

Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

November 15, 2006

ELECTRONIC MAIL - RECEIVED RECEIPT REQUESTED

Mr. Michael J. Brost,
Vice President Electric System
JEA
21 West Church Street
Jacksonville, Florida 32202

Re: DEP File No. 0310045-017-AC
SCR Installation in Units 1 and 2
St. Johns River Power Park

Dear Mr. Brost:

The Department has received an air construction permit application on October 17, 2006, to install selective catalytic reduction (SCR) in Units 1 and 2 at the St. Johns River Power Park in Duval County. The installation of SCR is required by the Department rules implementing EPA's Clean Air Interstate Rule (CAIR). Based on our initial review of the proposed project, we have determined that additional information is needed in order to continue processing this application package. Please submit the information requested below to the Department's Bureau of Air Regulation:

1. Please provide material balance calculations for ammonia injection that will remove 90 percent of the sulfuric acid mist emissions (SAM) after the air heater. The calculations should provide the ammonia injection amount required in pounds per hour and gallons per minute to ensure that SAM emissions do not increase more than 7 tons per year above the baseline SAM emissions. These calculations should be based on when the units are operating as base load units and when operating at 50 percent load. If any actual test data is available for a similar type operation, please provide that to the Department. Also, indicate if any ammonia slip will be taking place due to ammonia injection.
2. Table 2-2 in the application indicates that SAM emissions for 2001 through 2004 were based on the average SAM emission from stack tests during the period of 1997 through 2000. SAM emissions for 2005 were based on stack test performed in 2005. Why was the stack test data for SAM emissions for 2001 through 2004 not used? If the stack tests for SAM emissions were not performed during that time period, provide the reasons to the Department as to why the stack tests were not performed.

"More Protection, Less Process"

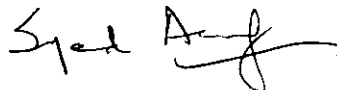
Printed on recycled paper.

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. A new certification statement by the authorized representative or responsible official must accompany any material changes to the application. Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

Please note that in accordance with Rule 62-4.055(1), "The applicant shall have **ninety days** after the Department mails a timely request for additional information to submit that information to the Department..... Failure of an applicant to provide the timely requested information by the applicable date **shall** result in denial of the application."

I will be happy to meet and discuss the details with you and your staff. If you have any questions, I can be reached at 850/921-9528.

Sincerely,



Syed Arif, P.E.
Bureau of Air regulation

/sa

cc: Gregg Worley, EPA (worley.gregg@epa.gov)
Chris Kirts, DEP-NED (christopher.kirts@dep.state.fl.us)
Richard Robinson, ERM/AQB (robinson@coj.net)
John Worley, SJRPP (worlja@jea.com)
Ken Kosky, P.E., Golder Associates (kkosky@golder.com)

Adams, Patty

From: Harvey, Mary
Sent: Wednesday, November 15, 2006 8:40 AM
To: Arif, Syed; Adams, Patty
Subject: FW: LTR/Mr. Michael J. Brost - DEP #0310045-017-AC

From: Worley, Jay A. - Supt BM Lab & Environment Comp [<mailto:WorJA@jea.com>]
Sent: Wednesday, November 15, 2006 7:42 AM
To: Harvey, Mary
Subject: Read: LTR/Mr. Michael J. Brost - DEP #0310045-017-AC

Your message

To: WorJA@jea.com
Subject:

was read on 11/15/2006 7:42 AM.

Adams, Patty

From: Harvey, Mary
Sent: Wednesday, November 15, 2006 8:42 AM
To: Adams, Patty; Arif, Syed
Subject: FW: LTR/Mr. Michael J. Brost - DEP #0310045-017-AC

From: Brost, Mike J. - VP, Electric Systems [mailto:Brosmj@jea.com]
Sent: Tuesday, November 14, 2006 3:13 PM
To: Harvey, Mary
Subject: RE: LTR/Mr. Michael J. Brost - DEP #0310045-017-AC

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Tuesday, November 14, 2006 2:02 PM
To: worley.gregg@epa.gov; Kirts, Christopher; robinson@coj.net; Worley, Jay A. - Supt BM Lab & Environment Comp; kkosky@golder.com; Brost, Mike J. - VP, Electric Systems
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
Subject: LTR/Mr. Michael J. Brost - DEP #0310045-017-AC

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

11/15/2006

Adams, Patty

From: Harvey, Mary
Sent: Tuesday, November 14, 2006 3:10 PM
To: Arif, Syed; Adams, Patty
Subject: FW: LTR/Mr. Michael J. Brost - DEP #0310045-017-AC

From: Robinson, Richard [mailto:ROBINSON@coj.net]
Sent: Tuesday, November 14, 2006 2:37 PM
To: Harvey, Mary
Subject: RE: LTR/Mr. Michael J. Brost - DEP #0310045-017-AC

I received the subject RAI letter that was attached to the e-mail below. Thanks!

Richard L. Robinson, P.E.
Environmental Engineering Manager
Air Quality Branch
Environmental Quality Division
City of Jacksonville, Florida
117 West Duval Street, Suite 225
Jacksonville, FL 32202

Phone: (904) 630-4900
Fax: (904) 630-3638
E-Mail: robinson@coj.net

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Tuesday, November 14, 2006 2:02 PM
To: worley.gregg@epa.gov; Kirts, Christopher; Robinson, Richard; worlja@jea.com; kkosky@golder.com; brosmj@jea.com
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From: Kirts, Christopher
Sent: Tuesday, November 14, 2006 3:15 PM
To: Harvey, Mary
Subject: Read: LTR/Mr. Michael J. Brost - DEP #0310045-017-AC

Your message

To: 'worley.gregg@epa.gov'; Kirts, Christopher; 'robinson@coj.net'; 'worlja@jea.com'; 'kkosky@golder.com'; 'brosmj@jea.com'
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
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12/6/2006

Adams, Patty


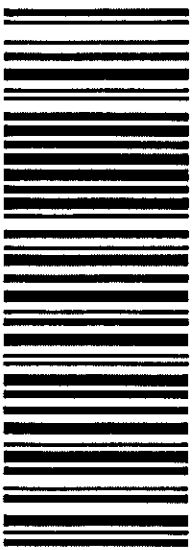
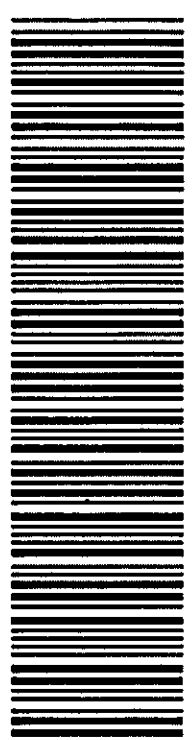
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Subject:

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		2ND		Pieces: 1/1
FM: DEP AIR RESOURCE MGMT P. Adams DIRECTOR OFFICE STE 23 111 S MAGNOLIA DR TALLAHASSEE, FL 32301 UNITED STATES Phone: 850-921-9505		ORIGIN: TLH Sender's ref: 37550201000 A7 AY235		To: CITY OF JACKSONVILLE MR. RON ROBERSON 117 W. DUVAL ST., SUITE 225 ENV. RESOURCES MGT. DEPT. JACKSONVILLE, FL 32202 UNITED STATES
Description: 0310045-017-AC application		Weight: Letter Date: 2006-11-09		POSTCODE: 32202 TEL: 904.630.4900
DHL standard terms and conditions apply.		Day 13MO		
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WAYBILL: 18677895250 (Non-Negotiable)				

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	Jacksonville, FL 32202 UNITED STATES	Weight (lbs.):	Letter
Attention To:	Mr. Ron Roberson	Dimensions:	0 x 0 x 0
Phone#:	904.630-4900	Ship Ref:	37550201000 A7 AY235
Sent By:	P. Adams	Service Level:	2nd Day (2nd business day by 5 PM)
Phone#:	850-921-9505	Special Svc:	
		Date Printed:	11/9/2006
		Bill Shipment To:	Sender
		Bill To Acct:	778941286

DHL Signature (optional) _____ Route _____ Date _____ Time _____

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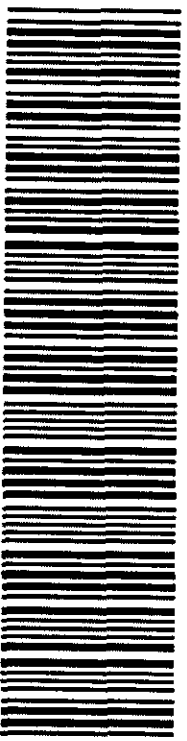
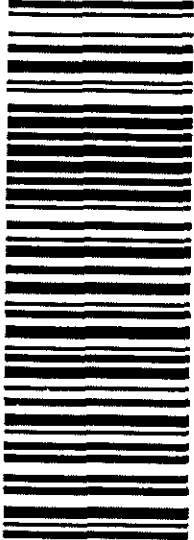
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Description: 0010087-025-AC application 0310045-017-AC applica Weight: 1 lbs for 1 pcs Date: 2006-11-09		DHL standard terms and conditions apply.		TEL: 904-807-3235
(2L)US32256		ASHX 7D FSC		Day 13MO
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SENDER'S RECEIPT
 Waybill #: 18678343456
 To(Company):
 DEP Northeast District Office
 Air Section, Suite 200B
 7825 Baymeadows Way
 Jacksonville, FL 32256
 UNITED STATES
 Attention To: Mr. Chris Kirts
 Phone#: 904-807-3235
 Sent By: P. Adams
 Phone#: 850-921-9505

Rate Estimate: 3.52
 Protection: Not Required
 Description: 0010087-025-AC application
 0310045-017-AC applica
 Weight (lbs.): 1
 Dimensions: 0 x 0 x 0
 Ship Ref: 37550201000 A7 AY235
 Service Level: 2nd Day (2nd
 business day by 5 PM)
 Special Svc:
 Date Printed: 11/9/2006
 Bill Shipment To: Sender
 Bill To Acct: 778941286

DHL Signature (optional) _____ Route _____ Date _____ Time _____

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