



October 18, 1996

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AIR REGULATION

Mr. Hamilton S. Oven, Jr.
Siting Coordinator
Department of Environmental Protection
2600 Blair Stone Road, MS-48
Tallahassee, FL 32399-2400

RE: St. Johns River Power Park
Final Order Modifying Conditions of Certification
Power Plant Siting No. PA-81-13H

Dear Mr. Oven:

Thank you for your timely response in finalizing the above-referenced order modifying the conditions of site certification for the St. Johns River Power Park. Unfortunately, this October 8, 1996, order appears to include a typographical error. The revised limit for sulfur dioxide emissions that applies when petroleum coke is cofired with coal is written as a formula, and brackets that effectively alter that formula have been added, apparently inadvertently (see excerpt attached). These brackets were not included in the formula originally proposed by Jacksonville Electric Authority or in the corresponding Prevention of Significant Deterioration permit amendment issued by the Department of Environmental Protection on October 14, 1996 (excerpt attached). As stated in the permit amendment, the formula should read:

$$\text{SO}_2 \text{ (lb/MMBtu)} = (0.1653 \times C \times S - 0.4 \times C + 40) \times 1/100.$$

In the final order, brackets have been included so that the formula reads:

$$\text{SO}_2 \text{ (lb/MMBtu)} = (0.1653 \times C \times S - 0.4 \times [C + 40]) \times 1/100.$$

After discussing this matter with representatives from the Department's Division of Air Resources Management, it appears that the inclusion of the brackets in the formula was an inadvertent error and that there was no intent to change the formula as proposed by Jacksonville Electric Authority. To assist the Department in correcting this apparent error, we have prepared an Order Correcting Scrivener's Error, and a copy is attached (along with a version on computer disk-WordPerfect format).

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We would like to thank you for your continued cooperation in this matter, and we would appreciate your help in correcting the apparent typographical error in the Final Order. Please contact Jay Worley at (904) 751-7729 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Breitmoser". The signature is written in a cursive style and is enclosed within a hand-drawn oval.

Richard Breitmoser
Vice President
Environmental Health & Safety Group

cc: Al Linero, DEP
Penny Rolleston, DEP
Jay Worley, SJRPP
Angela Morrison, HGSS

Final Determination

Jacksonville Electric Authority
St. Johns River Power Park
Units 1 & 2
Jacksonville, Florida
Duval County

Coal and Petroleum Coke Co-Firing
Electric Utility Steam Generating Units
Solid and Liquid Fuel - Fired Boilers
660 MW/Unit

Permit No. PSD-FL-010(B)

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

October 11, 1996

Final Determination
Jacksonville Electric Authority
St. Johns River Power Park
PSD-FL-010(B)

The Technical Evaluation and Preliminary Determination for the permit amendment to allow firing of a 80% bituminous coal/20% petroleum coke blend (by weight) at the existing St. Johns River Power Park Units 1 & 2 in Jacksonville, Duval County, Florida was distributed on May 1, 1996. The Notice of Intent to Issue was published in the Florida Times Union on May 6, 1996. Copies of the amendment were available for public inspection at the Department offices in Jacksonville and Tallahassee.

No comments were submitted by the National Park Service or the U.S. Environmental Protection Agency. A petition was filed by the Sierra Club, Northeast Florida on May 20, 1996. This petition was dismissed by the Department. An amended petition was resubmitted on June 21, 1996. After successful negotiations between the petitioner and the Company (DEP was not a party), a separate agreement was signed on September 27, 1996, and the petition was dismissed on October 4, 1996.

The final action of the Department will be to issue the permit amendment as proposed.

Mr. Richard Breitmoser
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iii. When coals with a sulfur content greater than 3.63 percent are co-fired with petroleum coke, the SO₂ emissions shall not exceed the following formula:

$$\text{SO}_2 \text{ (lb/MMBtu)} = (0.1653 \times C \times S - 0.4 \times C + 40) \times 1/100$$

Where: C = percent of coal co-fired on a heat input basis
S = weight percent sulfur in the coal

iv. The maximum SO₂ emission rate when firing petroleum coke and coal shall not exceed 0.676 lb/MMBtu.

v. Compliance with the SO₂ emissions limit shall be based on a 30-day rolling average for those days when petroleum coke is fired. Any use of petroleum coke during a 24-hour period shall be considered 1 day of the 30-day rolling average. The 30-day rolling average shall be calculated according to the New Source Performance Standards (NSPS) codified in 40 CFR 60 Subpart Da, except as noted above.

Condition 2. B. (new)

The petroleum coke-coal blends shall be limited to a maximum of 20 percent petroleum coke, by weight. The maximum weight of the petroleum coke burned shall not exceed 100,000 lb/hr. The maximum sulfur content of the petroleum coke-coal blend shall not exceed 4.00 percent, by weight.

Condition 3. A. (new)

The applicant shall maintain and submit to the Department on an annual basis for a period of five years from the date the unit is initially co-fired with petroleum coke, information demonstrating in accordance with 40 CFR 52.21(b)(21)(v) and 40 CFR 52.21(b)(33) that the operational changes did not result in emissions increases of nitrogen oxides and particulate matter.

Condition 3. B. (new)

The applicant shall maintain and submit to the Department on a semiannual basis for a period of two years from the date the unit is initially co-fired with petroleum coke, and then on an annual basis (if the first two years of data show no significant increase in carbon monoxide emissions) for an additional three years, information demonstrating that the operational changes did not

c. When coals with a sulfur content greater than 3.63 percent are co-fired with petroleum coke, the SO₂ emission limitation shall be established by the following formula:

$$\text{SO}_2 \text{ (lb/MMBtu)} = (0.1653 \times C \times S - 0.4 \times [C + 40]) \times 1/100$$

where: C = percent of coal co-fired on a heat input basis

S = weight percent sulfur in the coal

d. The maximum SO₂ emission rate when firing petroleum coke and coal shall not exceed 0.676 lb/MMBtu.

e. Compliance with the SO₂ emissions limit shall be based on a 30-day rolling average for those days when petroleum coke is fired. Any use of petroleum coke during a 24-hour period shall be considered one day of the 30-day rolling average. The 30-day rolling average shall be calculated according to the New Source Performance Standards (NSPS) codified in 40 CFR 60 Subpart Da, except as noted above.

f. The petroleum coke blends shall be limited to a maximum of 20 percent petroleum coke by weight. The maximum weight of petroleum coke burned shall not exceed 100,000 lb/hr. The maximum sulfur content of the petroleum coke-coal blend shall not exceed 4.00 percent by weight.

g. The permittee shall maintain and submit to the Department on an annual basis for a period of five years from the date the unit is initially fired with petroleum coke, information demonstrating in accordance with 40 CFR 52.21(b)(21)(v) and 40 CFR 52.21(b)(33) that operational changes did not result in emissions increases of nitrogen oxides and particulate matter.

h. The permittee shall maintain and submit to the Department on a semiannual basis for a period of two years from the date the unit is initially co-fired with petroleum coke, and then