile	02/06/99	1155 - 1255	0.00 %
023j	Temporary Storage Pile Loader Grab	02/06/99	1045 -1145	0.00 %
023j	Loader Grab to Dump Truck	02/06/99	1045- 1145	0.00 %

ENV 990218

CERTIFIED MAIL

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February, 18, 1999

Mr. Syed Arif
Florida Department of Environmental Protection
Division of Air Resources Management - MS 5500
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

RE: St. Johns River Power Park (SJRPP)
Jacksonville Electric Authority (JEA)
Petroleum Coke - 100,000 lbs/hr
Request For Waiver
PSD - FL - 010(B)

Dear Mr. Arif:

The attached December 03, 1998 letter (Attachment A) was submitted requesting that the 100,000 lbs/hr utilization of petroleum coke, at the above referenced facility, be defined as a 30 day rolling average value in order to maintain the co-firing of a 20% petroleum coke and 80% coal blend. Pursuant to our 02/11/99 telephone conversation, SJRPP requests a waiver of the 90 day time limit for issuance of permit under Sections 120.60(1) and 403.0876, Florida Statutes in order for a continuation of the review process. Please find attached (Attachment B) the completed waiver document. In addition, I will be contacting you to set up a meeting to discuss the 100,000 lbs/hr. utilization of petroleum coke.

Please contact me at (904)665-8729 if you have any questions regarding this request.

Sincerely,

Jay Worley
Group Leader Process/Regulatory

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

ATTACHMENT A

ENV 981203

December 03, 1998

Mr. Syed Arif
Florida Department of Environmental Protection
Division of Air Resources Management - MS 5500
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400



RE: St. Johns River Power Park (SJRPP)
Jacksonville Electric Authority (JEA)
Petroleum Coke - 100,000 lbs/hr
PSD - FL - 010(B)

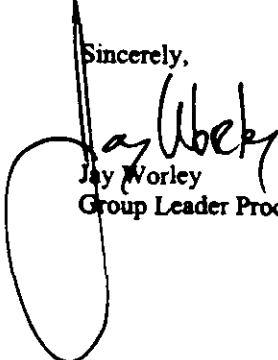
Dear Mr. Arif:

The Permit Amendment to the Prevention of Significant Deterioration approval [PSD-FL-010(B)] for St. Johns River Power Park (SJRPP) provided for up to 20 percent by weight of petroleum coke to be co-fired with coal. An integral part of this approval was meeting the New Source Performance Standards (NSPS) Subpart Da for sulfur dioxide. The emissions limits expressed in Specific Condition 2.A. were based on a long-term baseline SO₂ emission rate of 0.4 lb/mmBtu and established the petroleum coke portion of the emission limit for co-firing up to 20 percent by weight of petroleum coke with coal. For coal (i.e., 80 percent of the co-fired mixture), the emissions rate continued to follow the requirements of the NSPS. Compliance with the SO₂ emission limit was based on the NSPS averaging time which is a 30-day rolling average pursuant to Sections 60.43a and 60.46a of Subpart Da. The emission limits for SO₂, as well as those for particulate matter, nitrogen oxides, carbon monoxide and sulfuric acid mist, were established to insure that annual emissions would not increase as a result of co-firing petroleum coke with coal. The use of the annual averaging time in establishing significant increase in emissions is fundamental to the PSD approval. A shorter averaging time for SO₂, such as the 30-day rolling average, would assure the Department that the annual emissions would not increase. Indeed, the limits established would effectively lower the potential SO₂ emissions when co-firing petroleum coke with coal.

Specific Condition 2.B. limits the petroleum coke and coal blends to 20 percent pet coke by weight and includes a 100,000 lb/hr limit for petroleum coke. While no averaging time is expressed for the lb/hr limit, it is the opinion of SJRPP that this should be based on a 30-day rolling average similar to Specific Condition 2.A. of the permit amendment. This would limit the percentage of petroleum coke that can be co-fired with coal to a shorter averaging time (i.e., 30-day rolling average) than the basis of the baseline emissions established for SO₂ (i.e., annual). It would also provide the Department the reasonable assurance that annual emissions would not be exceeded pursuant to the PSD regulations. SJRPP requests that the 100,000 lbs/hr be defined as a 30 day rolling average value in order to maintain the co-firing of a 20% petroleum coke and 80% coal blend.

Please contact me at (904)665-8729 if you have any questions regarding this request.

Sincerely,


Jay Worley
Group Leader Process/Regulatory

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