John Brown
JACKSONVILLE ELECTRIC AUTHORITY
P. O. BOX 53015
233 W. DUVAL STREET
JACKSONVILLE, FL 32201

CERTIFIED MAIL

st. johns river POWER PARK

SJRENV 86-43

December 18, 1986

Mr. Hamilton S. Oven, Jr., P.E.
Administrator, Power Plant Siting
Fla. Dept. of Env. Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Oven:

Subject: St. Johns River Power Park Unit 1
Notification of Initial Startup

The notification of the actual date of initial startup of an affected facility is required as specified in 40 CFR 60.7(3). The date of initial startup for the above referenced facility was December 15, 1986.

Notification of the anticipated date of initial startup as required in 40 CFR 60.7(2) was submitted to your agency November 15, 1986.

Please advise if you have any questions regarding this notification.

Very truly yours,

Richard Breitmoser, P.E.
Division Chief
Research & Environmental
Affairs Division

RB/AJT/lwr

cc: E. Frey (FDER)
D. Bayly (BES)

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)	Initial / Date
2. ~~CLAIR FANCY~~ ~~BILL~~ DER	Initial / Date
3. Preston BAQM DEC 24 1986 cc: 4/2/87 BAR	Initial / Date
4.	Initial / Date

REMARKS:

fyi / file

INFORMATION	
	Review & Return
	Review & File
	Initial & Forward

DISPOSITION	
	Review & Respond
	Prepare Response
	For My Signature
	For Your Signature
	Let's Discuss
	Set Up Meeting
	Investigate & Report
	Initial & Forward
	Distribute
	Concurrence
	For Processing
	Initial & Return

FROM: Buck Owen

DATE 12-23

PHONE 8-0130

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4APT-AP/ch

OCT 2 8 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Richard Breitmoser, P. E.
Division Chief
Research and Environmental Affairs Division
Jacksonville Electric Authority
P. O. Box 53015
233 W. Duval Street
Jacksonville, Florida 32201

RE: St. John's River Power Park PSD-FL-010

Dear Mr. Breitmoser:

This letter is in response to your May 12, 1986, request for coal terminal and blending modifications at the above-referenced facility permitted on March 12, 1982, by EPA Region IV. The Florida Department of Regulation (FDER) published a public notice announcing the proposed coal handling modifications on July 28, 1986. No comments were received and the FDER subsequently recommended that the PSD permit be modified.

In addition to the above, we have reviewed recommendations from The Department of Health, Welfare, and Bio-Environmental Services (City of Jacksonville, Florida) dated July 1, 1986, regarding opacity and control of fugitive emissions from shiploading, and subsequent recommendations from your office dated August 27, 1986, regarding emission limits and testing of non-stack emission points. In response to these recommendations and communications with the FDER, your PSD permit (PSD-FL-010) is hereby modified as follows:

1. The second paragraph of Condition of Approval No. 3 is changed from the existing wording regarding compliance testing of particulate emission points to the following:

   "Opacity tests shall be performed for emission points three (3) through nineteen (19) of revised Table 6 for compliance purposes. If the opacity limits are not met for those sources that exhaust through a stack, permit compliance shall be determined on the basis of mass emission rate tests."

2. Table 2 of the final determination is replaced by revised Table 2 (enclosed).

3. Table 6 of the final determination is replaced by revised Table 6 (enclosed).

4. All reference to Table 2 and Table 6 in Conditions of Approval numbers 2, 3, 4, and 5, as contained in the March 12, 1982 PSD permit, shall be construed to pertain to the enclosed revised Tables 2 and 6.

Please be advised that the modification to your PSD permit herein described shall become a binding part of permit PSD-FL-010. This permit modification shall become effective upon receipt of this letter, unless you notify us of your unacceptance of the conditions contained herein within ten (10) days after receipt of this letter.

If you have any questions regarding this permit modification, please contact Mr. Wayne J. Aronson, Chief, Program Support Section, at (404) 347-4901.

Sincerely yours,

/s/ Lee A. DeHihns, III
Deputy Regional Administrator

Jack E. Ravan
Regional Administrator

Attachments: 2

cc: Mr. Clair H. Fancy
Deputy Bureau Chief
Florida Department of Environmental Regulation

Table 6. Allowable Emission Limits (Revised; From PSD Permit) (lb/hour; lb/MMBtu)

	Emission Unit	SO_2	NO_x	PM (Revised Original)	Opacity (Percent)
1.	Steam Generating Boiler No.1 (6.144 MMBtu/hr maximum heat input)	4,669.: 0.76 (30-day rolling average)	3,686: 0.6	184: 0.03	20
2.	Steam Generating Boiler No. 2 (6.144 MMBtu/hr maximum heat input)	4,669: 0.76 (30-day rolling average)	3,686: 0.6	184: 0.03	20
3.	Auxiliary boilers (254 MMBtu/hr maximum heat input total)	203: 0.8		25.0: 0.1	20
4.	Ship Unloading (2 Grab Buckets)*			1.0	10
5.	Feeders to Conveyor A (2 Wet Suppression points)*			0.13	10
6.	Conveyor Transfers 1 & 2 (2 points)*			0.57	10
7.	Conveyor Transfer 3, 4, 5 & D to D by-pass (4 points)*			2.6	10
8.	Conveyor Transfers 6 & 7 (2 points)*			1.0	10
9.	Traveling Stacker (3 points)*			0.8	10
10.	Bucket Wheel Reclaimer (2 points)*			0.6	10
11.	Ship unloading facility coal storage pile			1.6	10
12.	Coal handling transfer points ship unloading facility coal pile (8 points)*			1.8	10
13.	Rail car unloading (Rotary Dumper)			5	10
14.	Coal handling transfer points (6 wet suppression points)			5(each)	10
15.	Coal handling transfer points (11 dry collection)			0.1(each)	10
16.	Coal storage at plant* (10 acres active)			0.5	10
17.	Coal storage at plant* (2 to 13-acre inactive piles)			0.02	10
18.	Limestone unloading (rail dumper)			0.1	10
19.	Limestone transfer points			0.4(each)	10
20.	Cooling towers			67(each tower)	N/A

* Revised emission unit, May 1986.

Table 2. Fugitive Emissions and Control Summary (Revised; From PSD Permit)

Process		Type	Amount	Factor	Control	Technique	Emissions (Grams/Sec)
1	Ship Unloading*	2 Grab Buckets	2,200 Tons/hr	0.0016 lb/Ton+	70.0%	Suppression, Enclosure	0.13
2	Feeders to Conveyor A*	2 Points	2,200 Tons/hr	0.00039 lb/Ton	85.0%	Suppression, Enclosure	0.02
3	Conveyor Transfers, 1 and 2*	2 Points	2,200 Tons/hr	0.00087 lb/Ton**	85.0%	Suppression Enclosure	0.07
4	Conveyor Transfers 3, 4, 5 and D to D by-pass*	4 Points	2,200 Tons/hr	0.00118 lb/Ton**	75.0%	Enclosure, Conditioned Material	0.33
5	Conveyor Transfers 6 and 7*	2 Points	2,000 Tons/hr	0.00106 lb/Ton**	75.0%	Enclosure, Conditioned Material	0.13
6	Traveling Stacker*	3 Points: 1 Point	2,200 Tons/hr	0.00031 lb/Ton	75.0%	Enclosure, Conditioned Material	0.02
		1 Point	2,200 Tons/hr	0.00039 lb/Ton	75.0%	Enclosure, Conditioned Material	0.03
		1 Point	2,200 Tons/hr	0.00017 lb/Ton	0.0%		0.05
7	Bucket Wheel Reclaimer*	2 Points	2,000 Tons/hr	0.00063 lb/Ton**	75.0%	Enclosure, Conditioned Material	0.08
8	Ship-Unloading Facility Coal Surge Pile	Active	30 Acres	13 lb/Acre/day[a]	(90%)[a]	Wetting Agent	0.20
9	Coal Handling Transfer Points Ship Unloading Facility Coal Pile*	8 Points	2,200 Tons/Hr.	0.00041 lbs/Ton**	75.0%	Enclosure, Conditioned Material	0.23
10	Rail Car Unloading	Rotary Dumper	10,000 Tons/Day	0.4 lb/Ton[a]	(97%)[b]	Wet Suppression	0.63
11	Coal Handling Transfer Points	2 Points	10,000 Tons/Day	0.2 lb/Ton[c]	(99.9%)[b]	Dry Collection	0.02
12	Coal Handling Transfer Points	2 Points	3,300 Tons/Day	0.2 lb/Ton[c]	(99.9%)[b]	Dry Collection	0.01
13	Coal Handling Transfer Points	6 Points	3,300 Tons/Day	0.2 lb/Ton[c]	(97%)[b]	Wet Suppression	0.62
14	Coal Handling Transfer Points	7 Points	5,000 Tons/Day	0.2 lb/Ton[c]	(99.9%)[b]	Dry Collection	0.04
15	Coal Storage At Plant*	Active	10 Acres	13 lb/Acre/day[a]	(90%)[a]	Wetting Agent	0.07
16	Coal Storage At Plant*	2 Inactive Piles	13 Acres	3.5 lb/Acre/day[a]	(99%)[a]	Wetting Agent	0.002
17	Limestone Unloading	Rail Dumper	750 Tons/Day	0.4 lb/ton[a]	(97%)[b]	Wet Suppression	0.05
18	Limestone Transfer	1 Point	750 Tons/Day	0.2 lb/Ton[a]	(99.9%)[b]	Dry Collection	0.001
19	Cooling Towers	Drift	2 x 243,500 gal/min	51,450 ppm solids (maximum) (40% < 50 microns diameter)	99.998%	Drift Elimination	12.66
20	Solid Waste Disposal Area	Active	10 Acres	13 lb/Acre/day[a]	(90%)[a]	Wetting Agent	0.07

* Revised process or emissions, May 1986.
\+ Weighted average based on 1,500 and 700 STPH ship unloaders.
** Average of emission factors for individual sources.

a. Pedco, 1977.
b. Stoughton, 1980.
c. EPA, 1979.

0400b(050886)PM

SJRENV 86-3

September 29, 1986

Mr. Hamilton S. Oven, Jr., P.E.
Administrator, Power Plant Siting
Fla. Dept. of Env. Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Oven:

Re: St. Johns River Power Park
Operating Restrictions

This is to provide the Florida Department of Environmental Regulation with an operating plan and supporting justification that the JEA will follow to permanently eliminate emissions from steam generating units equivalent to the impact of the emissions from Southside Units 1 and 2 (pursuant to Condition of Certification I.E. Operating Restrictions).

The JEA currently has five steam generating units in extended cold storage (ECS). Two of these units are Southside Units 1 and 2. The units were placed into ECS in February, 1983. The sister units are the oldest and smallest of the group of steam generators in ECS. Having these statistics, the units are not scheduled for reactivation until the larger and newer units in ECS are returned to service. Although it cannot be stated with absolute certainty that the units will not be returned to service within the next five year period, it is highly probable that they will not operate.

It is proposed, therefore, that the extended cold storage of Southside Units 1 and 2 be considered to satisfy fully the intent of Condition of Certification I.E. Further, the JEA will commit to a 180 day advance notification of the planned start-up of Southside Units 1 and/or 2. An operating plan to offset these emissions would accompany the advance notification.

With regard to operation of SJRPP during an air pollution episode pursuant to 17-2.320(3), FAC, it is proposed that the SJRPP facility continue to operate normally during any episode level, i.e., alert warning or emergency.

This proposed operating plan during an air episode period is recommended because of the advanced degree of pollution control equipment installed at SJRPP. The control devices include boiler design to minimize nitrogen oxides, electrostatic precipitators and flue gas desulfurization. The flue gas from the facility then exits through a 640 foot stack.

(CONT.)

It should be recognized that the balance of the JEA system (Northside, Southside and Kennedy generating stations) would remain under an episode plan on file with the FDER and the Jacksonville Bio-Environmental Services Division. The operation of SJRPP would enhance the ability of load shift and unit shutdown required, under certain episode conditions, of JEA's existing steam generating units.

Your consideration of the above information to satisfy the requirements of Condition of Certification I.E. is most appreciated. Please contact me (904-633-4517) if there are any questions concerning the operating plan.

Very truly yours,

Richard Breitmoser (ajs)

Richard Breitmoser, P.E.
Division Chief
Research & Environmental
Affairs Division

RB/lwr

cc: E. Frey (FDER)
D. Bayly (BES)

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

September 26, 1986

Mr. Mike Brandon
Air Progress Branch
U.S. EPA - Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Brandon:

Re: Revision of PSD-FL-010, JEA Coal Conveyor

The Jacksonville Electric Authority (JEA) published the public notice for the above referenced project on July 28, 1986, in the Florida Times Union. The only comments received during the public comment period were from JEA. I have enclosed copies of the public notice and comments for your review.

If you have any questions or need additional information, please call me at (904)488-1344.

Sincerely,

Edward J. Svec
Senior Compliance Engineer
Bureau of Air Quality
Management

ES/ks

cc: Richard Breitmoser, P.E.

JACKSONVILLE ELECTRIC AUTHORITY
P. O. BOX 53015
233 W. DUVAL STREET
JACKSONVILLE, FL 32201

SJRCTENV 86-30

August 27, 1986

DER
AUG 28 1986
BAQM

st. johns river POWER PARK

Mr. Ed Svec
Bureau of Air Quality Management
Fla. Dept. of Env. Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Svec:

Re: Jacksonville Electric Authority
St. Johns River Coal Terminal
Revision of PSD Permit PSD-FL-010

Please consider the following comments during the review of the permit modifications requested. Public notice of our permit modification request was published on July 28, 1986, initiating a 30 day comment period. These comments are being submitted within the 30 day comment period.

1. Please review existing PSD permit language contained in Section V, Conclusion, Item 3 (page 10) which states:

"Emission points 3 through 13 of Table 6 are exempted from mass emission rate compliance tests unless opacity limits are exceeded or the Administrator (or his representative) otherwise determines that such performance testing is required."

We believe this language should be modified based on the following points:

a) Many of emission points 3 through 13 of Table 6 are fugitive-type sources. Therefore, mass emission rate compliance tests are extremely difficult, if not impossible, to perform accurately. In practice, permit compliance will consequently be determined in reference to the opacity standard. Emission points 14 and 15 are also fugitive-type sources which should also have been included under the mass emission rate compliance test exemption. This omission appears to have been an oversight in the original permit.

b) The function of Table 6 is to present "allowable emission limits". For emission points 3 through 15, particulate emission limits are expressed as both an opacity and a pound per hour limitation. The relationship between the mass emission and opacity limits for a given source on Table 6 are not clear, especially in reference to fugitive-type emission sources. At best, the relationship

(CONT.)

between mass emissions and opacity is theoretical. In practice, there are many variables that prevent a clear relationship. Therefore, the provision of both an opacity and a mass emission rate standard establishes 2 separate, conflicting limits.

c) A 10% opacity standard is the applicable emission limit intended by both EPA and FDER (Conditions of Certification) at the time of permit issuance.

A revision of Table 6 of our PSD permit was requested in our modification submittal dated May 12, 1986. As a bookkeeping matter emission sources 3 through 15 in the existing permit would become sources 3 through 19 in the proposed modification of Table 6.

To summarize, Table 6 references two types of particulate standards which are related in a variable fashion which is imperfectly understood in actual practice, especially for fugitive sources. Therefore, the values specified for the two types of standards are contradictory. One type of standard (mass emissions) is difficult or impossible to measure accurately for fugitive sources. The other standard (10% opacity) is reinforced as EPA and FDER intent by textual citations elsewhere. In light of these considerations, and the proposed renumbering of emission sources in Table 6, we request that the aforementioned permit language be replaced by:

> "Opacity tests shall be performed for emission points 3 through 19 of Table 6 for compliance purposes. If the opacity limits are not met for those sources that exhaust emissions through a stack, permit compliance shall be determined on the basis of mass emission rate tests.

2. Please delete mass emission rate limits for Table 6 for emission points 4 through 15 (emission points 4 through 19 in the proposed revision of Table 6).

In light of the previous discussion and presuming agency acceptance of request (1), the presence of mass emission rate limits for fugitive sources on a table entitled "Allowable Emission Limits" is confusing. The mass emission rate values that appear in both the existing permit and in the proposed revision are estimates only, based on AP-42 emission factors and estimates of control efficiency. The numbers are helpful to indicate the approximate significance of various emission points, but in any given instance an AP-42 emission factor may not precisely predict emission levels, specially with regard to

(CONT.)

fugitive sources. EPA acknowledges the variation in reliability among the AP-42 emission factors by assigning reliability ratings. The reliability ratings assigned to factors that estimate fugitive dust emissions tend toward the bottom.

The mass emission rate estimates contained in our PSD permit modification request were developed to be used in a emission offset procedure to determine whether the emissions associated with a design change would be greater or less than the emissions associated with the original design.

Therefore, we request that numbers presented as mass emission rate estimates only, should not be cited in a table entitled "Allowable Emission Limits", and that therefore mass emission rate limits for sources 4 through 15 (4 through 19 in the proposed revision of Table 6) should not appear in Table 6.

If you would like to discuss this matter further, please call Ms. Athena Tsengas at (904) 633-4517.

Very truly yours,

Richard Breitmoser (ajt)

Richard Breitmoser, P.E.
Division Chief
Research & Environmental
Affairs Division

RB/AJT/lwr

cc: Clair Fancy

JACKSONVILLE ELECTRIC AUTHORITY
P. O. BOX 53015
233 W. DUVAL STREET
JACKSONVILLE, FL 32201

SJRCT 86-33

DER

AUG 6 1986

BAQM

August 1, 1986

Mr. Edward Svec
Review Engineer
Bureau of Air Quality Management
Fla. Dept. of Env. Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Dear Mr. Svec:

Subject: Jacksonville Electric Authority
St. Johns River Power Park and
St. Johns River Coal Terminal
Certification of Public Notice

Enclosed is a copy of the Public Notice which was printed in the Florida Times Union on July 28, 1986. The Public Notice is for the proposed revision of our federal permit PSD-FL-010.

If you have any questions, please feel free to call Athena Tsengas at (904) 633-4517.

Very truly yours,

Richard Breitmoser, P.E.
Division Chief
Research & Environmental
Affairs Division

RB/AJT/RLS/lwr

Enclosure: As Noted

The Florida Times-Union | Jacksonville Journal

FLORIDA PUBLISHING COMPANY

Publishers

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared George A. Dan

who on oath says that he is

Retail Advertising Manager of The Florida Times-Union, and

Jacksonville Journal, daily newspapers published at Jacksonville in Duval County,

Florida; that the attached copy of advertisement, being a

Legal Notice

in the matter of Public Notice

in the _____ Court,

was published in The Florida Times Union

in the issues of July 28, 1986

Public Notice

On May 12, 1986, the Jacksonville Electric Authority requested that their Prevention of Significant Deterioration permit (PSD-FL-010) for two coal-fired steam generating units adjacent to the existing JEA Northside Generation Station near Jacksonville, Florida, be revised. This permit was based on rail delivery of coal from the St. Johns River Coal Terminal to the St. Johns River Power Park. The requested revision to the permit will replace the railcar system with a 3.2 mile overland, fully enclosed conveyor system to transfer coal to the Power Park and additional coal blending capability within the existing Power Park coal stockyard. The requested revision will result in a projected decrease of 0.10 pound per hour of particulate matter.

Any person may submit written comments regarding this proposed permit revision. All comments must be received not later than 30 days from the date of this notice in order to be considered. A public hearing may be held if sufficient justification is provided, as determined by the Administrator. Letters should be addressed to:

Mr. C. H. Fancy, P.E.
State of Florida Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Affiant further says that the said The Florida Times-Union and Jacksonville Journal are each newspapers published at Jacksonville, in said Duval County, Florida, and that the said newspapers have each heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, and Jacksonville Journal each day except Sundays, and each has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me this 28th day of July A.D. 19 86

Notary Public,
State of Florida at Large.

My Commission Expires NOTARY PUBLIC, STATE OF FLORIDA
My commission expires Feb. 19, 1989

DA 444

C. Fancy

JACKSONVILLE ELECTRIC AUTHORITY
P. O. BOX 53015
233 W. DUVAL STREET
JACKSONVILLE, FL 32201

SJRCTENV 86-32

July 17, 1986

st. johns river POWER PARK

Mr. Hamilton S. Oven, Jr., P.E.
Administrator
Siting Coordination Section
Fla. Dept. of Env. Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

DER

JUL 21 1986

BAQM

Dear Mr. Oven:

Subject: Jacksonville Electric Authority
St. Johns River Coal Terminal
Response to BESD Letter

The Jacksonville Electric Authority (JEA) has received a copy of the Bio-Environmental Services Division (BESD) letter dated July 1, 1986, concerning the modification of the St. Johns River Coal Terminal's PSD permit. The purpose of this letter is to discuss BESD's comments, many of which JEA feels are based on information which has been taken out of context and are therefore not representative of expected operating conditions at the coal unloader and conveyor system. Listed below are JEA's responses to BESD's comments.

1. BESD supports the design change from rail coal conveying to an enclosed belt conveyor.

JEA appreciates BESD's support of the conveyor design. JEA maintains that the transport of coal by an enclosed conveyor represents an improved design, resulting in reduced environmental impacts over the original rail transport design.

2. Dust control on the ship unloader

JEA shares BESD's concern for potential deposition on the import car facilities; however, BESD's statement that emissions at the ship unloading point would be over 330% of the original value is based on an analysis taken out of context. It is true that the emissions from the ship unloading point will increase; however, in absolute terms, BESD has compared two very small numbers. The increase at the ship unloading point is from approximately 0.3 lb/hr to 1.0 lb/hr. In addition, a major point which seems to have been overlooked by BESD is that the current design modification will in fact result in a significant decrease in particulate emissions on Blount Island of approximately 5.1 lb/hr, not a "substantial increase" as indicated by BESD.

(CONT.)

JEA proposes to use wet dust suppression in addition to containment to meet the emission limits presented in the PSD modification. The vendor supplying the ship unloader (which will include the particulate control equipment) will be required per his contract to guarantee that the 10% opacity standard will be met.

3. Separate BACT determinations

The total emissions resulting from the modification of the PSD permit results in a net decrease in particulate emissions. Thus, re-addressing BACT (Best Available Control Technology) is not warranted by the proposed PSD modification.

4. Lower the visible emission standard

BESD asserts without supporting information that the visible emission standard should be reduced from 10% to 5% opacity. The initial licensing process for the Power Park and the coal unloading facility established a 10% standard. During this licensing process, analyses were conducted to determine the effect on ambient air quality and appropriate standards were set by the agencies. Since that time, ambient particulate levels have improved in Duval County resulting in a reduction in the size of the particulate non-attainment area. For this reason, there has been an increase in the distance between the non-attainment area boundary and the project site. This improvement along with the fact that the total emissions are slightly less than the original PSD permit levels would seem to justify the current 10% opacity level.

5. Installation and operation of deposition monitoring station

BESD has recommended that JEA install a particulate deposition monitor on Blount Island. In light of the proposed impact reduction in particulate emissions, JEA does not feel that a deposition monitoring program is necessary as part of the PSD permit. If this program is deemed necessary for some other regulatory purpose, JEA would be willing to discuss this matter further.

(CONT.)

If you have any questions or require any additional information, please feel free to contact me at (904) 633-4517.

Very truly yours,

Richard Breitmoser, P.E.
Division Chief
Research & Environmental
Affairs Division

RB/AJT/lwr

cc: Royce Lyles, JEA
Bill Stewart, DER
Clair Fancy, DER
Henry Colson, JPA
Paul deMariano, JPA
Bruce Miller, EPA
Ted Bisterfeld, EPA
Mike Branden, EPA
Ed Svec, FDER

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

July 16, 1986

Mr. Mike Brandon
Air Programs Branch
U.S. EPA - Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Brandon:

Re: Revision of PSD-FL-010, JEA Coal Conveyor

In response to our telephone conversation, I am sending you a copy of the public notice that the Jacksonville Electric Authority will be publishing for their proposed revision to the coal handling facility at the St. Johns River Power Park. I will forward a copy of the proof of publication when we receive it.

I also have enclosed a copy of a letter from JEA concerning when the wet suppression system would be utilized. We recommended that this information be incorporated into your review and be included as a permit specific condition.

If you have any questions or need additional information, please call me at (904)488-1344.

Sincerely,

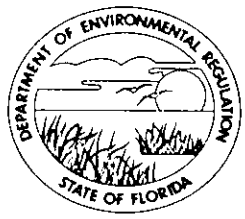
Edward J. Svec
Review Engineer
Bureau of Air Quality
Management

ES/ks

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

July 16, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Athena Tsengas
Research and Environmental
Affairs Division
Jacksonville Electrical Authority
Post Office Box 53015
Jacksonville, Florida 32201

Dear Ms. Tsengas:

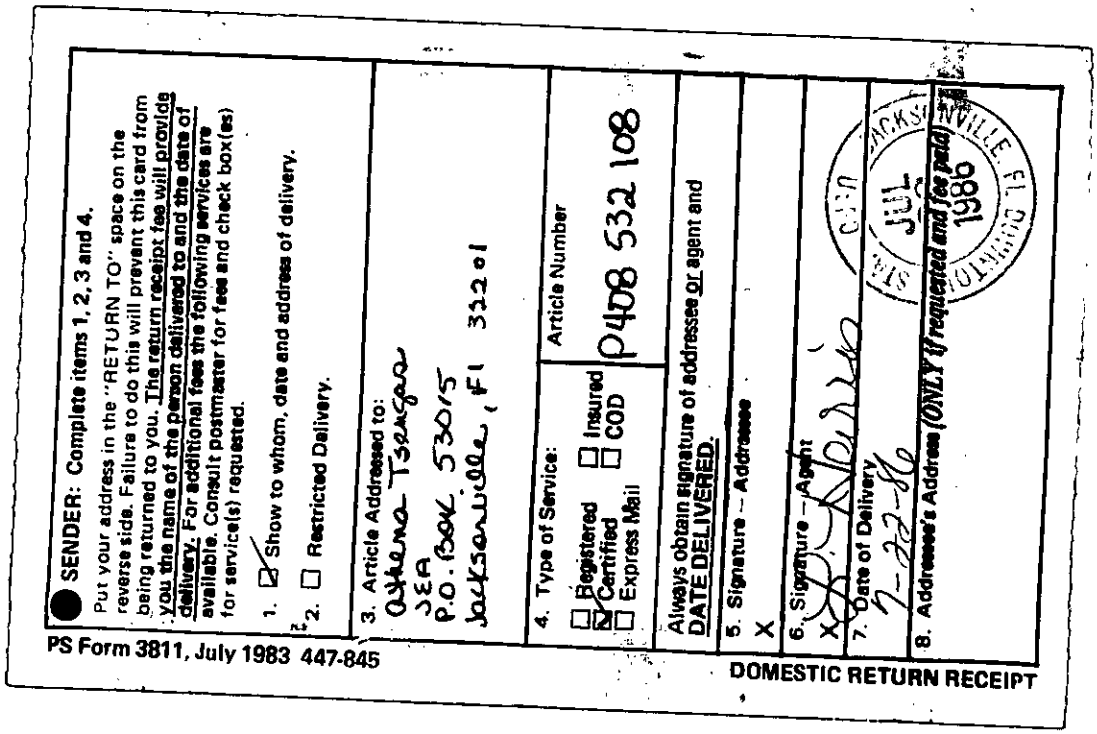
Attached is a public notice for the proposed revision to your federal permit PSD-FL-010. The notice must be published one time in a newspaper of general circulation servicing the area near the St. Johns River Coal terminal. When the notice appears in the newspaper, please forward a copy to me so we may continue to process your request.

If you have any questions, please feel free to call me at (904)488-1344 or write to me at the above address.

Sincerely,

Edward Svec
Review Engineer
Bureau of Air Quality
Management

ES/ks



SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☑ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:
Athena Tsengas
JEA
P.O. Box 53015
Jacksonville, Fl 32201

4. Type of Service:
☐ Registered ☐ Insured
☑ Certified ☐ COD
☐ Express Mail

Article Number
P408 532 108

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature – Addressee
X

6. Signature – Agent
X

7. Date of Delivery
7-22-86

8. Addressee's Address (ONLY if requested and fee paid)

JUL 1986

PS Form 3811, July 1983 447-845

DOMESTIC RETURN RECEIPT

P 408 532 108

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Athena Tsengas	
Street and No. JEA - P.O. Box 53015	
P.O., State and ZIP Code Jacksonville, Fl 32201	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date	

PS Form 3800, Feb. 1982

JACKSONVILLE ELECTRIC AUTHORITY
P. O. BOX 53015
233 W. DUVAL STREET
JACKSONVILLE, FL 32201

SJRCTENV 86-30

June 27, 1986

DER
JUL 3 1986
BAQM

st. johns river POWER PARK

Mr. Ed Svec
Environmental Specialist
Stationary Source Control Group
Fla. Dept. of Env. Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Dear Mr. Svec:

Re: Jacksonville Electric Authority (JEA)
St. Johns River Coal Terminal
Operation of Wet Suppression System

On June 6, 1986 a meeting was held with you, Mr. David Atkin (Soros Associates) and Ms. Athena Tsengas (JEA) to discuss the air emission aspects of the St. Johns River Coal Terminal (SJRCT). During the discussions you brought out that the PSD permit condition for the type of emission presently in this project would require that the wet suppression system be utilized whenever coal is handled. However, it was discussed that some coal may arrive wet and would not generate dust during handling. Thus, adding water to the already wet coal would only reduce the heating value of the coal without any effect on emissions. Therefore, it was recommended that JEA propose some type of operational procedure which would ensure that the 10% opacity limit would be met while enabling JEA to determine whether or not wet suppression should be utilized.

The following operational procedure was discussed with you in a telephone conversation with D. Atkin and A. Tsengas on June 20, 1986:

> "An observation will be conducted by the unloading facility shift supervisor at the beginning of the vessel unloading consisting of 2 or 3 lifts of coal to determine if wet suppression is required. The shift supervisor will be responsible for monitoring dust emissions during the entire unloading process. If visible emissions are observed at the bucket discharge to the ship unloader hopper, the shift supervisor will direct the wet suppression system, including sprays at conveyor transfers, to be activated. Activation of the system shall result in compliance with the 10% opacity standard."

Please note that we are not proposing any change to the 10% opacity standard for the emmision sources.

The job description for the SJRCT shift supervisor will include the language stated above.

(CONT.)

JEA therefore proposes this operating procedure, in lieu of a permit requirement which would require the activation of the wet suppression system at all times when coal is being handled, regardless of the presence or absence of dust emissions.

If you have any questions or require further information, please contact Ms. Athena Tsengas at (904) 633-4517.

Very truly yours,

Richard Breitmoser, P.E.
Division Chief
Research & Environmental
Affairs Division

RB/AJT/lwr

cc: H.S. Oven (FDER)

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services Division
Air and Water Pollution Control

July 1, 1986

Mr. Hamilton S. Oven, Jr., P.E.
Administrator
Siting Coordination Section
Department of Environmental Regulation
2600 Blair Stone Road
Twin Towers Office Bldg.
Tallahassee, Florida 32301

Re: Jacksonville Electric Authority
St. John River Power Park
Coal Unloading Facility
Coal Conveyor System
PSD Permit No. PSD FL-10

Dear Mr. Oven:

The Bio-Environmental Services Division (BESD) provides the following comments on the proposed revision to the coal unloading operation at the referenced facility:

(1) BESD supports the design change from rail coal conveying to an enclosed belt conveyor.

(2) The proposed controlled emission rate at the ship unloading point (two grab buckets) is over 330% of the original value. This increase of particulate emissions at this point of the coal handling process is of particular concern to this agency, from the standpoint of particulate deposition. Blount Island, the site of the coal unloading operation, is the terminal where thousands of vehicles are imported into the country on an annual basis. During the past few years numerous episodes of material deposition affecting these vehicles have occurred, resulting in damage worth thousands of dollars to the importers and the possible consequence of relocation of the import operation itself to another area.

The proposed changes do not result in a net significant emission increase from the entire coal handling process; however, substantial increase is being proposed at the ship unloading area and this may result in adverse deposition rates at the import car facilities.

The BESD has therefore concluded that BACT for the ship unloading area is not the wet suppression method of control (as proposed) but is in fact the dry dust control method (i.e. capture and evacuation to a bag house) which is in the current certification and PSD permit.

(3) It is noted that the ship unloading operation is approximately 5000 feet from the coal storage areas at the power park. BACT determination should therefore be made separately for each of the following areas:

(A) Ship unloading operation
(B) Coal conveyor system
(C) Coal handling and storage at the power park.

(4) The visible emission standard of 10% opacity (DER Condition of Certification 1.A) should be changed to 5% opacity.

(5) The permit should require the installation and continuous operation of a particulate deposition monitor at Blount Island in the close vicinity of the unloading operation.

Your consideration of the above is appreciated.

If BESD may be of further assistance, please advise.

Very truly yours,

Khurshid K. Mehta, P.E.
Pollution Control Engineer

KKM/ecr

cc: Mr. Bill Stewart, P.E., DER
Mr. Clair Fancy, P.E., DER
Mr. Richard Breitmoser, P.E., JEA
Mr. Henry Colson, JPA
Mr. Bruce Miller, EPA
Nissan
World Cars
Hobelmann
BESD File 1710 A

State of Florida

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee			
To: Clair Fancy	Loctn.: BAQM		
To:	Loctn.:		
To:	Loctn.:		
From:	Date:		

Ed Svec 5/5
Please review, with Barry, I would like to sign off before going to Buck. (I know you are busy)
Clair

DER
MAY 1 1986
BAQM

TO: Power Plant Siting Review Committee

FROM: H.S. Oven, Jr HSO

DATE April 30, 1986

SUBJECT: JEA St Johns River Power Park Coal Conveyor PA 81-13.

Please review the attached amendment to the JEA Power Plant Siting Application. Please send me any request for addition information by May 23, 1986. I will need final comment, field report and recommendation by July 10, 1986.

HSOjr/dh

Call Mike Brandon when decision is made
(404) 347-~~4104~~ 4233

H6 - Rev 7/76