

ENV 122101

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DEC 26 2001



December 21, 2001

Al Linero, P.E.
Division of Air Resources Management
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

BUREAU OF AIR REGULATION

RE: St. Johns River Power Park (SJRPP), Site Certification No. PA-81-13
PSD Permit No. PSD-FL-010; Title V Permit No. 0310045-002-AV
Burner Component Replacement Project

Dear Mr. Linero:

In an effort to reduce nitrogen oxides (NOx) emissions from the St. Johns River Power Park's two steam generating units, SJRPP plans to replace some of the existing burner components with new ones using state-of-the-art designs. With the burner component replacements, both NOx and carbon monoxide (CO) emissions will be reduced. The first phase of this project is planned for the first quarter of 2002, followed by a second phase in 2003 and the final phase in 2004. Because this is a replacement project resulting in reduced emissions, no permit or permit revision is necessary.


The two 660 MW coal-fired steam generating units began operating in 1986 and 1988 respectively. The Prevention of Significant Deterioration permit and Conditions of Certification limited NOx emissions to 0.60 pounds per million British thermal units (lb/mmBtu) on a 30-day rolling average basis while firing solid fuel. Through an early election under the federal Acid Rain Program, the units' annual average NOx emissions were subsequently limited to 0.50 lb/mmBtu beginning on January 1, 1997. This limit will remain in effect only through January 1, 2008, at which time a much lower annual average NOx limit will be imposed. In anticipation of the lower NOx limit, SJRPP is planning the above-mentioned burner component replacements starting early next year.

Initially SJRPP will replace components on eight of Unit No. 2's twenty-eight existing burners during the Spring 2002 outage to ensure that the equipment operates as efficiently and as effectively as planned before making a further investment in this technology. Assuming that the NOx and CO reductions are as expected, and based on scheduled unit outages, the components on all of the Unit No. 1 burners would be replaced in 2003, followed by completion of the Unit No. 2 component replacements in 2004.

If you need any additional information or have any questions, please contact me at (904) 751-8729

926/665-4729

Sincerely,


Jay Worley
Group Leader

cc: Hamilton S. Owen, DEP Siting
Chris Kirts, DEP NE District
Jim Manning, RESD