



Florida Department of
Environmental Protection

Memorandum

TO: Trina Vielhauer
THRU: J. F. Koerner 
FROM: Michael P. Halpin 
DATE: March 30, 2006
SUBJECT: JEA, St. Johns River Power Park
Petcoke increase
DEP File No. PSD-FL-010, PA 81-13

Attached is a revision to the Technical Evaluation and Final Determination of permit 0310045-014-AC. The applicant has revised the historical emissions for carbon monoxide and is in the process of updating the relevant AOR's. The revision should improve the historical accuracy, as CEMS are being used rather than AP-42 emission factors which were used in the past.

No change to the permit itself is required as the language simply requires that the applicant be able to demonstrate for a period of 5 years that no emission increase has occurred. The Technical Evaluation and Final Determination is referenced as an attachment to the permit, and it is within that document that baseline emissions were established.

It is my recommendation that no public notice be required, as the permit itself is unchanged. Furthermore, all parties to the original permit change have been included in this action, and the cover letter provides them with a right of appeal.

I recommend your approval.

Attachments

/mph



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

March 30, 2006

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Paul M. Smith
Plant Manager
JEA – St. Johns River Power Park
11201 New Berlin Road
Jacksonville, Florida 32226

Re: DEP File No. 0310045-014-AC, PSD-FL-010
St. Johns River Power Park (SJRPP)

Dear Mr. Smith:

The Department is in receipt of your letter dated March 14, 2006 and supporting documentation. Based upon your submittal, it is our understanding that SJRPP is in the process of revising the facility AOR's for years 2000 through 2004, with respect to carbon monoxide (CO) emissions. Your documentation indicates that SJRPP Units 1 and 2 have been equipped with CEMS for CO since the mid-1990's, and that based upon the Department's recent adoption of Rule 62-210.370 Emissions Computation and Reporting, the preferred approach for determining the most accurate computation of annual emissions is through a hierarchy of technical methods, with CEMS being the most preferable.

The Department accepts SJRPP's analysis and supporting documentation. Additionally, the Department recognizes that as a result of the changes to the historical emissions for CO, a revision to an attachment (the Technical Evaluation and Final Determination) related to air construction permit 0310045-014-AC is required, and has been attached.

A copy of this amendment letter and the Technical Evaluation and Final Determination shall be attached to and shall become a part of Permit PSD-FL-010. All other conditions of the referenced permits remain unchanged. A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

This action is final unless a petition is received in accordance with the following requirements:

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241; Fax: 850/245-2303). Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. 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, F.S., or to intervene in this proceeding and participate as

"More Protection, Less Process"

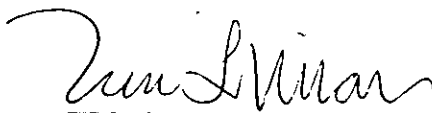
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a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority'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 number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority'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, F.A.C.

Any party to the original permit has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina Vielhauer, Bureau Chief
Division of Air Resource
Management

James M. Chansler, JEA *
Jay A. Worley, JEA
Gregg Worley, EPA
John Bunyak, NPS
Chris Kirts, DEP-NED
Richard Robinson, P.E. ERMD
Hamilton S. Oven, DEP-Siting
Yi Zhu, DEP (ARMS)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this "Technical Evaluation and Final Determination revision" package was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 3/30/06 to the persons listed below.

- James M. Chansler, JEA *
- Jay A. Worley, JEA
- Gregg Worley, EPA
- John Bunyak, NPS
- Chris Kirts, NED
- Richard Robinson, P.E. ERMD
- Mr. Hamilton S. Oven, DEP-Siting

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Mary J. Denny 3/30/06
(Clerk) (Date)

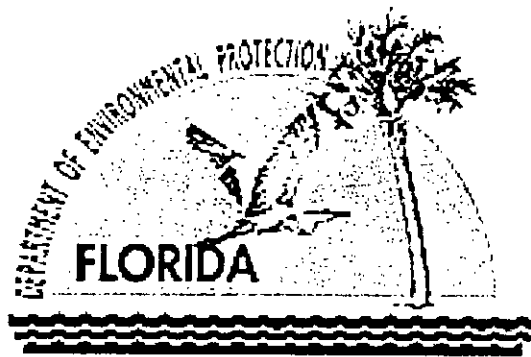
**TECHNICAL EVALUATION
AND
FINAL DETERMINATION**

St. Johns River Power Park

Increased Co-Firing of Petroleum Coke

JEA / DUVAL COUNTY

0310045-014-AC



Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
North Permitting Section

March 30, 2005
Revised March 30, 2006

TECHNICAL EVALUATION AND FINAL DETERMINATION

I. GENERAL INFORMATION

1.1 APPLICANT NAME AND ADDRESS

St. Johns River Power Park
JEA
11201 New Berlin Road
Jacksonville, Florida 32226

Authorized Representative: James M. Chansler, V.P. Operations and Maintenance

1.2 REVIEWING AND PROCESS SCHEDULE

February 2, 2005	Received permit application
March 4, 2005	Issued Draft Intent
March 31, 2005	Issued Final permit revision

2. FACILITY INFORMATION

2.1 FACILITY LOCATION

The facility is located in Jacksonville, Duval County. The UTM coordinates are Zone 17; 446.90 km E; 3359.15 km N. This site is approximately 54 kilometers from the Okefenokee National Wildlife Refuge and 98 kilometers from the Wolf Island National Wildlife Refuge, both Class I PSD Areas.

2.2 STANDARD INDUSTRIAL CLASSIFICATION CODES (SIC)

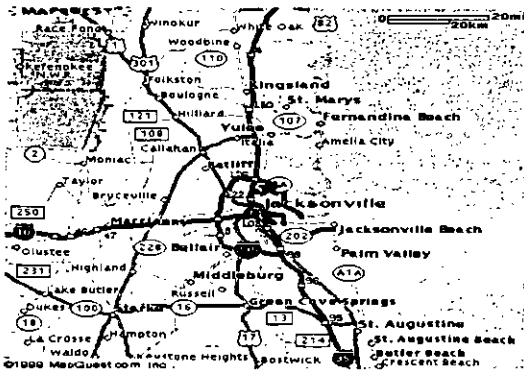
Industry Group No.	49	Electric, Gas and Sanitary Services
Industry No.	4911	Electric Services

2.3 FACILITY CATEGORY

This facility consists of five boilers, Northside Generating Station (NGS) Boilers Nos. 1, 2 and 3 (No. 2 was placed on long-term reserve shutdown on March 1, 1984) and St. Johns River Power Park (SJRPP) Boilers Nos. 1 and 2; four combustion turbines, NGS Nos. 3, 4, 5 and 6 (Nos. 1 and 2 are inactive); and, an auxiliary boiler, NGS No. 1.

SJRPP Boilers Nos. 1 and 2 are fossil fuel-fired steam generators, each having a nominal nameplate rating of 679.6 megawatts (electric). The emissions units are allowed to fire pulverized coal, a blend of petroleum coke and coal, new No. 2 distillate fuel oil (startup and low-load operation), and "on-specification" used oil. The maximum heat input to each emissions unit is 6,144 million Btu per hour. SJRPP Boilers Nos. 1 and 2 are dry bottom wall-fired boilers and will use an electrostatic precipitator (ESP) to control particulate matter, a wet limestone flue gas desulphurization (FGD) unit to control sulfur dioxide, low NO_x burners and low excess-air firing to control nitrogen oxides, and good combustion to control carbon monoxide.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs). This facility is within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD).



TECHNICAL EVALUATION AND FINAL DETERMINATION

3. PROJECT DESCRIPTION

This project primarily addresses the following emissions unit(s):

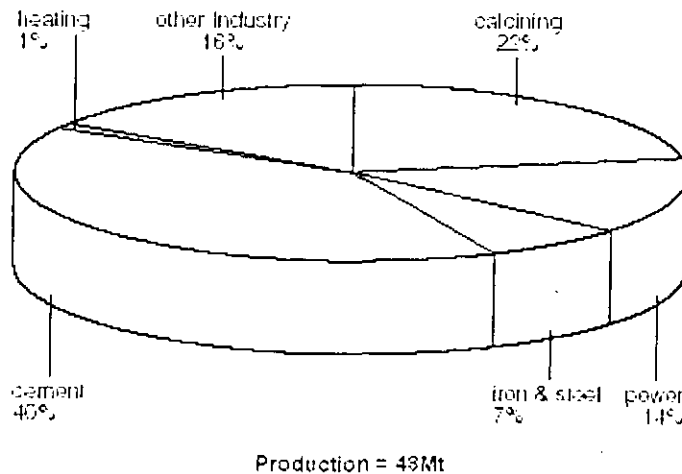
Emissions Unit No.	Emissions Unit Description
016	SJRPP Boiler Number 1 – dry bottom wall-fired boiler w/FGD, ESP and LNB
017	SJRPP Boiler Number 2 – dry bottom wall-fired boiler w/FGD, ESP and LNB

The applicant proposes to increase the combustion of petroleum coke (petcoke) from a maximum of 20% (on a weight basis) to 30%. The facility currently combusts coal as its primary fuel. The applicant indicates that this permit modification can be made in such a way that air emissions will not increase beyond historical levels, thus a PSD Review will not be triggered. The applicant further proposes that data can be provided in accordance with 40 CFR 52.21(b)(21)(v) and 40 CFR 52.21(b)(33) showing that the operational change associated with the use of increased petroleum coke did not result in significant emission increases for PSD pollutants (i.e., the WEPCO provision); emission analyses follow.

3.1 PETCOKE DISCUSSION

Much of this review was obtained from The Clean Coal Centre of the United Kingdom, in an article entitled "*The use of petroleum coke in a coal-fired plant*". Petroleum coke is a by-product from oil refineries and is composed mainly of carbon though it also contains high levels of sulfur and some heavy metals such as vanadium and nickel. There has been considerable interest in petcoke for several years, where it is available, as it is generally significantly cheaper than coal. The price does vary depending on the volumes produced and worldwide demand. The world production of petcoke grew by 50% from 1987 to 1998. It reached nearly 50 Million Tons (Mt) in 1999 and is expected to reach 100 Mt by 2010. The USA is the world's largest producer, producing three-quarters of world supplies. There are three types of petroleum coke, which can be produced depending on the process of production. The three processes are delayed, fluid and flexicoking with delayed coking producing over 90%. All three types of petcoke have higher calorific values than coal and contain less volatile matter and ash. The main uses of petcoke are as an energy source for power generation, in cement production and iron and steel production (which account for about two thirds of production) and the remainder is used mainly as a carbon source.

FIGURE 3 - 1999 WORLD PETROLEUM COKE MARKET PROFILE



The following additional information was compiled for the Year 2001. The source of this data is FERC Form 423, although the Energy Information Administration (EIA) summarized it in a report entitled "*Cost and Quality of Fuels for Electric Utility Plants 2001*", dated March 2004. This data was accumulated for electric generating plants with nameplate capacity of 50 megawatts or more. Tables 25 and 28 from that report are shown below:

TECHNICAL EVALUATION AND FINAL DETERMINATION

Table 25. The Top 20 Electric Utilities, Ranked by Receipts of Coal, 2001

Electric Utility	Receipts: (thousand short tons)	Average Delivered Cost		Total Delivered Cost (million dollars)
		(cents per million Btu)	(dollars per short ton)	
1. Tennessee Valley Authority	56,556	121.92	27.99	1,623.15
2. Georgia Power Co.	33,639	166.28	39.06	1,313.94
3. TXU Electric Co.	27,297	131.74	18.01	491.74
4. Alabama Power Co.	24,211	141.58	30.07	728.00
5. PacifiCorp.	22,216	87.26	17.25	383.23
6. Detroit Edison Co.	20,155	122.38	25.05	505.59
7. Ameren UE	18,797	95.10	17.28	324.57
8. Duke Power Co.	17,395	157.31	38.53	670.23
9. Public Service Co of Indiana	16,542	130.20	24.35	402.81
10. Reliant HL&P	16,423	157.06	24.47	401.93
11. Basin Electric Power Coop.	16,275	59.00	8.35	143.95
12. Ohio Power Co.	15,598	143.01	34.01	520.79
13. Kansas Power and Light Co.	12,942	115.59	20.09	250.03
14. Mid-American Energy	11,607	74.96	12.90	175.50
15. Northern States Power Co.	11,255	94.52	16.70	221.36
16. Arkansas Power and Light Co.	11,651	78.54	13.74	174.20
17. Indiana Michigan Power	11,904	117.41	22.71	270.30
18. Southwestern Electric Power	11,553	130.44	24.11	256.51
19. Wisconsin Electric Power Co.	11,565	102.91	19.29	228.91
20. Appalachian Power Co.	11,558	129.56	31.09	363.64

Note: Data are for electric generating plants with a total steam-electric and combined-cycle nameplate capacity of 50 or more megawatts.
Source: Federal Energy Regulatory Commission, FERC Form 425, "Monthly Report of Cost and Quality of Fuels for Electric Plants."

Table 28. Receipts of Petroleum Coke by Electric Utility, 2001

Electric Utility	Receipts: (thousand short tons)	Average Quality			Average Delivered Cost	
		Btu (per pound)	Sulfur (percent by weight)	Ash (percent by weight)	(cents per million Btu)	(dollars per short ton)
Ameren UE	167	14,303	3.72	0.40	66.55	19.12
Central Elec Power Coop-Missouri	*	14,255	3.20	.56	52.52	15.04
Jacksonville Electric Auth.	568	14,255	6.28	.20	62.53	17.85
Lakeland City of	18	13,955	4.19	.44	127.02	35.45
Manitowoc Public Utilities	36	14,214	5.51	.53	54.73	15.58
Michigan South Central Power	*	14,002	4.65	.43	150.01	42.01
Northern States Power Co.	201	13,613	5.64	.70	39.12	10.65
Northern Indiana Pub Ser. Co.	149	13,927	4.34	.20	69.32	19.31
Reliant HL&P	132	13,609	1.66	.44	156.57	42.61
Salt River Proj. Ag. & P. Dist.	17	14,500	3.67	.50	100.48	29.14
Seminole Electric Coop.	152	14,194	5.58	.41	110.74	31.85
Tampa Electric Power Co.	303	13,945	4.90	.46	82.57	23.06
Wisconsin Power & Light	71	13,920	5.70	.56	96.25	26.30
Wisconsin Electric Power Co.	145	14,201	5.24	.20	87.79	24.91
Total	2,019	14,079	5.13	.40	75.38	22.07

* Includes a small amount of coal

* = Number less than 0.5.

Note: * Totals may not equal sum of components because of independent rounding. * Data are for electric generating plants with a total steam-electric and combined-cycle nameplate capacity of 50 or more megawatts.

Source: Federal Energy Regulatory Commission, FERC Form 425, "Monthly Report of Cost and Quality of Fuels for Electric Plants."

Of interest, no Florida utilities show up in the top 20 listing of coal users, even though Florida is one of the most populous states. It is observed that the cost of petroleum coke in year 2000 was approximately 1/2 that of coal. According to Table 28, Florida had 4 users of petcoke out of 14 listed users. The tables also show that receipts of petcoke totaled 2019 thousand short tons, or about 0.5% of the sum of coal receipts of the top 20 coal users. Only 4 utilities are listed on both tables: Northern States Power, Ameren UE, Wisconsin Electric Power Co. and Reliant HL&P (Northern States Power is now known as XCEL Energy, headquartered in Minnesota). Jacksonville Electric Authority (JEA) is indicated as the largest utility user of petcoke during year 2001 for electrical generation.

TECHNICAL EVALUATION AND FINAL DETERMINATION

4. PROJECT EMISSIONS

4.1 HISTORICAL EMISSIONS

The following table summarizes the historical emissions (EU-016 and 017) based upon Department records (ARMS):

Pollutant	2001 Actual Emissions (TPY)	2002 Actual Emissions (TPY)	2001-2002 Average (TPY)	PSD Significant Emission Rates (TPY)	Maximum average Emission Rate without a PSD review (TPY)
NO _x	26379.1	26738.5	26558.8	40	26598.7
CO	14463.5	12891.6	13677.5	100	13776.5
VOC	118.873	118.179	118.53	40	158.5
SO ₂	22535.41	20902.199	21718.8	40	21758.7
SAM	1311.0	1322.9	1316.9	7	1323.8
PM	317.258	326.2401	321.75	25	346.7
PM ₁₀	72.964	75.596	74.28	15	89.2
Pb	1.21	0.81	1.01	0.6	1.59

Note: Years 2001 and 2002 were proposed by the applicant as a "representative" period for comparison to future emissions.

5. RULE APPLICABILITY

This facility is located in an area designated, in accordance with Rule 62-204.340, F.A.C., as attainment for all pollutants. Rule 62-4.030, F.A.C., prohibits modification of any existing emissions unit without first receiving a permit. It further specifies that a permitted installation may only be modified in a manner that is consistent with the terms of such a permit. Rule 62-210.200, F.A.C., defines "modification" to mean generally a physical change or change in the method of operation that results in an increase in actual emissions of regulated air pollutants. Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C., also reiterate the requirement for construction permits. Additionally, Rule 62-210.300 requires an Air Construction permit for all new sources of air pollution unless specifically exempt.

FDEP deems that a change to the quantity or quality of fuel burned is a change in the method of operation. Given that the source is major with regard to PSD, an analysis must be performed to verify that the increased burning of petcoke will not result in a significant net emissions increase and that, consequently, use of additional petcoke is not a major modification subject to PSD review. The emission units affected by this permit shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations incorporated therein).

TECHNICAL EVALUATION AND FINAL DETERMINATION

6. PSD POLLUTANT ANALYSIS

6.1 COAL VERSUS PETCOKE

The following table was excerpted from a paper presented at the 2003 International Power-Gen Conference in Las Vegas, Nevada. The paper is entitled "Reducing NO_x and LOI at the St. Johns River Power Park":

	Pet. Coke	Colombian Coal
Prox. Analysis		
Fixed Carbon	83.92	47.60
VM	8.50	33.40
Ash	0.52	7.40
Moisture	7.06	11.60
Total	100.00	100.00
Ult. Analysis		
Carbon	82.22	66.54
Hydrogen	3.35	4.50
Oxygen	0.00	7.99
Nitrogen	1.71	1.32
Sulfur	5.14	0.65
Ash	0.52	7.40
Moisture	7.06	11.60
Total	100.00	100.00
HHV, Btu/lb as-rec'd	14,200	11,800

This table was excerpted from a cement plant application in the United Kingdom (Castle Cement dated May 17, 1999):

Chemical Names	Units	Coal	Petroleum coke	Increase or Decrease
Heat Content	CV-MJ/kg	25.5	31.41	Increase
Carbon	% Carbon	73.4	85	Increase
Chlorine	Cl %	0.03	NA	Decrease
Copper	Cu (ppm)	12	3	Decrease
Lead	Pb	16	5	Decrease
Zinc	Zn	NA	17	Increase
Cadmium	Cd	10	0.04	Decrease
Chromium	Cr	8	5	Decrease
Thallium	Th	10	0.05	Decrease
Arsenic	As	7	1	Decrease
Mercury	Hg	10	NA	Decrease
Antimony	Sb	3	1	Decrease
Cobalt	Co	2	3	Increase
Manganese	Mn	71	NA	Decrease
Nickel	N	6	252	Increase
Tin	Sn	10	1	Decrease
Vanadium	V	4	150	Increase
Sulfur	S%	1.4	5.0	Increase

TECHNICAL EVALUATION AND FINAL DETERMINATION

The purpose of the above tables is to illustrate that the PSD pollutant of most concern is sulfur. Due to the decreases in the lead and ash content in petcoke, increased firing should lead to reductions in the emissions of PM, PM₁₀ and Pb. The Department notes that the emissions of nickel and vanadium are not subject to PSD, but may subject the facility to a future MACT requirement.

6.2 CARBON MONOXIDE (CO) AND VOLATIVE ORGANIC COMPOUNDS (VOC)

The applicant contends that there will be no increase in CO or VOC emissions from the increased co-firing of petcoke. The annual CO emissions for these emission units averaged 13677.5 TPY, while annual VOC emissions averaged 118.5 TPY. The Significant Emission Rate for CO is 100 TPY, and for VOC is 40 TPY. Given that the available data shows reduced CO and VOC emissions from the firing of petcoke as compared to coal, the Department finds it unlikely that the increased co-firing of petcoke will cause annual emissions to exceed the PSD thresholds of each pollutant beyond representative past emission rates. Accordingly, a BACT review is not required for these pollutants.

6.3 NITROGEN OXIDE (NO_x)

Test results from other facilities indicate that NO_x emissions are typically less for petcoke firing as compared to coal firing. The annual NO_x emissions for these emission units averaged 26558.8 TPY and the Significant Emission Rate for NO_x is 40 TPY. The Department accepts the premise that increased petcoke firing (and decreased coal firing) will not cause annual NO_x emissions to increase, nor specifically to exceed an average of 26598.7 TPY per emission unit. Accordingly, a BACT review is not required.

6.4 SULFUR DIOXIDE (SO₂) AND SULFURIC ACID MIST (SAM)

The past actual average emissions of SO₂ and SAM were 21718.8 and 1316.9 TPY respectively. The Significant Emission Rate (SER) is 40 TPY for SO₂ and 7 TPY for SAM. The Department accepts the applicant's proposal that SO₂ and SAM emissions can be maintained below the respective SER by additional scrubbing with the existing wet FGD. The applicant additionally proposes to reduce the SO₂ limit (while co-firing) below the existing permit limit, as an additional means of providing assurance to the Department that SO₂ (as well as SAM) emissions will not increase. The combination of additional scrubbing and a reduced emission limit is acceptable to the Department and should ensure that the annual emission levels of SO₂ and SAM do not exceed the PSD thresholds for each pollutant beyond representative past emission rates (21758.7 TPY SO₂ and 1323.8 TPY SAM). In addition to this, the Department will place a limit on the throughput of petcoke at 30% on a heat input basis. Accordingly, the SO₂ and SAM emission increases are considered insignificant for PSD purposes and BACT reviews are not required.

6.5 PARTICULATE MATTER (PM/PM₁₀)

As indicated above, it is reasonable to assume that PM₁₀ and PM emissions will be lowered as a result of the ten-fold decrease in fuel ash. Accordingly, the annual PM/PM₁₀ emissions from the stack are likely to be maintained with no increase above the PSD significant emission rate of 25/15 tons/year.

With regard to ancillary (or fugitive) emissions, the applicant estimates that particulate matter emissions will be reduced. This is based upon the increased heat input value of petcoke as compared to coal, meaning that a reduction in the overall tons of fuel handled will occur. In summary, the average PM/PM₁₀ emissions from each emission unit are likely to remain less than the PSD thresholds for each pollutant and no PSD Review is required.

6.6 SUMMARY

A preliminary review supports the applicant's contention that PSD is not triggered, eliminating the requirement for a BACT review and related modeling. PSD regulations (under the provisions commonly known as the "WEPCO rule") allow a source undertaking a non-routine change that could affect emissions at an electric utility steam generating unit to lawfully avoid the major source permitting process by using the unit's representative actual annual emissions to calculate emissions following the change, if the source submits information for 5 years following the change to confirm its pre-change projection. Under the WEPCO rule, SJRPP must compute baseline actual emissions and must project the future actual emissions from the modified units for a period after the physical change. In addition, SJRPP must maintain and submit to the Department on an annual basis for a period of at least 5 years

TECHNICAL EVALUATION AND FINAL DETERMINATION

from the date the units resume regular operation, information demonstrating that the change did not result in a significant emissions increase. If SJRPP fails to comply with the reporting requirements of the WEPCO rule or if the submitted information indicates that emissions have increased above PSD thresholds as a consequence of the change, it will be required to obtain a PSD permit for petcoke co-firing (meaning that a BACT Review would then be applicable). Finally, even though a PSD review is not triggered due to the co-firing project, SJRPP must meet all other applicable federal, state, and local air pollution requirements.

7. ADDITIONAL COMPLIANCE PROCEDURES (AVERAGE PER EMISSION UNIT)

Pollutant	Compliance Procedures
NO _x	Five years of annual reporting by CEMS proving annual emissions do not exceed 26598.7 TPY
CO	Five years of annual reporting by stack test proving annual emissions do not exceed 13776.5 TPY
VOC	Five years of annual reporting by historical AOR methods, proving annual emissions do not exceed 158.5 TPY
SO ₂	Five years of annual reporting by CEMS proving annual emissions do not exceed 21758.7 TPY
SAM	Five years of annual reporting by stack test proving annual emissions do not exceed 1323.8 TPY
PM	Five years of annual reporting by stack test proving annual facility emissions do not exceed 346.7 TPY

Specific permit conditions shall further describe these limitations. The reporting procedures are to begin during the first calendar year in which petcoke is fired.

8. CONCLUSION

Based on the foregoing technical evaluation of the application, additional information submitted by the applicant and other available information, the Department has made a final determination that the proposed project will comply with all applicable state and federal air pollution regulations.

Michael P. Halpin, P.E. Review Engineer
Department of Environmental Protection, Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

9. 2006 REVISION

The tables within Section 4.1 and 7 herein are revised as of March of 2006 in order to more accurately reflect historical carbon monoxide emissions, since the related permit references these tables. The data reflected within this revision is based upon historical CEMS data which the Department considers more accurate than AP-42 emission factors (see 62-210.370, F.A.C.).

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X <i>J. Smith</i></p>	
<p>1. Article Addressed to:</p> <p>Mr. Paul Smith, Plant Manager JEA-St. Johns River Power Park 11201 New Berlin Road Jacksonville, Florida 32226</p>		<p>B. Received by (Printed Name) <i>Jed Smith</i></p>	<p>C. Date of Delivery <i>4-4-08</i></p>
<p>2. Article Number (Transfer from service label) 7000 1670 0013 3110 1656</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>PS Form 3811, February 2004</p>		<p>Domestic Return Receipt 102595-02-M-1540</p>	

7000 1670 0013 3110 0789

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
Postage \$	
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Postmark Here	
<p>To: Mr. James M. Chansler V.P. Operations and Maintenance JEA St. Johns River Power Park 21 West Church Street Jacksonville, Florida 32202</p>	
<p>PS Form 3800, May 2000 See Reverse for Instructions</p>	

7000 1670 0013 3110 1656

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
Postage \$	
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Postmark Here	
<p>To: Mr. Paul Smith, Plant Manager JEA-St. Johns River Power Park 11201 New Berlin Road Jacksonville, Florida 32226</p>	
<p>PS Form 3800, May 2000 See Reverse for Instructions</p>	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X <i>[Signature]</i></p>	
<p>1. Article Addressed to:</p> <p>Mr. James M. Chansler V.P. Operations and Maintenance JEA St. Johns River Power Park 21 West Church Street Jacksonville, Florida 32202</p>		<p>B. Received by (Printed Name) <i>[Signature]</i></p>	<p>C. Date of Delivery <i>4-4-08</i></p>
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<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>PS Form 3811, February 2004</p>		<p>Domestic Return Receipt 102595-02-M-1540</p>	