Mitchell, Bruce

From: Gianazza, N. Bert [GianNB@jea.com]
Sent: Thursday, June 19, 2003 2:03 PM
To: Mitchell, Bruce
Subject: NGS CT Biennial stack testing

Bruce,

The permit renewal application for Northside is being sent out from the B&V offices in Kansas City today by overnight delivery, and I didn't put anything in the application about the CT testing. The testing is required to be performed by 9/30/03, but we expect to have it done by the end of July. I'll email you when we have submitted the stack test results.

Let me know if you need me to send you a letter on this as a supplement to the application or what have you.

Tx, B.

Mitchell, Bruce

From: Gianazza, N. Bert [GianNB@jea.com]

Sent: Thursday, June 19, 2003 3:45 PM

To: Mitchell, Bruce; Holtom, Jonathan

Subject: Directions to NGS for July 2nd.

Coming from Tallahassee to Jacksonville on I-10.

Exit onto I-295 North. After 10 miles or so, you'll see signs for I-95.

Continue past I-95. At about this time I-295 will turn into 9A.

Go past Main Street and Alta exits (there is one or two other exits as well)
(you'll start seeing the very distinguished and good-looking NGS and SJRPP sky-lines on your left)

About 7 or 8 miles after passing I-95, you'll see signs for the Heckscher Drive exit which is also the Blount Island exit.
You'll have to exit to your right and go (take the car) to the light. Turn left onto Heckscher Drive (towards Blount Island).

Go through the two lights (wait until they're green).
Less than a half mile down on your left, you'll see the Northside station entrance. Take it.

Please call me around 10:00 and/or when you're approaching the plant, and I'll meet you at the gate.
(I'll be at the plant around 9:30 or so.)

Take care, Bert

My cell phone number is **904-502-8980**
My pager number is **904-442-6225** (press "1", your number, and "#". Or you can listen to the boring instructions.)

21 West Church Street
Jacksonville, FL 32202-3139

May 7, 2003

JEA

Mr. James L. Mannning, P.E.
Division Chief
Air and Water Quality Division
Regulatory and Environmental Services Dept.
117 West Duval Street, Suite 225
Jacksonville, Florida 32202-4111

Dear Mr. Manning:

RE: Northside Generating Station (NGS) Units 1 and 2
Construction Permit No. 0310045-003-AC (PSD-FL-265)

Please be advised that no trucking of coal from SJRPP to NGS was performed since the coal shipment to NGS was received in time.

JEA appreciates RESD's expeditious handling of our request to allow burning the SJRPP coal with added chemical dust suppressant in NGS Units 1 and 2 on a one-time emergency basis.

To avoid this situation in the future, the use of chemical dust suppressants will be added to the NGS Title V permit.

If you have any questions with regard to this matter, please call me at 665-6247.

Sincerely,

N. Bert Gianazza, P.E.
Environmental Services

cc: Steve Pace, P.E., RESD
Richard Robinson, P.E., RESD

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

February 6, 2002

CERTIFIED MAIL - Return Receipt Requested

Mr. Walter P. Bussells
Managing Director & CEO
JEA
21 West Church Street, Tower 8
Jacksonville, Florida 32202-3139

Re: Alternative Solid Fuel Handling Scenario
JEA Northside Generating Station/St. Johns River Power Park
03/10045-009-AC, PSD-FL-265

Dear Mr. Bussells:

The Department has evaluated the January 7, 2002 submittal regarding the above referenced proposed alternative solid fuel handling scenario. The scenario would provide JEA with a limited capability to use dump trucks to transport solid fuel (coal and petroleum coke) between the respective solid fuel handling facilities at the Northside Generating Station (NGS) and the adjacent St. Johns River Power Park (SJRPP). The scenario would be used in the event of equipment failure, fuel delivery disruption and emergencies. It would also be used when there is a disproportionate fuel inventory or to facilitate performance testing.

The adjacent plants comprise a single "Major Source of Air Pollution" or "Title V Source" pursuant to Rule 62-210.200, Florida Administrative Code (F.A.C.), Definitions. The combined facility received its initial Title V operation permit on October 18, 1998, and became effective on January 1, 1999.

Since the projected PM and PM_{10} emissions increases are much less than the significant emissions rates of 25 and 15 TPY contained in Table 212.400-2, F.A.C., the proposal is not subject to PSD new source review pursuant to Rule 62-212.400(5), F.A.C. The project is not part of a phased project subject to PSD review pursuant to Rule 62-212.400(6)(b), F.A.C. There are no specific emission limiting standards pursuant to Rule 62-204.800 and Chapter 62-296, F.A.C.

The Department has determined that the project is conditionally exempt from its air permitting requirements. This determination is based on the belief that JEA has provided reasonable assurance that any additional air pollutants caused by the proposed scenario will not be in significant quantities to contribute to air pollution problems in the state pursuant to Rule 62-4.040(1)(b), F.A.C.

The conditions of this exemption are:

A. JEA shall perform the following fugitive dust control measures to reduce particulate fugitive emissions associated with the proposed alternative solid fuel transfer scenario:

1. Water application to unpaved portions of the proposed solid fuel truck delivery route as necessary to control fugitive dust emissions.
2. Road surface cleaning to paved portions of the proposed solid fuel truck delivery route as necessary to control fugitive dust emissions.

3. Water application to the affected portion of the solid fuel storage pile at SJRPP prior to solid fuel truck loading operations with the front-end loader.

B. If the scope or scale of the scenario changes such that the potential emissions of PM or PM_{10} become significant, or if the scenario becomes routine, then JEA shall notify the Department's Bureau of Air Regulation and request the exemption be amended. The Department reserves the right to require an air permit for this activity based on any changes or a new request.

C. Upon the next opening of the facility's Title V operation permit, this alternative solid fuel handling scenario will be identified/designated as an "insignificant" emissions unit/activity and placed in Appendix I-1, Insignificant Emissions Units/Activities.

4. This conditional exemption will take effect 21 days from the clerking date unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes (F.S.). The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed agency action may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within twenty-one days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within twenty-one days of publication of the public notice or within twenty-one days of receipt of this notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within twenty-one 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 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 Department'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 petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact; if there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; and (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the request for conditional exemption have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

Any party to this conditional exemption 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 conditional exemption is filed with the Clerk of the Department.

A copy of the conditional exemption and accompanying materials related to the proposed agency action are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Protection, Division of Air Resources Management, Suite 23, Magnolia Courtyard, 111 South Magnolia Drive, Tallahassee, Florida 32301.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Howard L. Rhodes

Howard L. Rhodes, Director
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(850)488-0114

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF CONDITIONAL EXEMPTION and all copies were sent by certified mail* or U.S. mail before the close of business on 2/7/02 to the person(s) listed:

Walter P. Bussells, Managing Director & CEO, JEA*
Bert Gianazza, P.E., JEA
Jim Manning, P.E., Jacksonville RESD
Chris Kirts, DEP SWD
Buck Oven, DEP PPSO

Clerk Stamp

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

Victoria Gibson February 7, 2002
(Clerk) (Date)

HLR/CHF/gpd

cc: Roger Emery
Bill Goodrich
Mark Cadenhead
Jon Cheatham
Mark Loechelt
Bert Gianazza
Rusty Logan
Jackie Bennett

Orig → File

Mitchell, Bruce

From: Gianazza, N. Bert [GianNB@jea.com]
Sent: Thursday, May 15, 2003 3:20 PM
To: Arif, Syed
Cc: Wayne Tutt; Wayne Walker; Dana Brown
Subject: Repair work being performed on Northside Units 1 and 2

Syed,

Per your request, please find attached a list of projects that JEA has undertaken or plans to undertake to bring the units up to the necessary levels of reliability and environmental performance. As you may know, startup activities began for Unit 2 (the first unit to be constructed) in December of 2001, and March of 2002 for Unit 1. By September of 2002 (almost a year later), the contractor prematurely left the job site without demonstrating the performance necessary to achieve the contractual milestones of preliminary substantial completion, reliability testing, or substantial completion. This resulted in JEA assuming control of the units with operational problems such as malfunctioning equipment and other defects in the installation of the units resulting in frequent forced outages and emissions exceedances. Since that time, JEA has worked to correct those problems and is continuing to make repairs and replacements to the components necessary for the units to operate reliably and in compliance with permit conditions.

No changes are being made that enhance the permitted capacity of the units or that would result in an emissions increase. To the contrary, the repairs and replacements are being made in an effort to reduce emissions, reliably control emissions, and achieve the permitted emission rates.

It should be noted that these units are the largest circulating fluidized beds (CFBs) in the world and the largest coke fired boilers in the world. The matters requiring further evaluation and correction during this ongoing shakedown are greater in number than with smaller, more conventional units. However, they are being handled in an expeditious manner, and we would happy to discuss them more fully with you if that would be helpful.

If you have any questions, please don't hesitate to call me.

Thanks,

Bert
904-665-6247

P.S. I'll be out of the office next week, returning May 27.

WTS Number	WTS Title	WTS Scope	
2-01	Replace transport pipng	Replace horizontal run of limestone transport piping to unit one per sizing by J&J .	
2-02	Replace transport blowers	Replace complete transport blower skids with re-sized skids. Sizing to be recommended by J&J, skid design by Delta-Ducon/Gardner Denver/UCC.	
2-10	Insulate Day Bin and Hot PA Line.	Insulate Day Bin and Hot PA Line.	
4-05	Fuel silo (install rappers)	Install rappers on fuel silos to prevent flow stoppages.	
7-07	Final filter	Install redundant final filter and upgrade as required valves and valve controls around final filter and evaluate programming of final filter operation. Evaluate impact on boiler operation of final flush sequence.	
7-34	Replace AQCS Diapham Valves	Replace AQCS Diaphram Valves	
13-05	Rotary valve motor gearbox change	Replace gearboxes and motors (7.5 hp) with chain tension adjustability. Drive will have to be changed out also. VFD's, gearbox ($5k), motor all located in local panel May be able to move these over to limestone and save cost on 1-8.	

REGULATORY & ENVIRONMENTAL SERVICES DEPARTMENT

Air and Water Quality Division

May 2, 2003

Mr. N. Bert Gianazza, P.E.
Environmental Services
JEA
21 West Church Street
Jacksonville, FL 32202-3139

Re: Duval County - Air Pollution
Temporary Burning of Coal with Dust Suppressant
Northside Generating Station Units 1 and 2
Permit Number: 0310045-003-AC (PSD-FL-265)

Dear Mr. Gianazza:

The City of Jacksonville, Regulatory and Environmental Services Department, Air and Water Quality Division (AWQD) has reviewed JEA's request, dated May 2, 2003, to temporarily burn coal which has had a chemical dust suppressant added. It is our understanding that this coal will be trucked from the SJRPP and has already been approved for burning in the SJRPP combustion units by FDEP.

After consulting with FDEP/DARM/BAR concerning your request, AWQD approves the temporary burning of this coal in the Northside CFBs for the time period of May 2, 2003 to May 6, 2003. JEA shall maintain compliance with all applicable requirements of the existing air pollution source construction permit (0310045-003-AC). JEA shall submit a written report to AWQD no later than May 9, 2003, regarding; the amount of coal that has burned in each of the CFBs, time period this coal was burned, the fuel blend, number of truck loads and amount of coal trucked. A modification to the PSD permit will be necessary if JEA wants to burn coal treated with chemical dust suppressants in the Northside Generating Station Units 1 and 2 in the future.

Should you have any questions concerning this matter, please contact Mr. Richard L. Robinson, P.E. at (904) 630-4900.

Very truly yours,

James L. Manning, P.E.
Division Chief

JLM/RLR/rmp

c: Mr. Chris Kirts, P.E., FDEP, Northeast District
Mr. Syed Arif, FDEP, DARM, Tallahassee
AWQD File 0045-K
AWQD Air Permitting File

S:\PermitV\PV2003\TVPD\0310045-003pd-AC

117 West Duval Street, Suite 225
Jacksonville, Florida 32202
Fax (904) 630-3638

Air Quality 630-4900
Water Quality 630-3404
Ground Water 630-4900
Hazardous Materials 630-3404

21 West Church Street
Jacksonville, Florida 32202-3139

May 7, 2003

JEA

Mr. James L. Mannning, P.E.
Division Chief
Air and Water Quality Division
Regulatory and Environmental Services Dept.
117 West Duval Street, Suite 225
Jacksonville, Florida 32202-4111

Dear Mr. Manning:

RE: Northside Generating Station (NGS) Units 1 and 2
Construction Permit No. 0310045-003-AC (PSD-FL-265)

Please be advised that no trucking of coal from SJRPP to NGS was performed since the coal shipment to NGS was received in time.

JEA appreciates RESD's expeditious handling of our request to allow burning the SJRPP coal with added chemical dust suppressant in NGS Units 1 and 2 on a one-time emergency basis.

To avoid this situation in the future, the use of chemical dust suppressants will be added to the NGS Title V permit.

If you have any questions with regard to this matter, please call me at 665-6247.

Sincerely,

N. Bert Gianazza, P.E.
Environmental Services

cc: Steve Pace, P.E., RESD
Richard Robinson, P.E., RESD

21 West Church Street
Jacksonville, Florida 32202-3139

May 2, 2003

Mr. James L. Mannning, P.E.
Division Chief
Air and Water Quality Division
Regulatory and Environmental Services Dept.
117 West Duval Street, Suite 225
Jacksonville, Florida 32202-4111

Dear Mr. Manning:

ELECTRIC

WATER

SEWER

RE: Northside Generating Station Units 1 and 2
Construction Permit No. 0310045-003-AC (PSD-FL-265)

JEA requests approval to burn coal which has had a chemical dust suppressant added in the above referenced units on a one-time emergency basis due to a delay in receiving a shipment of coal. A summary of the events leading to this situation is provided in the attached e-mail dated May 1, 2003.

These units are currently operating on a blend of 85% pet coke and 15% coal. Coal is needed for reliability due to plugging problems resulting in extended shut down periods associated with burning 100% pet coke.

This coal has been approved for use in the SJRPP units per the attached correspondences between SJRPP and FDEP. The fuel conforms to all permit requirements and fuel specifications pertaining to the Northside CFBs, and will have no discernable adverse effects on emissions from these units. The coal will be trucked as needed from SJRPP to NGS. It is noted that trucking of fuel in this manner was previously permitted as an insignificant activity, and records of the number of truck loads and tons of fuel moved will be maintained.

A written report of the amount of this fuel that was burned in each of the units, over what time period, and at what fuel blend of coal and pet coke, along with any other pertinent information will be submitted to RESD by no later than May 9, 2003.

If you have any questions with regard to this matter, please call me at 665-6247.

Sincerely,

N. Bert Gianazza, P.E.
Environmental Services

Enclosures

cc: Steve Pace, P.E., RESD
Richard Robinson, P.E., RESD

Gianazza, N. Bert

From: Killingsworth, Jessica Z.

Sent: Thursday, May 01, 2003 1:26 PM

To: Gianazza, N. Bert

Cc: Myers, Jim T.

Subject: Low coal inventory

As you requested, below you will find a brief description of the series of events that lead to a low coal inventory.

There were a series of events which led to the current low inventory level of coal. It started with an unplanned outage of unit 1 back in March which left the domes with little additional storage space. Unfortunately, JEA was already in agreement to take a shipment of petcoke by the end of March which then left no storage space for an early April delivery of coal (and then only other alternative given by the supplier was early May). After expressing an interest in an April 24-May 1 delivery to our coal supplier on March 31, a delivery for April 30 was set up. As the month progressed, the blend of fuel in both CFB units changed. In both instances the percentages of coal were raised which left the coal inventory lower than originally forecasted on March 31. The detrimental hit to the inventory came with news received on April 28 when it was learned that the vessel scheduled to bring the coal was held up five days in unloading its current cargo of sugar, due to rain.

Thank you,
Jessica Killingsworth
JEA Fuels Technician
(904) 665-8236
T-11

EV102201

October 22, 2001

Florida Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road.
Tallahassee, Fl 32399-2400

Attention: C. H. Fancy, P.E.; Chief

RE: Northside Generating Station/St. Johns River Power Park
Title V Permit # 0310045-002-AV
SJRPP Conditions of Certification PA 81-13
St. Johns River Power Park (SJRPP) PSD-FL-010D
Latex Binder as Dust Suppressant

Dear Mr. Fancy:

We are in receipt of your attached October 1, 2001 authorization letter for utilization of the latex binder Covol 298-1 to be applied to coal transported and/or applied at St. Johns River Power Park (SJRPP). Your letter stated that it was the understanding that this material would be used instead of the previously approved latex binder – Latex DL 298NA, which has been renamed Covol 298.

Please note that it was not our intention to utilize Covol 298-1 instead of Latex DL 298NA (Covol 298). SJRPP was requesting to utilize the Covol 298-1 in addition to Latex DL 298NA (Covol 298).

Please advise if there is any issue regarding the approval and utilization of both Covol 298 and Covol 298-1 for SJRPP. Please contact me at (904) 665-8729 if you have any questions.

Sincerely,

Jay Worley
SJRPP Group Leader

cc: Jonathan Holtom, P.E., FDEP
H. Oven, P.E., FDEP
S. Pace, P.E., RESD AWQD

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

October 1, 2001

Mr. Jay Worley
SJRPP Group Leader
Jacksonville Electric Authority
11201 New Berlin Road
Jacksonville, Florida 32226

Re: Recognition of Latex Binder as a Dust Suppressant

Dear Mr. Worley,

We have received your request to begin using a new formulation of latex binder (COVOL 298-1, made by DOW Chemical Company) on your coal as a means of suppressing fugitive dust. It is our understanding that this material will be used instead of the latex binder (Latex DL 298NA, made by DOW Chemical Company) that was previously approved on September 20, 2000, and that you will no longer be using, the Latex DL 298NA.

It is our opinion that this particular material is nearly identical to the previously approved Latex DL 298NA and falls within the classification of "chemical dust suppressant" that is authorized by your Title V permit (see Facility-wide condition II.9., and Appendix TV-3, condition 57.). For inspection purposes, please retain on-site a copy of the material safety data sheet (MSDS), a copy of your contract with the coal supplier specifying the material that will be applied to your coal, and a certification from the supplier accompanying each delivery that attests that this is the only material that has been applied to your coal. If the supplier changes the material, you must inform the Department and receive approval prior to combusting the new product.

Under the provisions of Rule 62-297.310(7)(b), F.A.C., if, at any time, the Department has reason to believe that any of your emission limits are not being met (i.e. increased particulate matter, etc.), it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

Should you have any questions regarding this matter, please contact Jonathan Holtom, P.E., at (850) 921-9531, or write to me at the above letter head address.

Sincerely,

C.H. Fancy, P.E.
Chief
Bureau of Air Regulation

cc: Buck Oven, P.E., DEP
James Manning, P.E., RESD

EV092501

September 25, 2001

Florida Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Fl 32399-2400

Attention: C. H. Fancy, P.E.; Chief

RE: Northside Generating Station/St. Johns River Power Park
Title V Permit # 0310045-002-AV
SJRPP Conditions of Certification PA 81-13
St. Johns River Power Park (SJRPP) PSD-FL-010D
Latex Binder as Dust Suppressant

Dear Mr. Fancy:

The Department in its September 20, 2000 letter (Attachment A) recognized the use of a latex binder as a chemical dust suppressant under the Facility-Wide Conditions (Condition II.9. Appendix TV-3, Condition 57). The latex material identified in the letter is manufactured by Dow Chemical Company and was identified as Latex DL 298NA. According to the Department's letter, if the supplier changes the material, the Department must be informed and approval received prior to combusting the new material. This correspondence present's information related to a minor change in the latex formulation made by the manufacturer.

The manufacturer Dow Chemical Company has enhanced the latex binder with the addition of minor amounts of acrylate and acetate polymers. The primary component of the material is still the carboxylated styrene butadiene polymer. The new formulation is designated as COVOL 298-1 and the MSDS sheet for this formulation is attached (Attachment B). The previous designation by Dow Chemical Company of Latex DL 298NA has been changed to COVOL 298. Therefore, the new formulation COVOL 289-1 reflects the addition of the new minor components to the previous formulation. The MSDS sheets for Latex DL 298NA, which is now COVOL 298 are also attached (Attachment C). A comparison of the MSDS sheets for Latex DL 298NA and COVOL 298 show that they are identical.

The acrylate and acetate polymers are similar to the previous formulation in these polymers are made up of the same elements as carboxylated styrene butadiene polymer, i.e., carbon, hydrogen and oxygen. The general formula for acrylate is H_2C:CHCOOH and the general formula for acetate is

$(CH_3COO)_2$. A comparison of the MSDS sheets for the previous formulation (Latex DL 298NA or COVOL 298) show that the composition, description, and physical and chemical properties are substantially identical to the new formulation (COVOL 298-1). This can be seen by comparing the physical and chemical properties of the previous formulation to the new formulation as listed in Item 9 of the MSDS sheets. The combustion products of the new formulation would not be different from the previous formulation given that there is no change of the elements within the polymer (i.e., carbon, hydrogen and oxygen). In addition, there is no change in the amount of the new formulation that is applied to the coal.

Your expeditious review and approval of the new formulation is appreciated. Please contact me at (904) 665-8729 if you have any questions.

Sincerely,

Jay Worley
SJRPP Group Leader

Enclosures

cc: Jonathan Holtom, P.E., FDEP
H. Oven, P.E., FDEP
S. Pace, P.E., RESD AWQD

ATTACHMENT A

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

September 20, 2000

Mr. Jay Worley
SJRPP Group Leader
Jacksonville Electric Authority
11201 New Berlin Road
Jacksonville, Florida 32226

Re: Recognition of Latex Binder as a Dust Suppressant

Dear Mr. Worley,

We have received your request to begin using a latex binder on your coal as a means of suppressing fugitive dust (Latex DL 298NA, made by DOW Chemical Company). We have also received a certification from your Professional Engineer detailing the lack of detrimental environmental effects resulting from the use of this product.

It is our opinion that this particular material falls within the classification of "chemical dust suppressant" that is authorized by your Title V permit (see Facility-wide condition II.9., and Appendix TV-3, condition 57.). For inspection purposes, please retain on-site a copy of the material safety data sheet (MSDS), a copy of your contract with the coal supplier specifying the material that will be applied to your coal, and a certification from the supplier accompanying each delivery that attests that this is the only material that has been applied to your coal. If the supplier changes the material, you must inform the Department and receive approval prior to combusting the new product.

Under the provisions of Rule 62-297.310(7)(b), F.A.C., if, at any time, the Department has reason to believe that any of your emission limits are not being met (i.e. increased particulate matter, etc.), it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

Should you have any questions regarding this matter, please contact Jonathan Holtom, P.E., at (850) 921-9531, or write to me at the above letter head address.

Sincerely,

C.H. Fancy, P.E.
Chief
Bureau of Air Regulation

cc: Kennard Kosky, P.E., Golder Associates
Buck Oven, P.E., DEP
James Manning, P.E., RESD

ATTACHMENT B

MATERIAL SAFETY DATA SHEET

1. CHEMICAL PRODUCT & COMPANY IDENTIFICATION

24-HOUR EMERGENCY PHONE NUMBER: 989-636-4400

Product: COVOL 298-1

Product Code: 88220

Effective Date: 07/04/01 Date Printed: 07/05/01 MSD: 007085

The Dow Chemical Company, Midland, MI 48674

Customer Information Center: 800-258-2436

2. COMPOSITION/INFORMATION ON INGREDIENTS

Proprietary Carboxylated Styrene/Butadiene/ Acrylate/Acetate Polymer		40-62%
Water	CAS# 007732-18-5	38-60%

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

* Milky white liquid emulsion. Slight odor. Dike and contain spills.
* Avoid dilution of spills.

POTENTIAL HEALTH EFFECTS (See Section 11 for toxicological data.)

EYE: May cause moderate irritation. May cause slight corneal injury. Vapors or mists may cause eye irritation.

SKIN: Short single exposure not likely to cause significant skin irritation. Prolonged or repeated exposure may cause slight skin irritation. Material may stick to skin causing irritation upon removal. A single prolonged exposure is not likely to result in the material being absorbed through skin in harmful amounts.

INGESTION: Single dose oral toxicity is considered to be extremely low. No hazards anticipated from swallowing small amounts incidental to normal handling operations.

INHALATION: Excessive exposure may cause irritation to upper respiratory tract (nose and throat) and lungs.

SYSTEMIC (OTHER TARGET ORGAN) EFFECTS: No relevant information found.

CANCER INFORMATION: No relevant information found.

(Continued on Page 2)

Product Name: COVOL 298-1
Product Code: 88220

Effective Date: 07/04/01 Date Printed: 07/05/01 MSD: 007085

---

3. HAZARDS IDENTIFICATION (CONTINUED)

TERATOLOGY (BIRTH DEFECTS): No relevant information found.

REPRODUCTIVE EFFECTS: No relevant information found.

4. FIRST AID

EYE: Flush eyes thoroughly with water for several minutes. Remove contact lenses after the initial 1-2 minutes and continue flushing for several additional minutes.

SKIN: Wash off in flowing water or shower.

INGESTION: No adverse effects anticipated by this route of exposure incidental to proper industrial handling.

INHALATION: Remove to fresh air if effects occur. Consult a physician.

NOTE TO PHYSICIAN: No specific antidote. Supportive care. Treatment based on judgment of the physician in response to reactions of the patient.

5. FIRE FIGHTING MEASURES

FLAMMABLE PROPERTIES:
FLASH POINT: Not applicable.
METHOD USED: Not applicable.
AUTOIGNITION TEMPERATURE: Not applicable.

FLAMMABILITY LIMITS:
LFL: Not applicable.
UFL: Not applicable.

HAZARDOUS COMBUSTION PRODUCTS: Under fire conditions some components of this product may decompose. The smoke may contain unidentified toxic and/or irritating compounds. Hazardous combustion products may include and are not limited to organic compounds, carbon dioxide, carbon monoxide and dense smoke.

OTHER FLAMMABILITY INFORMATION: This material will not burn until the water has evaporated. Residue can burn. Upon burning the product generates dense black smoke.

EXTINGUISHING MEDIA: To extinguish combustible residues of this

(Continued on Page 3)

5. FIRE FIGHTING MEASURES (CONTINUED)

product use water fog, carbon dioxide, dry chemical, or foam.

FIRE FIGHTING INSTRUCTIONS: Keep people away. Isolate fire area and deny unnecessary entry. To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical, or foam.

PROTECTIVE EQUIPMENT FOR FIRE FIGHTERS: Wear positive-pressure self-contained breathing apparatus (SCBA) and protective fire fighting clothing (includes fire fighting helmet, coat, pants, boots, and gloves). If protective equipment is not available or not used, fight fire from protected location or safe distance.

6. ACCIDENTAL RELEASE MEASURES (See Section 15 for Regulatory Information)

PROTECT PEOPLE: Use appropriate safety equipment. For additional information, refer to Section 8, Exposure Controls/Personal Protection.

PROTECT THE ENVIRONMENT: Contain liquid to prevent contamination of soil, surface water or ground water.

CLEANUP: Recover and recycle spilled latex if possible, otherwise collect with absorbent material and transfer to appropriate containers for disposal. Water may be used for final cleaning of affected area.

7. HANDLING AND STORAGE

HANDLING: Practice reasonable care to avoid repeated, prolonged skin contact.

STORAGE: Store between 40F and 110F. May coagulate if frozen at 32F, 0C. Material may develop bacteria odor on long-term storage. No safety problems known.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS: Good general ventilation should be sufficient for most conditions. Local exhaust ventilation may be necessary for some operations.

PERSONAL PROTECTIVE EQUIPMENT

(Continued on Page 4)

Product Name: COVCL 298-1
Product Code: 88220

Effective Date: 07/04/01 Date Printed: 07/05/01 MSD: 007085

---

8. EXPOSURE CONTROLS/PERSONAL PROTECTION (CONTINUED)

EYE/FACE PROTECTION: Use chemical goggles. If vapor exposure causes eye discomfort, use a full-face respirator.

SKIN PROTECTION: Wear clean, long-sleeved, body-covering clothing. Use gloves impervious to this material.

RESPIRATORY PROTECTION: If respiratory irritation is experienced, use an approved air-purifying respirator.

EXPOSURE GUIDELINES: None established.

9. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE: Milky white liquid emulsion.
ODOR: Slight odor.
VAPOR PRESSURE: 17.5 mmHg @ 20C
VAPOR DENSITY: (air = 1) 0.62
BOILING POINT: 212F, 100C
SOLUBILITY IN WATER: Latex as sold is dilutable. Polymer component is insoluble.
SPECIFIC GRAVITY: Not determined

10. STABILITY AND REACTIVITY

CHEMICAL STABILITY: Stable under recommended storage conditions. See storage section.

CONDITIONS TO AVOID: May coagulate if frozen. The dry resin is combustible.

INCOMPATIBILITY WITH OTHER MATERIALS: Addition of chemicals, such as acids or multivalent metal salts, may cause coagulation.

HAZARDOUS DECOMPOSITION PRODUCTS: Hazardous decomposition products depend upon temperature, air supply and the presence of other materials.

HAZARDOUS POLYMERIZATION: Will not occur.

11. TOXICOLOGICAL INFORMATION (See Section 3 for Potential Health

(Continued on Page 5)

Effects. For detailed toxicological data, write or call the address or non-emergency number shown in Section 1)

SKIN: The dermal LD50 has not been determined.

INGESTION: Single dose oral LD50 has not been determined.

MUTAGENICITY: No relevant information found.

12. ECOLOGICAL INFORMATION (For detailed Ecological data, write or call the address or non-emergency number shown in Section 1)

ENVIRONMENTAL FATE

MOVEMENT & PARTITIONING: No bioconcentration of the polymeric component is expected because of its high molecular weight. Latex dispersions will color water a milky white.

DEGRADATION & PERSISTENCE: The polymeric component is not expected to biodegrade.

ECOTOXICITY: Material is practically non-toxic to aquatic organisms on an acute basis (LC50/EC50 >100 mg/L in most sensitive species).

13. DISPOSAL CONSIDERATIONS (See Section 15 for Regulatory Information)

DISPOSAL METHOD: DO NOT DUMP INTO ANY SEWERS, ON THE GROUND, OR INTO ANY BODY OF WATER. All disposal methods must be in compliance with all Federal, State/Provincial and local laws and regulations. Regulations may vary in different locations. Waste characterizations and compliance with applicable laws are the responsibility solely of the waste generator.

THE DOW CHEMICAL COMPANY HAS NO CONTROL OVER THE MANAGEMENT PRACTICES OR MANUFACTURING PROCESSES OF PARTIES HANDLING OR USING THIS MATERIAL. THE INFORMATION PRESENTED HERE PERTAINS ONLY TO THE PRODUCT AS SHIPPED IN ITS INTENDED CONDITION AS DESCRIBED IN SECTION 2 (Composition/Information On Ingredients).

FOR UNUSED OR UNCONTAMINATED PRODUCT, the preferred options include sending to a licensed, permitted recycler, reclaimer, incinerator or other thermal destruction device.

As a service to its customers, Dow can provide names of information resources to help identify waste management companies and other facilities which recycle, reprocess

(Continued on Page 6)

Product Name: COVOL 298-1
Product Code: 66220

Effective Date: 07/04/01 Date Printed: 07/05/01 MSD: 007085

---

13. DISPOSAL CONSIDERATIONS (See Section 15 for Regulatory Information)

or manage chemicals or plastics, and that manage used drums. Telephone Dow's Customer Information Center at 800-258-2436 or 989-832-1556 for further details.

14. TRANSPORT INFORMATION

DEPARTMENT OF TRANSPORTATION (D.O.T.): This product is not regulated by D.O.T. when shipped domestically by land.

15. REGULATORY INFORMATION (Not meant to be all-inclusive--selected regulations represented)

NOTICE: The information herein is presented in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied is given. Regulatory requirements are subject to change and may differ from one location to another; it is the buyer's responsibility to ensure that its activities comply with federal, state or provincial, and local laws. The following specific information is made for the purpose of complying with numerous federal, state or provincial, and local laws and regulations. See other sections for health and safety information.

U.S. REGULATIONS

SARA 313 INFORMATION: To the best of our knowledge, this product contains no chemical subject to SARA Title III Section 313 supplier notification requirements.

SARA HAZARD CATEGORY: This product has been reviewed according to the EPA "Hazard Categories" promulgated under Sections 311 and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

Not to have met any hazard category

CALIFORNIA PROPOSITION 65: The following statement is made in order to comply with the California Safe Drinking Water and Toxic Enforcement Act of 1986:

(Continued on Page 7)

Product Name: COVOL 298-1
Product Code: 86220

Effective Date: 07/04/01 Date Printed: 07/05/01 MSD: 007085

REGULATORY INFORMATION: (CONTINUED)

This product contains a chemical(s) known to the State of California to cause cancer.

STATE RIGHT-TO-KNOW: This product is not known to contain any substances subject to the disclosure requirements of

New Jersey
Pennsylvania

OSHA HAZARD COMMUNICATION STANDARD:

This product is not a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

16. OTHER INFORMATION

MSDS STATUS: Revised Section 2 (added compositional ranges).

ATTACHMENT C

1. CHEMICAL PRODUCT & COMPANY IDENTIFICATION

24-HOUR EMERGENCY PHONE NUMBER: 517-636-4400

Product: LATEX DL 298NA

Product Code: 61584

Effective Date: 01/07/99 Date Printed: 02/29/00 MSD: 005213

The Dow Chemical Company, Midland, MI 48674

Customer Information Center: 800-258-2436

2. COMPOSITION/INFORMATION ON INGREDIENTS

Proprietary carboxylated styrene/ butadiene polymer		40-62%
Water	CAS# 007732-18-5	38-60%

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

****

* Milky white liquid emulsion. Slight odor. No significant immediate *
* hazards for emergency response are known. Dike and contain spills. *
* Avoid dilution of spills. *

****

POTENTIAL HEALTH EFFECTS (See Section 11 for toxicological data.)

EYE: May cause slight transient (temporary) eye irritation. Corneal injury is unlikely.

SKIN: Short single exposure not likely to cause significant skin irritation. Prolonged or repeated exposure may cause slight skin irritation. Material may stick to skin causing irritation upon removal. A single prolonged exposure is not likely to result in the material being absorbed through the skin in harmful amounts.

INGESTION: Single dose oral toxicity is considered to be extremely low. No hazards anticipated from swallowing small amounts incidental to normal handling operations.

INHALATION: Single exposure to vapors is not likely to be hazardous.

(Continued on Page 2)

Product: LATEX DL 298NA
Product Code: 61584

Effective Date: 01/07/99 Date Printed: 02/29/00 MSD: 005213

---

3. HAZARDS IDENTIFICATION (CONTINUED)

SYSTEMIC & OTHER EFFECTS: No relevant information found.

CANCER INFORMATION: No relevant information found.

TERATOLOGY (BIRTH DEFECTS): No relevant information found.

REPRODUCTIVE EFFECTS: No relevant information found.

4. FIRST AID

EYES: Flush eyes with plenty of water.

SKIN: Wash off in flowing water or shower.

INGESTION: If swallowed, seek medical attention. Do not induce vomiting unless directed to do so by medical personnel.

INHALATION: Remove to fresh air if effects occur. Consult a physician.

NOTE TO PHYSICIAN: No specific antidote. Supportive care. Treatment based on judgment of the physician in response to reactions of the patient.

5. FIRE FIGHTING MEASURES

FLAMMABLE PROPERTIES:
FLASH POINT: Not applicable
METHOD USED: Not applicable
AUTOIGNITION TEMPERATURE: Not applicable

FLAMMABILITY LIMITS:
LFL: Not applicable
UFL: Not applicable

HAZARDOUS COMBUSTION PRODUCTS: Under fire conditions some components of this product may decompose. The smoke may contain unidentified toxic and/or irritating compounds. Hazardous combustion products may include and are not limited to hydrocarbons, carbon monoxide and dense smoke.

(Continued on Page 3)

---

5. FIRE FIGHTING MEASURES (CONTINUED)

OTHER FLAMMABILITY INFORMATION: This material will not burn until the water has evaporated. Residue can burn.

EXTINGUISHING MEDIA: To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical or foam.

FIRE FIGHTING INSTRUCTIONS: Keep people away. Isolate fire area and deny unnecessary entry. To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical or foam.

PROTECTIVE EQUIPMENT FOR FIRE-FIGHTERS: Wear positive-pressure, self-contained breathing apparatus (SCBA) and protective fire fighting clothing (includes fire fighting helmet, coat, pants, boots, and gloves). If protective equipment is not available or not used, fight fire from a protected location or safe distance.

6. ACCIDENTAL RELEASE MEASURES (See Section 15 for Regulatory Information)

PROTECT PEOPLE: Avoid contact with eyes and skin.

PROTECT THE ENVIRONMENT: Contain material to prevent contamination of soil, surface water or ground water.

CLEANUP: Recover and recycle spilled latex if possible, otherwise collect with absorbent material and transfer to appropriate containers for disposal. Water may be used for final cleaning of affected area.

7. HANDLING AND STORAGE

HANDLING: Practice reasonable care to avoid repeated, prolonged skin contact. Addition of chemicals may cause coagulation.

STORAGE: Store at temperatures between 40F and 110F. May coagulate if frozen at 32F, 0C. Material may develop bacteria odor on long-term storage. No safety problems known.

(Continued on Page 4)

Product: LATEX DL 298NA
Product Code: 61584

Effective Date: 01/07/99 Date Printed: 02/29/00 MSD: 005213

---

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS: Good general ventilation should be sufficient for most conditions. Local exhaust ventilation may be necessary for some operations.

PERSONAL PROTECTIVE EQUIPMENT
EYE/FACE PROTECTION: Use safety glasses.

SKIN PROTECTION: Wear clean, long-sleeved, body-covering clothing. Use gloves impervious to this material.

RESPIRATORY PROTECTION: No respiratory protection should be needed.

EXPOSURE GUIDELINE(S): None established.

9. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE: Milky white liquid emulsion.
ODOR: Slight odor.
VAPOR PRESSURE: 17.5 mmHg @ 20C
VAPOR DENSITY: 0.624 @ 80F
BOILING POINT: 212F, 100C
SOLUBILITY IN WATER: Latex as sold is dilutable. Polymer component is insoluble.
SPECIFIC GRAVITY: .980 - 1.040

The physical data listed are for a series of latexes. For specific properties on any given latex, see the product bulletin.

10. STABILITY AND REACTIVITY

CHEMICAL STABILITY: Stable under recommended storage conditions. See storage section.

CONDITIONS TO AVOID: Active ingredient decomposes at elevated temperatures. Product can decompose at elevated temperatures.

INCOMPATIBILITY WITH OTHER MATERIALS: None known.

HAZARDOUS DECOMPOSITION PRODUCTS: Hazardous decomposition products depend upon temperature, air supply and the presence

(Continued on Page 5)

10. STABILITY AND REACTIVITY (CONTINUED)

of other materials.

HAZARDOUS POLYMERIZATION: Will not occur.

11. TOXICOLOGICAL INFORMATION (See Section 3 for Potential Health Effects. For detailed toxicological data, write or call the address or non-emergency number shown in Section 1)

SKIN: The dermal LD50 has not been determined.

INGESTION: The oral LD50 for rats is > 5000mg/kg for similar materials.

MUTAGENICITY: No relevant information found.

12. ECOLOGICAL INFORMATION (For detailed Ecological data, write or call the address or non-emergency number shown in Section 1)

ENVIRONMENTAL FATE

MOVEMENT & PARTITIONING: No bioconcentration of the polymeric component is expected because of its high molecular weight. Latex dispersions will color water a milky white.

DEGRADATION & TRANSFORMATION: The polymeric component is not expected to biodegrade.

ECOTOXICOLOGY: Material is practically non-toxic to aquatic organisms on an acute basis (LC50 greater than 100 mg/L in most sensitive species).

13. DISPOSAL CONSIDERATIONS (See Section 15 for Regulatory Information)

DISPOSAL METHOD: DO NOT DUMP INTO ANY SEWERS, ON THE GROUND, OR INTO ANY BODY OF WATER. All disposal methods must be in compliance with all Federal, State/Provincial and local laws and regulations. Regulations may vary in different locations. Waste characterizations and compliance with applicable laws are the responsibility solely of the waste generator.

THE DOW CHEMICAL COMPANY HAS NO CONTROL OVER THE MANAGEMENT

(Continued on Page 6)

DISPOSAL CONSIDERATIONS: (CONTINUED)

PRACTICES OR MANUFACTURING PROCESSES OF PARTIES HANDLING OR USING THIS MATERIAL. THE INFORMATION PRESENTED HERE PERTAINS ONLY TO THE PRODUCT AS SHIPPED IN ITS INTENDED CONDITION AS DESCRIBED IN SECTION 2 (Composition/Information On Ingredients).

FOR UNUSED OR UNCONTAMINATED PRODUCT, the preferred options include sending to a licensed, permitted recycler, reclaimer, incinerator or other thermal destruction device.

As a service to its customers, Dow can provide names of information resources to help identify waste management companies and other facilities which recycle, reprocess or manage chemicals or plastics, and that manage used drums. Telephone Dow's Customer Information Center at 800-258-2436 or 517-832-1556 for further details.

14. TRANSPORT INFORMATION

CANADIAN TDG INFORMATION:
For TDG regulatory information, if required, consult transportation regulations, product shipping papers, or your Dow representative.

U. S. DEPARTMENT OF TRANSPORTATION (D.O.T.):
This product is not regulated by DOT when shipped domestically by land.

15. REGULATORY INFORMATION (Not meant to be all-inclusive--selected regulations represented)

NOTICE: The information herein is presented in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied is given. Regulatory requirements are subject to change and may differ from one location to another; it is the buyer's responsibility to ensure that its activities comply with federal, state or provincial, and local laws. The following specific information is made for the purpose of complying with numerous federal, state or provincial, and local laws and regulations. See other sections for health and safety information.

U.S. REGULATIONS
==========

(Continued on Page 7)

Product: LATEX DL 298NA
Product Code: 61584

Effective Date: 01/07/99 Date Printed: 02/29/00 MSD: 005213

REGULATORY INFORMATION: (CONTINUED)

SARA 313 INFORMATION: To the best of our knowledge, this product contains no chemical subject to SARA Title III Section 313 supplier notification requirements.

SARA HAZARD CATEGORY: This product has been reviewed according to the EPA "Hazard Categories" promulgated under Sections 311 and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

Not to have met any hazard category

CANADIAN REGULATIONS
==========

WHMIS INFORMATION: The Canadian Workplace Hazardous Materials Information System (WHMIS) Classification for this product is:

This product is not a "Controlled Product" under WHMIS.

16. OTHER INFORMATION

MSDS STATUS: Revised Section 13

1. CHEMICAL PRODUCT & COMPANY IDENTIFICATION

24-HOUR EMERGENCY PHONE NUMBER: 517-636-4400

Product: COVOL 298

Product Code: 82953

Effective Date: 01/07/99 Date Printed: 12/14/00 MSD: 005213

The Dow Chemical Company, Midland, MI 48674

Customer Information Center: 800-258-2436

2. COMPOSITION/INFORMATION ON INGREDIENTS

Proprietary carboxylated styrene/ butadiene polymer		40-62%
Water	CAS# 007732-18-5	38-60%

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

****

* Milky white liquid emulsion. Slight odor. No significant immediate *
* hazards for emergency response are known. Dike and contain spills. *
* Avoid dilution of spills. *

****

POTENTIAL HEALTH EFFECTS (See Section 11 for toxicological data.)

EYE: May cause slight transient (temporary) eye irritation. Corneal injury is unlikely.

SKIN: Short single ... osure not likely to cause significant skin irritation ... or repeated exposure may cause slight skin ... rial may stick to skin causing irritation ... prolonged exposure is not likely to ... being absorbed through the skin in ...

... l toxicity is considered to be ... s anticipated from swallowing ... o normal handling operations.

... to vapors is not likely to be ...

Product: COVOL 298
Product Code: 82953

Effective Date: 01/07/99 Date Printed: 12/14/00 MSD: 005213

---

3. HAZARDS IDENTIFICATION (CONTINUED)

SYSTEMIC & OTHER EFFECTS: No relevant information found.

CANCER INFORMATION: No relevant information found.

TERATOLOGY (BIRTH DEFECTS): No relevant information found.

REPRODUCTIVE EFFECTS: No relevant information found.

4. FIRST AID

EYES: Flush eyes with plenty of water.

SKIN: Wash off in flowing water or shower.

INGESTION: If swallowed, seek medical attention. Do not induce vomiting unless directed to do so by medical personnel.

INHALATION: Remove to fresh air if effects occur. Consult a physician.

NOTE TO PHYSICIAN: No specific antidote. Supportive care. Treatment based on judgment of the physician in response to reactions of the patient.

5. FIRE FIGHTING MEASURES

FLAMMABLE PROPERTIES:
FLASH POINT: Not applicable
METHOD USED: Not applicable
AUTOIGNITION TEMPERATURE: Not applicable

FLAMMABILITY LIMITS:
LFL: Not applicable
UFL: Not applicable

HAZARDOUS COMBUSTION PRODUCTS: Under fire conditions some components of this product may decompose. The smoke may contain unidentified toxic and/or irritating compounds. Hazardous combustion products may include and are not limited to hydrocarbons, carbon monoxide and dense smoke.

(Continued on Page 3)

Product: COVOL 298
Product Code: 82953

Effective Date: 01/07/99 Date Printed: 12/14/00 MSD: 005213

---

5. FIRE FIGHTING MEASURES (CONTINUED)

OTHER FLAMMABILITY INFORMATION: This material will not burn until the water has evaporated. Residue can burn.

EXTINGUISHING MEDIA: To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical or foam.

FIRE FIGHTING INSTRUCTIONS: Keep people away. Isolate fire area and deny unnecessary entry. To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical or foam.

PROTECTIVE EQUIPMENT FOR FIRE-FIGHTERS: Wear positive-pressure self-contained breathing apparatus (SCBA) and protective fire fighting clothing (includes fire fighting helmet, coat, pants, boots, and gloves). If protective equipment is not available or not used, fight fire from a protected location or safe distance.

6. ACCIDENTAL RELEASE MEASURES (See Section 15 for Regulatory Information)

PROTECT PEOPLE: Avoid contact with eyes and skin.

PROTECT THE ENVIRONMENT: Contain material to prevent contamination of soil, surface water or ground water.

CLEANUP: Recover and recycle spilled latex if possible, otherwise collect with absorbent material and transfer to appropriate containers for disposal. Water may be used for final cleaning of affected area.

7. HANDLING AND STORAGE

HANDLING: Practice reasonable care to avoid repeated, prolonged skin contact. Addition of chemicals may cause coagulation.

STORAGE: Store at temperatures between 40F and 110F. May coagulate if frozen at 32F, 0C. Material may develop bacteria odor on long-term storage. No safety problems known.

(Continued on Page 4)

Product: COVOL 298
Product Code: 82953

Effective Date: 01/07/99 Date Printed: 12/14/00 MSD: 005213

---

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS: Good general ventilation should be sufficient for most conditions. Local exhaust ventilation may be necessary for some operations.

PERSONAL PROTECTIVE EQUIPMENT
EYE/FACE PROTECTION: Use safety glasses.

SKIN PROTECTION: Wear clean, long-sleeved, body-covering clothing. Use gloves impervious to this material.

RESPIRATORY PROTECTION: No respiratory protection should be needed.

EXPOSURE GUIDELINE(S): None established.

9. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE: Milky white liquid emulsion.
ODOR: Slight odor.
VAPOR PRESSURE: 17.5 mmHg @ 20C
VAPOR DENSITY: 0.624 @ 80F
BOILING POINT: 212F, 100C
SOLUBILITY IN WATER: Latex as sold is dilutable. Polymer component is insoluble.
SPECIFIC GRAVITY: .980 - 1.040

The physical data listed are for a series of latexes. For specific properties on any given latex, see the product bulletin.

10. STABILITY AND REACTIVITY

CHEMICAL STABILITY: Stable under recommended storage conditions. See storage section.

CONDITIONS TO AVOID: Active ingredient decomposes at elevated temperatures. Product can decompose at elevated temperatures.

INCOMPATIBILITY WITH OTHER MATERIALS: None known.

HAZARDOUS DECOMPOSITION PRODUCTS: Hazardous decomposition products depend upon temperature, air supply and the presence

(Continued on Page 5)

Product: COVOL 298
Product Code: 82953

Effective Date: 01/07/99 Date Printed: 12/14/00 MSD: 005213

10. STABILITY AND REACTIVITY (CONTINUED)

of other materials.

HAZARDOUS POLYMERIZATION: Will not occur.

11. TOXICOLOGICAL INFORMATION (See Section 3 for Potential Health Effects. For detailed toxicological data, write or call the address or non-emergency number shown in Section 1)

SKIN: The dermal LD50 has not been determined.

INGESTION: The oral LD50 for rats is > 5000mg/kg for similar materials.

MUTAGENICITY: No relevant information found.

12. ECOLOGICAL INFORMATION (For detailed Ecological data, write or call the address or non-emergency number shown in Section 1)

ENVIRONMENTAL FATE

MOVEMENT & PARTITIONING: No bioconcentration of the polymeric component is expected because of its high molecular weight. Latex dispersions will color water a milky white.

DEGRADATION & TRANSFORMATION: The polymeric component is not expected to biodegrade.

ECOTOXICOLOGY: Material is practically non-toxic to aquatic organisms on an acute basis (LC50 greater than 100 mg/L in most sensitive species).

13. DISPOSAL CONSIDERATIONS (See Section 15 for Regulatory Information)

DISPOSAL METHOD: DO NOT DUMP INTO ANY SEWERS, ON THE GROUND, OR INTO ANY BODY OF WATER. All disposal methods must be in compliance with all Federal, State/Provincial and local laws and regulations. Regulations may vary in different locations. Waste characterizations and compliance with applicable laws are the responsibility solely of the waste generator.

THE DOW CHEMICAL COMPANY HAS NO CONTROL OVER THE MANAGEMENT

(Continued on Page 6)

Product: COVOL 298
Product Code: 82953

Effective Date: 01/07/99 Date Printed: 12/14/00 MSD: 005213

DISPOSAL CONSIDERATIONS: (CONTINUED)

PRACTICES OR MANUFACTURING PROCESSES OF PARTIES HANDLING OR USING THIS MATERIAL. THE INFORMATION PRESENTED HERE PERTAINS ONLY TO THE PRODUCT AS SHIPPED IN ITS INTENDED CONDITION AS DESCRIBED IN SECTION 2 (Composition/Information On Ingredients).

FOR UNUSED OR UNCONTAMINATED PRODUCT, the preferred options include sending to a licensed, permitted recycler, reclaimer, incinerator or other thermal destruction device.

As a service to its customers, Dow can provide names of information resources to help identify waste management companies and other facilities which recycle, reprocess or manage chemicals or plastics, and that manage used drums. Telephone Dow's Customer Information Center at 800-258-2436 or 517-832-1556 for further details.

14. TRANSPORT INFORMATION

CANADIAN TDG INFORMATION:
For TDG regulatory information, if required, consult transportation regulations, product shipping papers, or your Dow representative.

U. S. DEPARTMENT OF TRANSPORTATION (D.O.T.):
This product is not regulated by DOT when shipped domestically by land.

15. REGULATORY INFORMATION (Not meant to be all-inclusive--selected regulations represented)

NOTICE: The information herein is presented in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied is given. Regulatory requirements are subject to change and may differ from one location to another; it is the buyer's responsibility to ensure that its activities comply with federal, state or provincial, and local laws. The following specific information is made for the purpose of complying with numerous federal, state or provincial, and local laws and regulations. See other sections for health and safety information.

U.S. REGULATIONS

(Continued on Page 7)

Product: COVOL 298
Product Code: 82953

Effective Date: 01/07/99 Date Printed: 12/14/00 MSD: 005213

REGULATORY INFORMATION: (CONTINUED)

SARA 313 INFORMATION: To the best of our knowledge, this product contains no chemical subject to SARA Title III Section 313 supplier notification requirements.

SARA HAZARD CATEGORY: This product has been reviewed according to the EPA "Hazard Categories" promulgated under Sections 311 and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

Not to have met any hazard category

CANADIAN REGULATIONS

WHMIS INFORMATION: The Canadian Workplace Hazardous Materials Information System (WHMIS) Classification for this product is:

This product is not a "Controlled Product" under WHMIS.

16. OTHER INFORMATION

MSDS STATUS: Revised Section 13

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

September 20, 2000

Mr. Jay Worley
SJRPP Group Leader
Jacksonville Electric Authority
11201 New Berlin Road
Jacksonville, Florida 32226

Re: Recognition of Latex Binder as a Dust Suppressant

Dear Mr. Worley,

We have received your request to begin using a latex binder on your coal as a means of suppressing fugitive dust (Latex DL 298NA, made by DOW Chemical Company). We have also received a certification from your Professional Engineer detailing the lack of detrimental environmental effects resulting from the use of this product.

It is our opinion that this particular material falls within the classification of "chemical dust suppressant" that is authorized by your Title V permit (see Facility-wide condition II.9., and Appendix TV-3, condition 57.). For inspection purposes, please retain on-site a copy of the material safety data sheet (MSDS), a copy of your contract with the coal supplier specifying the material that will be applied to your coal, and a certification from the supplier accompanying each delivery that attests that this is the only material that has been applied to your coal. If the supplier changes the material, you must inform the Department and receive approval prior to combusting the new product.

Under the provisions of Rule 62-297.310(7)(b), F.A.C., if, at any time, the Department has reason to believe that any of your emission limits are not being met (i.e. increased particulate matter, etc.), it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

Should you have any questions regarding this matter, please contact Jonathan Holtom, P.E., at (850) 921-9531, or write to me at the above letter head address.

Sincerely,

C.H. Fancy, P.E.
Chief
Bureau of Air Regulation

cc: Kennard Kosky, P.E., Golder Associates
Buck Oven, P.E., DEP
James Manning, P.E., RESD

F.L - SJRPP

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603

Golder Associates

September 18, 2000

983-7561

Florida Department of Environmental Protection
Title V Section; Bureau of Air Regulation (BAR)
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Fl 32399-2400

Attention: Mr. C.H. Fancy, P.E.

RE: Northside Generating Station/St. Johns River Power Park (SJRPP)
Title V Permit # 0310045-002-AV
SJRPP Conditions of Certification PA 81-13
St. Johns River Power Park PSD-FL-010D
Application of Dust Suppressant - Disclosure

Dear Clair:

St. Johns River Power Park has notified the Department of the use of coal sprayed with a latex binder. As discussed with Mr. Jonathan Holtom of BAR, the Department would like a certification from a professional engineer regarding the use of the latex material as fugitive dust control and provide additional information on several areas. The additional information requested included the potential for VOC emissions from the latex covering, the combustion products, and the potential of other environmental affects of the coal with latex.

The latex material, as provided in the MSDS sheet (Latex DL 298NA), is proprietary polymer (40 to 62 percent) and water (38 to 60 percent). The polymer is characterized as proprietary carboxylated styrene/butadiene polymer. This latex material, when applied as a coating is very similar to styrene-butadiene rubber (SBR). SBR is the most widely used type of synthetic rubber polymer and is used in a wide variety of products including coatings. The material is very similar to latex paints, which are emulsions of SBR, polyvinyl acetate and acrylic resins. Latex DL 298 NA, however, does not contain any pigments, and the polymer is primarily made up of carbon and hydrogen. The term "carboxylated" refers to carbonyl (=C=O) and a hydroxyl group (-OH) bonded to a carbon atom. When used with coal, the latex serves as an ideal binder, since SBR has unique properties of deformation (elongation or yield under stress). As such, the latex acts to minimize emissions of fugitive dust during transfer and handling. The application of the latex mixture is uniform throughout the coal making up 0.2 percent. Thus, the characteristics of minimizing fugitive dust are throughout the coal and not just on the surface. This will minimize fugitive dust during all handling operations.

When applied, there would be a negligible amount of VOCs emitted, since the polymer is suspended in a water emulsion and will be applied offsite. Even if applied on-site, the VOC emissions would be negligible given that the latex formula is applied in a very dilute form (9 parts water to 1 part latex).

The coal with the small amount of latex would not change the emission characteristics of the SJRPP units. This is based on the contents of the latex, the small amount of latex with the coal and the uniform distribution of the latex material. The latex polymer consists primarily of carbon and hydrogen, since SBR has a formula of $C_{12}H_{14}$ with minor amounts of oxygen. The amount of latex is low at 0.1 percent solids in the coal and is uniformly distributed throughout the coal. The coal is pulverized, further mixing the small amounts of latex. Combustion temperatures in excess of 2,000 degrees F would completely break down the latex to carbon dioxide and water.

In the letter to the Department from Mr. Jay Worley, an MSDS sheet was included for another dust suppressant product referred to as "Dust Ban 7823 Liquid" manufactured by Nalco Chemical. This was included as an example of the dust suppressants available on the market that are made primarily of a polymer material. This material is currently used to minimize fugitive dust at a coal-fired power plant in Virginia, for which I conducted some consulting services. It should be noted that the latex to be used for the SJRPP coal does not contain any alcohol or light distillate compounds.

The use of the latex material as a means to control fugitive dusts at SJRPP is authorized by Specific Condition III. E.3. of the Final Title V permit and is referenced in Subsection E of the Final Title V Permit for the coal storage yard and transfer system. Rule 62-296.320(4)(c)3.c. F.A.C. allows the use of "chemical or other dust suppressants to ... open stock piles and similar activities". The PSD approval (PSD-FL-010D) also allows the use of chemical agents for particulate control. Review of EPA documents clearly indicates that latex is an available control technology for fugitive dust control.

After application, the latex material would not cause any surface runoff issues as the polymer is insoluble and is bound to the coal. Even if sprayed at the plant site, there would be no runoff from the latex. Once dried, the polymer would be insoluble and, as stated above, bound to the coal.

Please call if you have any further questions. I can be reached at (352) 336-5600 ext. 516.

Sincerely,

GOLDER ASSOCIATES INC.

Kennard F. Kosky, P.E.
Principal
Professional Engineer No. 14996

SEAL

Enclosures

cc: Jay Worley, SJRPP Group Leader
Jonathan Holtom, P.E., FDEP Title V Section
Syed Arif, P.E., FDEP New Source Review
H. Oven, FDEP
S. Pace, RESD AWQD

Document1

August 17, 2000

Mr. Clair Fancy
Florida Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
MS 5505
Tallahassee, Fl 32399-2400

RE: Northside Generating Station/St. Johns River Power Park (SJRPP)
Title V Permit # 0310045-002-AV
SJRPP Conditions of Certification PA 81-13
SJRPP PSD-FL-010D
Recognition of Dust Suppressant Use

Dear Mr. Fancy:

Pursuant to an August 15, 2000 telephone conversation with Mr. Bruce Mitchell and Mr. Syed Arif of your office, the St. Johns River Power Park (SJRPP) is considering the use of coal sprayed with a latex binder. The coal will be the same coal as currently used at SJRPP. Coal from the mine will be screened and then sprayed with the latex binder prior to shipment to the plant. The amount of latex binder utilized with coal is 0.2 percent by weight with the latex portion making up 50 percent of the binder and the remainder water. Therefore, the amount of latex material is 0.1 percent by weight in the latex binder coal mixture. The latex material, as provided in the attached MSDS sheet (Latex DL 298NA), is described as a proprietary polymer (40 to 62 percent) and water (38 to 60 percent). As noted from the attached MSDS, the latex material is stable and decomposes at elevated temperatures. (Attachment A)

Latex is a broad classification that includes synthetic material made as emulsions with particle sizes ranging from 0.5 to 0.15 micron. The latex material proposed to be used consists of carbon (about 91 percent) and hydrogen (about 9 percent). While this has advantages to SJRPP from an economic standpoint, the actual physical and chemical result will minimize emissions of fugitive dust.

Latex binders are used as common dust suppressants. The Environmental Protection Agency document titled "Fugitive Dust Background Document and Technical Information Document for Best Available Control Measures" identifies latex binders as a potential control option with high control efficiencies. (Refer to

EPA-450/2-92-004, September 1992, Pages 3-28 and 3-44). A product identified as M-167 is a Dow Chemical Company latex binder. Also, please refer to Attachment B as an example of a similar dust suppressant that is used at coal fired power plants.

This type of material can currently be used at SJRPP as a control measure to reduce fugitive dust. Specific Condition III. E.3. requires the use of "control systems and control techniques established to minimize particulate matter emissions for emission units 4 through 17 in Revised Table 2". These are the emission units associated with the coal storage yard and transfer systems. Subsection E of the Title V Permit for the coal storage yard and transfer system allows the express use of "wetting agents" for fugitive dust control. This is supported by Rule 62-296.320(4)(c)3.c. F.A.C. which allows the use of "chemical or other dust suppressants to ... open stock piles and similar activities". The PSD approval (PSD-FL-010D) also allows the use of chemical agents for particulate control. SJRPP has previously used chemical dust suppressants at the plant.

Applying the latex binder at the mine will provide additional dust suppression along the transportation route and when unloading the coal. Coal, containing the binder, when placed in the storage piles, will have less fugitive emissions during handling, storage and subsequent transfer to the plant.

According to Rule 62-213.410(3) F.A.C., SJRPP is notifying the Department of implementing the use of a latex dust suppressant as a binder in the coal. Upon FDEP's concurrence, shipments of coal, with this latex dust suppressant, are anticipated to commence in September 2000. The use of the binder will not change any air pollutant emissions from the facility, except for reducing the potential of fugitive dust emissions.

Your expeditious review is appreciated. Please contact me at (904) 665-8729 if you have any questions.

Sincerely,

Jay Worley
SJRPP Group Leader

Attachments

cc: S. Arif, FDEP
B. Mitchell, FDEP
H. Oven, FDEP
S. Pace, RESD

bcc: T. Bavington, w/o attachment
L. Bradley "
B. LeMay "
A. Cobb "
P. Smith "
S. Hughes "
M. Loechelt, w/attachment
B. Gianazza "
B. Para "
K. Kosky, Golder "
SJRPP Records "

ATTACHMENT A

1. CHEMICAL PRODUCT & COMPANY IDENTIFICATION

24-HOUR EMERGENCY PHONE NUMBER: 517-636-4400

Product: LATEX DL 298NA

Product Code: 61584

Effective Date: 01/07/99 Date Printed: 02/29/00 MSD: 005213

The Dow Chemical Company, Midland, MI 48674

Customer Information Center: 800-258-2436

2. COMPOSITION/INFORMATION ON INGREDIENTS

Proprietary carboxylated styrene/ butadiene polymer		40-62%
Water	CAS# 007732-18-5	38-60%

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

****
* Milky white liquid emulsion. Slight odor. No significant immediate *
* hazards for emergency response are known. Dike and contain spills. *
* Avoid dilution of spills. *
****

POTENTIAL HEALTH EFFECTS (See Section 11 for toxicological data.)

EYE: May cause slight transient (temporary) eye irritation. Corneal injury is unlikely.

SKIN: Short single exposure not likely to cause significant skin irritation. Prolonged or repeated exposure may cause slight skin irritation. Material may stick to skin causing irritation upon removal. A single prolonged exposure is not likely to result in the material being absorbed through the skin in harmful amounts.

INGESTION: Single dose oral toxicity is considered to be extremely low. No hazards anticipated from swallowing small amounts incidental to normal handling operations.

INHALATION: Single exposure to vapors is not likely to be hazardous.

(Continued on Page 2)

---

3. HAZARDS IDENTIFICATION (CONTINUED)

SYSTEMIC & OTHER EFFECTS: No relevant information found.

CANCER INFORMATION: No relevant information found.

TERATOLOGY (BIRTH DEFECTS): No relevant information found.

REPRODUCTIVE EFFECTS: No relevant information found.

4. FIRST AID

EYES: Flush eyes with plenty of water.

SKIN: Wash off in flowing water or shower.

INGESTION: If swallowed, seek medical attention. Do not induce vomiting unless directed to do so by medical personnel.

INHALATION: Remove to fresh air if effects occur. Consult a physician.

NOTE TO PHYSICIAN: No specific antidote. Supportive care. Treatment based on judgment of the physician in response to reactions of the patient.

5. FIRE FIGHTING MEASURES

FLAMMABLE PROPERTIES:
FLASH POINT: Not applicable
METHOD USED: Not applicable
AUTOIGNITION TEMPERATURE: Not applicable

FLAMMABILITY LIMITS:
LFL: Not applicable
UFL: Not applicable

HAZARDOUS COMBUSTION PRODUCTS: Under fire conditions some components of this product may decompose. The smoke may contain unidentified toxic and/or irritating compounds. Hazardous combustion products may include and are not limited to hydrocarbons, carbon monoxide and dense smoke.

(Continued on Page 3)

---

5. FIRE FIGHTING MEASURES (CONTINUED)

OTHER FLAMMABILITY INFORMATION: This material will not burn until the water has evaporated. Residue can burn.

EXTINGUISHING MEDIA: To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical or foam.

FIRE FIGHTING INSTRUCTIONS: Keep people away. Isolate fire area and deny unnecessary entry. To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical or foam.

PROTECTIVE EQUIPMENT FOR FIRE-FIGHTERS: Wear positive-pressure, self-contained breathing apparatus (SCBA) and protective fire fighting clothing (includes fire fighting helmet, coat, pants, boots, and gloves). If protective equipment is not available or not used, fight fire from a protected location or safe distance.

6. ACCIDENTAL RELEASE MEASURES (See Section 15 for Regulatory Information)

PROTECT PEOPLE: Avoid contact with eyes and skin.

PROTECT THE ENVIRONMENT: Contain material to prevent contamination of soil, surface water or ground water.

CLEANUP: Recover and recycle spilled latex if possible, otherwise collect with absorbent material and transfer to appropriate containers for disposal. Water may be used for final cleaning of affected area.

7. HANDLING AND STORAGE

HANDLING: Practice reasonable care to avoid repeated, prolonged skin contact. Addition of chemicals may cause coagulation.

STORAGE: Store at temperatures between 40F and 110F. May coagulate if frozen at 32F, 0C. Material may develop bacteria odor on long-term storage. No safety problems known.

(Continued on Page 4)

Product: LATEX DL 298NA
Product Code: 61584

Effective Date: 01/07/99 Date Printed: 02/29/00 MSD: 005213

---

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS: Good general ventilation should be sufficient for most conditions. Local exhaust ventilation may be necessary for some operations.

PERSONAL PROTECTIVE EQUIPMENT
EYE/FACE PROTECTION: Use safety glasses.

SKIN PROTECTION: Wear clean, long-sleeved, body-covering clothing. Use gloves impervious to this material.

RESPIRATORY PROTECTION: No respiratory protection should be needed.

EXPOSURE GUIDELINE(S): None established.

9. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE: Milky white liquid emulsion.
ODOR: Slight odor.
VAPOR PRESSURE: 17.5 mmHg @ 20C
VAPOR DENSITY: 0.624 @ 80F
BOILING POINT: 212F, 100C
SOLUBILITY IN WATER: Latex as sold is dilutable. Polymer component is insoluble.
SPECIFIC GRAVITY: .980 - 1.040

The physical data listed are for a series of latexes. For specific properties on any given latex, see the product bulletin.

10. STABILITY AND REACTIVITY

CHEMICAL STABILITY: Stable under recommended storage conditions. See storage section.

CONDITIONS TO AVOID: Active ingredient decomposes at elevated temperatures. Product can decompose at elevated temperatures.

INCOMPATIBILITY WITH OTHER MATERIALS: None known.

HAZARDOUS DECOMPOSITION PRODUCTS: Hazardous decomposition products depend upon temperature, air supply and the presence

(Continued on Page 5)

Product: LATEX DL 298NA
Product Code: 61584

Effective Date: 01/07/99 Date Printed: 02/29/00 MSD: 005213

---

10. STABILITY AND REACTIVITY (CONTINUED)

of other materials.

HAZARDOUS POLYMERIZATION: Will not occur.

11. TOXICOLOGICAL INFORMATION (See Section 3 for Potential Health Effects. For detailed toxicological data, write or call the address or non-emergency number shown in Section 1)

SKIN: The dermal LD50 has not been determined.

INGESTION: The oral LD50 for rats is > 5000mg/kg for similar materials.

MUTAGENICITY: No relevant information found.

12. ECOLOGICAL INFORMATION (For detailed Ecological data, write or call the address or non-emergency number shown in Section 1)

ENVIRONMENTAL FATE

MOVEMENT & PARTITIONING: No bioconcentration of the polymeric component is expected because of its high molecular weight. Latex dispersions will color water a milky white.

DEGRADATION & TRANSFORMATION: The polymeric component is not expected to biodegrade.

ECOTOXICOLOGY: Material is practically non-toxic to aquatic organisms on an acute basis (LC50 greater than 100 mg/L in most sensitive species).

13. DISPOSAL CONSIDERATIONS (See Section 15 for Regulatory Information)

DISPOSAL METHOD: DO NOT DUMP INTO ANY SEWERS, ON THE GROUND, OR INTO ANY BODY OF WATER. All disposal methods must be in compliance with all Federal, State/Provincial and local laws and regulations. Regulations may vary in different locations. Waste characterizations and compliance with applicable laws are the responsibility solely of the waste generator.

THE DOW CHEMICAL COMPANY HAS NO CONTROL OVER THE MANAGEMENT

(Continued on Page 6)

DISPOSAL CONSIDERATIONS: (CONTINUED)

PRACTICES OR MANUFACTURING PROCESSES OF PARTIES HANDLING OR USING THIS MATERIAL. THE INFORMATION PRESENTED HERE PERTAINS ONLY TO THE PRODUCT AS SHIPPED IN ITS INTENDED CONDITION AS DESCRIBED IN SECTION 2 (Composition/Information On Ingredients).

FOR UNUSED OR UNCONTAMINATED PRODUCT, the preferred options include sending to a licensed, permitted recycler, reclaimer, incinerator or other thermal destruction device.

As a service to its customers, Dow can provide names of information resources to help identify waste management companies and other facilities which recycle, reprocess or manage chemicals or plastics, and that manage used drums. Telephone Dow's Customer Information Center at 800-258-2436 or 517-832-1556 for further details.

14. TRANSPORT INFORMATION

CANADIAN TDG INFORMATION:
For TDG regulatory information, if required, consult transportation regulations, product shipping papers, or your Dow representative.

U. S. DEPARTMENT OF TRANSPORTATION (D.O.T.):
This product is not regulated by DOT when shipped domestically by land.

15. REGULATORY INFORMATION (Not meant to be all-inclusive--selected regulations represented)

NOTICE: The information herein is presented in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied is given. Regulatory requirements are subject to change and may differ from one location to another; it is the buyer's responsibility to ensure that its activities comply with federal, state or provincial, and local laws. The following specific information is made for the purpose of complying with numerous federal, state or provincial, and local laws and regulations. See other sections for health and safety information.

U.S. REGULATIONS
==========

(Continued on Page 7)

Product: LATEX DL 298NA
Product Code: 61584

Effective Date: 01/07/99 Date Printed: 02/29/00 MSD: 005213

REGULATORY INFORMATION: (CONTINUED)

SARA 313 INFORMATION: To the best of our knowledge, this product contains no chemical subject to SARA Title III Section 313 supplier notification requirements.

SARA HAZARD CATEGORY: This product has been reviewed according to the EPA "Hazard Categories" promulgated under Sections 311 and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

Not to have met any hazard category

CANADIAN REGULATIONS
==========

WHMIS INFORMATION: The Canadian Workplace Hazardous Materials Information System (WHMIS) Classification for this product is:

This product is not a "Controlled Product" under WHMIS.

16. OTHER INFORMATION

MSDS STATUS: Revised Section 13

ATTACHMENT B

NALCO

MATERIAL SAFETY DATA

PRODUCT

DUST BAN 7823 LIQUID

Emergency Telephone Number
Medical (800) 462-5378 (24 hours) (800) 1-M-ALERT

SECTION 01 CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

TRADE NAME: DUST BAN 7823 LIQUID
DESCRIPTION: An acrylamide/acrylate polymer in a water and oil emulsion

NFPA 704M/HMIS RATING: 1/1 HEALTH 1/1 FLAMMABILITY 0/0 REACTIVITY 0 OTHER
0=Insignificant 1=Slight 2=Moderate 3=High 4=Extreme

SECTION 02 COMPOSITION AND INFORMATION ON INGREDIENTS

Our hazard evaluation has identified the following chemical ingredient(s) as hazardous under OSHA's Hazard Communication Rule, 29 CFR 1910.1200. Consult Section 15 for the nature of the hazard(s).

INGREDIENT(S)	CAS #	APPROX.%
Ethoxylated alcohol	68002-97-1	1-5
Hydrotreated light distillate	64742-47-8	20-40

SECTION 03 HAZARD IDENTIFICATION

EMERGENCY OVERVIEW:
WARNING! Causes irritation to skin and eyes. Do not get in eyes, on skin, or on clothing. Wear goggles and face shield when handling. Avoid prolonged or repeated breathing of vapor. Use with adequate ventilation. Do not take internally. Keep container closed when not in use.

Empty containers may contain residual product. Do not reuse container unless properly reconditioned.

PRIMARY ROUTE(S) OF EXPOSURE: Eye, Skin

EYE CONTACT: Can cause mild to moderate irritation.
SKIN CONTACT: Can cause mild to moderate irritation.
INHALATION: May cause irritation to the upper respiratory tract.

SYMPTOMS OF EXPOSURE:
ACUTE: Inhalation of high concentrations of hydrotreated light distillate can cause nausea, dizziness, vomiting, stupor or unconsciousness.

CHRONIC: Prolonged skin contact with product can cause dry skin and defatting resulting in irritation and dermatitis.

AGGRAVATION OF EXISTING CONDITIONS: A review of available data does not

NALCO CHEMICAL COMPANY ONE NALCO CENTER • NAPERVILLE, ILLINOIS 60563-1198
AREA (630) 305-1000

NALCO

MATERIAL SAFETY DATA

PRODUCT

DUST BAN 7823 LIQUID

Emergency Telephone Number
Medical (800) 462-5378 (24 hours) (800) I-M-ALERT

identify any worsening of existing conditions.

SECTION 04 FIRST AID INFORMATION

EYES:	Flush with water for 15 minutes. Call a physician.
SKIN:	Wash thoroughly with soap and rinse with water. Call a physician.
INGESTION:	Do not induce vomiting. Give water. Call a physician.
INHALATION:	Remove to fresh air. Treat symptoms. Call a physician.

NOTE TO PHYSICIAN: Based on the individual reactions of the patient, the physician's judgment should be used to control symptoms and clinical condition.

CAUTION: If unconscious, having trouble breathing or in convulsions, do not induce vomiting or give water.

SECTION 05 FIRE FIGHTING MEASURES

FLASH POINT: Greater than 200 Degrees F (PMCC) ASTM D-93

EXTINGUISHING MEDIA: This product would not be expected to burn unless all the water is boiled away. The remaining organics may be ignitable. Use water to cool containers exposed to fire.

UNUSUAL FIRE AND EXPLOSION HAZARD: May evolve NOx under fire conditions.

SECTION 06 ACCIDENTAL RELEASE MEASURES

IN CASE OF TRANSPORTATION ACCIDENTS, CALL THE FOLLOWING 24-HOUR TELEPHONE NUMBER (800) I-M-ALERT or (800) 462-5378.

SPILL CONTROL AND RECOVERY:

Small liquid spills: Contain with absorbent material, such as clay, soil or any commercially available absorbent. Shovel reclaimed liquid and absorbent into recovery or salvage drums for disposal. Refer to CERCLA in Section 15.

Large liquid spills: Dike to prevent further movement and reclaim into recovery or salvage drums or tank truck for disposal. Refer to CERCLA in Section 15.

SECTION 07 HANDLING AND STORAGE

NALCO CHEMICAL COMPANY ONE NALCO CENTER • NAPERVILLE, ILLINOIS 60563-1198
AREA (630) 305-1000

NALCO

MATERIAL SAFETY DATA

PRODUCT

DUST BAN 7823 LIQUID

Emergency Telephone Number
Medical (800) 462-5378 (24 hours) (800) I-M-ALERT

Storage : Keep container closed when not in use.

SECTION 08 EXPOSURE CONTROLS AND PERSONAL PROTECTION

RESPIRATORY PROTECTION: Respiratory protection is not normally needed since the volatility and toxicity are low. If significant mists are generated, use either a chemical cartridge respiratory with a dust/mist prefilter or supplied air.

For large spills, entry into large tanks, vessels or enclosed small spaces with inadequate ventilation, a positive pressure, self-contained breathing apparatus is recommended.

VENTILATION: General ventilation is recommended.

PROTECTIVE EQUIPMENT: Use impermeable gloves and chemical splash goggles when attaching feeding equipment, doing maintenance or handling product. Examples of impermeable gloves available on the market are neoprene, nitrile, PVC, natural rubber, viton and butyl (compatibility studies have not been performed).

The availability of an eye wash fountain and safety shower is recommended.

If clothing is contaminated, remove clothing and thoroughly wash the affected area. Launder contaminated clothing before reuse.

HUMAN EXPOSURE CHARACTERIZATION: Based on Nalco's recommended product application and our recommended personal protective equipment, the potential human exposure is: MODERATE.

SECTION 09 PHYSICAL AND CHEMICAL PROPERTIES

COLOR:	White, opaque	FORM:	Liquid
ODOR:	Hydrocarbon		
DENSITY:	8.4-8.9 lbs/gal.		
SPECIFIC GRAVITY:	1.01-1.05 @ 60 Degrees F		ASTM D-1298
VISCOSITY:	940 cps @ 60 Degrees F		ASTM D-2986
FREEZE POINT:	Less than -50 Degrees F		ASTM D-1177
FLASH POINT:	Greater than 200 Degrees F (PMCC)		ASTM D-93
VOLATILE ORGANIC COMPOUND (VOC):	1.87 lbs/gal.		EPA METHOD 24

NOTE: These physical properties are typical values for this product.

NALCO CHEMICAL COMPANY ONE NALCO CENTER • NAPERVILLE, ILLINOIS 60563-1198
AREA (630) 305-1000

NALCO

MATERIAL SAFETY DATA

PRODUCT

DUST BAN 7823 LIQUID

Emergency Telephone Number
Medical (800) 462-5378 (24 hours) (800) FM-ALERT

SECTION 10 STABILITY AND REACTIVITY

INCOMPATIBILITY: Avoid water contamination which may cause gelling.

Avoid contact with strong oxidizers (eg. chlorine, peroxides, chromates, nitric
acid, perchlorates, concentrated oxygen, permanganates) which can generate heat, fires, explosions and the release of toxic fumes.

THERMAL DECOMPOSITION PRODUCTS: In the event of combustion CO, CO2, NOx may be formed. Do not breathe smoke or fumes. Wear suitable protective equipment.

SECTION 11 TOXICOLOGICAL INFORMATION

TOXICITY STUDIES: Toxicity studies have not been conducted on this product, but toxicity studies of the ingredient(s) in Section 2 have been reviewed. The results are shown below.

ACUTE ORAL TOXICITY (ALBINO RATS):
Ethoxylated alcohol LD50 = 2,800 mg/kg
Hydrotreated light distillate LD50 = 40,000 mg/kg

ACUTE DERMAL TOXICITY (ALBINO RABBITS):
Ethoxylated alcohol LD50 = 1,000-3,000 mg/kg
Hydrotreated light distillate LD50 = 2,000 - 4,000 mg/kg

PRIMARY SKIN IRRITATION TEST (ALBINO RABBITS):
SKIN IRRITATION INDEX DRAIZE RATING:
4.4-5.1/8.0 Ethoxylated alcohol
5.2/8.0 Hydrotreated light distillate

PRIMARY EYE IRRITATION TEST (ALBINO RABBITS):
EYE IRRITATION INDEX DRAIZE RATING:
51-94/110 Ethoxylated alcohol
5/110.0 Hydrotreated light distillate

HUMAN HAZARD CHARACTERIZATION: Based on our hazard characterization, the potential human hazard is: LOW

SECTION 12 ECOLOGICAL INFORMATION

If released into the environment, see CERCLA in Section 15.

NALCO

MATERIAL SAFETY DATA

PRODUCT

DUST BAN 7823 LIQUID

Emergency Telephone Number
Medical (800) 462-5378 (24 hours) (800) I-M-ALERT

ENVIRONMENTAL HAZARD AND EXPOSURE CHARACTERIZATION: Based on our Hazard Characterization, the potential environmental hazard is: MODERATE. Based on Nalco's recommended product application and the product's characteristics, the potential environmental exposure is: MODERATE.

SECTION 13 DISPOSAL CONSIDERATIONS

DISPOSAL: If this product becomes a waste, it does not meet the criteria of a hazardous waste as defined under the Resource Conservation and Recovery Act (RCRA) 40 CFR 261, since it does not have the characteristics of Subpart C, nor is it listed under Subpart D.

As a non-hazardous liquid waste, it should be solidified with stabilizing agents (such as sand, fly ash, or cement) so that no free liquid remains before disposal to an industrial waste landfill. A non-hazardous liquid waste can also be incinerated in accordance with local, state and federal regulations.

SECTION 14 TRANSPORTATION INFORMATION

PROPER SHIPPING NAME/HAZARD CLASS MAY VARY BY PACKAGING, PROPERTIES, AND MODE OF TRANSPORTATION. TYPICAL PROPER SHIPPING NAMES FOR THIS PRODUCT ARE:

ALL TRANSPORTATION MODES : PRODUCT IS NOT REGULATED DURING TRANSPORTATION

SECTION 15 REGULATORY INFORMATION

The following regulations apply to this product.

FEDERAL REGULATIONS:

OSHA'S HAZARD COMMUNICATION RULE, 29 CFR 1910.1200:
Based on our hazard evaluation, the following ingredients in this product are hazardous and the reasons are shown below.

Ethoxylated alcohol - Eye/skin irritant
Hydrotreated light distillate - Skin irritant

Hydrotreated light distillate (oil mist) - TWA 5 mg/m3 ACGIH/TLV

Hydrotreated light distillate (oil mist) - TWA 5 mg/m3,

NALCO CHEMICAL COMPANY ONE NALCO CENTER • NAPERVILLE, ILLINOIS 60563-1198
AREA (630) 305-1000

NALCO

MATERIAL SAFETY DATA

PRODUCT

DUST BAN 7823 LIQUID

Emergency Telephone Number
Medical (800) 482-5378 (24 hours) (800) I-M-ALERT

STEL 10 mg/m3 OSHA/PEL

CERCLA/SUPERFUND, 40 CFR 117, 302:
Notification of spills of this product is not required.

SARA/SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986
(TITLE III) - SECTIONS 302, 311, 312 AND 313:

SECTION 302 - EXTREMELY HAZARDOUS SUBSTANCES (40 CFR 355):
This product does not contain ingredients listed in Appendix A and B as an Extremely Hazardous Substance.

SECTIONS 311 and 312 - MATERIAL SAFETY DATA SHEET REQUIREMENTS (40 CFR 370):
Our hazard evaluation has found this product to be hazardous. The product should be reported under the following EPA hazard categories:

XX Immediate (acute) health hazard
-- Delayed (chronic) health hazard
-- Fire hazard
-- Sudden release of pressure hazard
-- Reactive hazard

Under SARA 311 and 312, the EPA has established threshold quantities for the reporting of hazardous chemicals. The current thresholds are: 500 pounds or the threshold planning quantity (TPQ), whichever is lower, for extremely hazardous substances and 10,000 pounds for all other hazardous chemicals.

SECTION 313 - LIST OF TOXIC CHEMICALS (40 CFR 372):
This product does not contain ingredients on the List of Toxic Chemicals.

TOXIC SUBSTANCES CONTROL ACT (TSCA):
The chemical ingredients in this product are on the 8(b) Inventory List (40 CFR 710).

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA), 40 CFR 261 SUBPART C & D:
Consult Section 13 for RCRA classification.

FEDERAL WATER POLLUTION CONTROL ACT, CLEAN WATER ACT, 40 CFR 401.15 (formerly Sec. 307), 40 CFR 116 (formerly Sec. 311):
None of the ingredients are specifically listed.

CLEAN AIR ACT, Sec. 111 (40 CFR 60), Sec. 112 (40 CFR 61, 1990 Amendments), Sec. 611 (40 CFR 82, CLASS I and II Ozone depleting substances):
This product does not contain ingredients covered by the Clean Air Act.

NALCO CHEMICAL COMPANY ONE NALCO CENTER • NAPERVILLE, ILLINOIS 60563-1198
AREA (630) 305-1000

NALCO

MATERIAL SAFETY DATA

PRODUCT

DUST BAN 7823 LIQUID

Emergency Telephone Number
Medical (800) 482-5378 (24 hours) (800) I-M-ALERT

STATE REGULATIONS:

CALIFORNIA PROPOSITION 65:
This product does not contain any chemicals which require warning under California Proposition 65.

MICHIGAN CRITICAL MATERIALS:
This product does not contain ingredients listed on the Michigan Critical Materials Register.

STATE RIGHT TO KNOW LAWS:
The following ingredient(s) are disclosed for compliance with State Right To Know Laws:

Ethoxylated alcohol	68002-97-1
Fatty acid ester	Trade secret
Hydrotreated light distillate	64742-47-8
Polyacrylamide	Trade secret
Polyol ester	Trade secret
Water	7732-18-5

INTERNATIONAL REGULATIONS:

This is a WHMIS controlled product under The House of Commons of Canada Bill C-70 (Class D2B). The product contains the following substance(s), from the Ingredient Disclosure List or has been evaluated based on its toxicological properties, to contain the following hazardous ingredients(s):

Chemical Name	CAS #	% Concentration Range
Ethoxylated alcohol	68002-97-1	1-5
Hydrotreated light distillate	64742-47-8	20-40

SECTION 16 OTHER INFORMATION

Nalco internal 7101202

SECTION 17 RISK CHARACTERIZATION

Due to our commitment to Product Stewardship, we have evaluated the human and environmental hazards and exposures of this product. Based on our recommended use of this product, we have characterized the product's general risk. This information should provide assistance for your own risk management practices. We have evaluated our product's risk as follows:

NALCO CHEMICAL COMPANY ONE NALCO CENTER • NAPERVILLE, ILLINOIS 60563-1198
AREA (630) 305-1000

NALCO

MATERIAL SAFETY DATA

PRODUCT

DUST BAN 7823 LIQUID

Emergency Telephone Number
Medical (800) 462-5378 (24 hours) (800) I-M-ALERT

- The human risk is: LOW.
- The environmental risk is: MODERATE.

Any use inconsistent with Nalco's recommendations may affect our risk characterization. Our sales representative will assist you to determine if your product application is consistent with our recommendations. Together we can implement an appropriate risk management process.

This product material safety data sheet provides health and safety information. The product is to be used in applications consistent with our product literature. Individuals handling this product should be informed of the recommended safety precautions and should have access to this information. For any other uses, exposures should be evaluated so that appropriate handling practices and training programs can be established to insure safe workplace operations. Please consult your local sales representative for any further information.

SECTION 16 REFERENCES

Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices, American Conference of Governmental Industrial Hygienists, OH.

Hazardous Substances Data Bank, National Library of Medicine, Bethesda, Maryland (CD-ROM version), Micromedex, Inc., Englewood, CO.

IARC Monographs on the Evaluation of the Carcinogenic Risk of Chemicals to Man, Geneva: World Health Organization, International Agency for Research on Cancer.

Integrated Risk Information System, U.S. Environmental Protection Agency, Washington, D.C. (CD-ROM version), Micromedex, Inc., Englewood, CO.

Annual Report on Carcinogens, National Toxicology Program, U.S. Department of Health and Human Services, Public Health Service.

Title 29 Code of Federal Regulations, Part 1910, Subpart Z, Toxic and Hazardous Substances, Occupational Safety and Health Administration (OSHA).

Registry of Toxic Effects of Chemical Substances, National Institute for Occupational Safety and Health, Cincinnati, Ohio (CD-ROM version), Micromedex, Inc., Englewood, CO.

NALCO CHEMICAL COMPANY ONE NALCO CENTER • NAPERVILLE, ILLINOIS 60563-1198
AREA (630) 305-1000

NALCO

MATERIAL SAFETY DATA

PRODUCT

DUST BAN 7823 LIQUID

Emergency Telephone Number
Medical (800) 462-5378 (24 hours) (800) HM-ALERT

Shepard's Catalog of Teratogenic Agents (CD-ROM version), Micromedex, Inc., Englewood, CO.

Suspect Chemicals Sourcebook (a guide to industrial chemicals covered under major regulatory and advisory programs), Roytech Publications (a Division of Ariel Corporation), Bethesda, MD.

The Teratogen Information System, University of Washington, Seattle, Washington (CD-ROM version), Micromedex, Inc., Englewood, CO.

PREPARED BY: William S. Utley, PhD., DABT, Manager, Product Safety
DATE CHANGED: 02/23/1999 DATE PRINTED: 03/28/1999

NALCO CHEMICAL COMPANY ONE NALCO CENTER • NAPERVILLE, ILLINOIS 60563-1198
AREA (630) 305-1000

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

February 17, 2003

CERTIFIED MAIL – Return Receipt Requested

Mr. James M. Chansler, P.E., D.P.A.
V.P., Operations & Maintenance and Responsible Official
JEA
21 West Church Street
Jacksonville, Florida 32202

Re: Request For Additional Time to Respond to an Incompleteness Letter
Title V Air Operation Permit Revision Application
Northside Generating Station
Permit Project No.: 0310045-010-AV
Facility ID: **0310045**
Nos. 1 and 2 Circulating Fluidized Bed Boilers

Dear Mr. Chansler:

On February 11, 2003, the Department received Mr. N. Bert Gianazza's letter request for additional time to respond to an incompleteness letter dated September 18, 2002. Pursuant to Rule 62-213.420(1)(b)6.c., F.A.C., the request is acceptable and the extension is granted, which concludes on October 1, 2003, close of business.

If you have any other questions, please contact Bruce Mitchell at 850/413-9198.

Sincerely,

for Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/SMS/bm

Enclosure

cc: Scott M. Sheplak, P.E.
Richard Robinson, Duval County

21 West Church Street
Jacksonville, Florida 32202-3139

JEA

February 10, 2003

Ms. Trina L. Vielhauer
Bureau Chief
Bureau of Air Regulation
Division of Air Resources Management
ELECTRIC Florida Department of Environmental Protection
2600 Blair Stone Road
WATER Tallahassee, FL 32399-2400

RE: Northside Generating Station Units 1 and 2
SEWER Permit No. 0310045-008-AV and PSD-FL-265

Dear Ms. Vielhauer:

Per my conversation with Bruce Mitchell of your staff, please issue an extension until October 1, 2003 (the expiration date of construction permit PSD-FL-265) to respond to the Department's incompleteness letter dated September 18, 2002. This extension is needed to engineer and implement a fix to the natural gas-fired limestone dryers' particulate control system and perform the required stack-testing, and to provide other information required by the Department to process our application.

If you have any questions, please call me at (904) 665-6247.

Sincerely,

N. Bert Gianazza, P.E.
Environmental Services

cc: Scott Sheplak, P.E., FDEP
Bruce Mitchell, P.E., FDEP
Steve Pace, P.E., RESD

Mitchell, Bruce

To: robinson@coj.net
Cc: Sheplak, Scott
Subject: Incompleteness letter for JEA Northside Repowering.

2/14/03

Dear Richard,

My bad that you were not copied on the incompleteness letter for the above referenced project. Take care.

Bruce


0310045.010.Incompleteness.Let...


0310045.010.response.to.reques...

21 West Church Street
Jacksonville, Florida 32202-3139

JEA

February 10, 2003

Ms. Trina L. Vielhauer
Bureau Chief
Bureau of Air Regulation
Division of Air Resources Management
ELECTRIC Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400
WATER

RE: Northside Generating Station Units 1 and 2
SEWER Permit No. 0310045-008-AV and PSD-FL-265

Dear Ms. Vielhauer:

Per my conversation with Bruce Mitchell of your staff, please issue an extension until October 1, 2003 (the expiration date of construction permit PSD-FL-265) to respond to the Department's incompleteness letter dated September 18, 2002. This extension is needed to engineer and implement a fix to the natural gas-fired limestone dryers' particulate control system and perform the required stack-testing, and to provide other information required by the Department to process our application.

Bruce, please draft response for my signature. S.H 2/14

If you have any questions, please call me at (904) 665-6247.

Sincerely,

N. Bert Gianazza, P.E.
Environmental Services

cc: Scott Sheplak, P.E., FDEP
Bruce Mitchell, P.E., FDEP
Steve Pace, P.E., RESD