



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

November 28, 2000

CERTIFIED MAIL - Return Receipt Requested

Mr. Walter P. Bussells
Managing Director & CEO
Jacksonville Electric Authority
21 West Church Street
Jacksonville, Florida 32202

Re: Jacksonville Electric Authority: St. Johns River Power Park
Conditional Exemption Designation for an Emergency Generator

Dear Mr. Bussells:

The Department has evaluated the submittal received October 16, 2000, regarding the above referenced natural gas or propane fired emergency generator to be located at the above referenced facility. The natural gas or propane fired emergency generator qualifies for the exemption pursuant to Rule 62-210.300(3)(a)20., Florida Administrative Code (F.A.C.). Also, the potential pollutant emissions for the emissions unit are less than the pollutant thresholds established in Rule 62-213.430(6), F.A.C., and would qualify for "insignificant" status. The emissions unit is not subject to the Federal Acid Rain Program. In addition, the total amount of fuel for all such emergency generators within the facility will not exceed 4.4 million cubic feet per calendar year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used. Therefore, upon the next opening of the Title V operation permit, the referenced emission unit will be incorporated into Appendix I-1, List of Insignificant Emissions Units and/or Activities.

The existing facility is a "major source of air pollution" or "Title V Source" for criteria pollutants and hazardous air pollutant emissions pursuant to Rule 62-210.200, F.A.C., Definitions, and received its initial Title V operation permit on December 31, 1997, and became effective on January 1, 1998. Since the proposed contemporaneous pollutant emissions increases are much less than the significant emissions rates 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. Finally, there are no specific emission limiting standards pursuant to Rule 62-204.800 and Chapter 62-296, F.A.C.

Based on the above findings, the Department is granting a conditional exemption from the air permitting requirements of the Florida Department of Environmental Protection for the subject emergency generator. The exemption is based on the premise that any air pollutants emitted from the proposed emergency generator 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. An Emergency Generator

1. The emissions unit is not subject to the Federal Acid Rain Program.
2. The only fuels allowed to be fired are natural gas and propane.
3. The total amount of fuel for all such emergency generators within the facility shall not exceed 4.4 million cubic feet per calendar year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
4. The owner or operator(s) will account for the amount of fuel(s) fired.
5. Any records kept will be retained for a five year period and made available for Department inspection upon request.

"More Protection, Less Process"

Printed on recycled paper.

Bruce Mitchell

0310045-002

6. The emissions unit is a Onan 75 GGHF generator with a Ford Model WSG-1068 naturally aspirated 415 c.i. (6.8 L) V10 engine.

7. If the conditions on which this exemption are based change, the owner or operator shall notify the Department's Bureau of Air Regulation of the changes and request the exemption be amended.

8. Upon the next opening of the facility's Title V operation permit, this emissions unit will be identified/designated as an "insignificant" emissions unit/activity and placed into Appendix I-1, List of Insignificant Emissions Units and/or Activities.

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.

NOTICE OF APPEAL RIGHTS

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

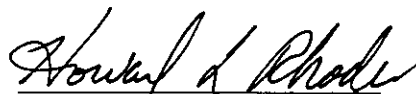
Jacksonville Electric Authority
St. Johns River Power Park
Conditional Exemption Designation for an Emergency Generator
November 28, 2000
Page 3 of 4

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, and at the Department's Northeast District Office, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



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

Jacksonville Electric Authority
St. Johns River Power Park
Conditional Exemption Designation for an Emergency Generator
November 28, 2000
Page 4 of 4

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 before the close of business on 11/29/00 to the person(s) listed:

Mr. Walter P. Bussells, Managing Director and CEO, JEA

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this NOTICE OF CONDITIONAL EXEMPTION were sent by U.S. mail on the same date to the person(s) listed, unless otherwise noted:

Mr. Chris Kirts, NED (Interoffice mail)
Mr. N. Bert Gianazza, P.E., JEA
Mr. Scott Sheplak, BAR (hand delivered)

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.

Barbara J. Friday 11/29/00
(Clerk) (Date)

HLR/CHF/bm

Enclosure

21 West Church Street
Jacksonville, Florida 32202-3139

RECEIVED

OCT 16 2000

BUREAU OF AIR REGULATION



October 10, 2000

Mr. Bruce Mitchell, P.E.
Environmental Administrator
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: St. Johns River Power Park (Title V Permit No. 0310045-002-AV)
Request for Title V Permit Revision

Dear Mr. Mitchell:

Please acknowledge by letter or permit revision a categorical exemption under FAC 62-210.300(3)(a) for the below emergency generator to be installed at SJRPP:

Mfr., make, and model: Onan 75 GGHF generator with Ford Model WSG-1068 naturally aspirated 415 c.i. (6.8 L) V10 engine.

Manufacturer recommended run time: 0.5 hr/week

Method of compliance with exemption: Records of fuel usage.

Exhaust emissions data, and the required P.E. certification and R.O. signature are enclosed.

If you have any questions with regard to this matter, please contact me at (904) 665-6247.

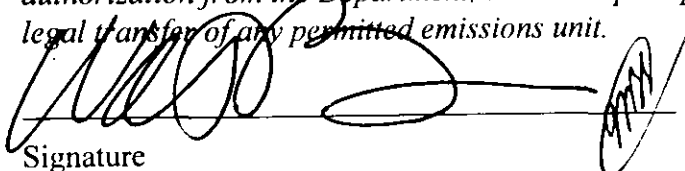
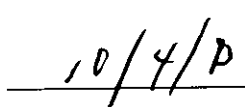
Sincerely,

A handwritten signature in black ink, appearing to read 'N. Bert Gianazza', is positioned above the typed name.

N. Bert Gianazza, P.E.
Environmental Permitting
& Compliance Group

Enclosures: As noted.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Walter P. Bussells, Managing Director and CEO
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: JEA Street Address: 21 West Church Street City: Jacksonville State: FL Zip Code: 32202
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (904) 665 - 7220 Fax: (904) 665 - 7366
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature  Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: N. Bert Gianazza Registration Number: 38640
2. Professional Engineer Mailing Address: Organization/Firm: JEA Street Address: 21 West Church Street City: Jacksonville State: FL Zip Code: 32202
3. Professional Engineer Telephone Numbers: Telephone: (904) 665 - 6247 Fax: (904) 665 - 7376

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein*, that:

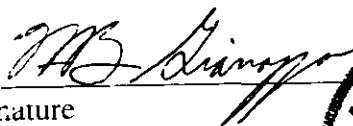
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

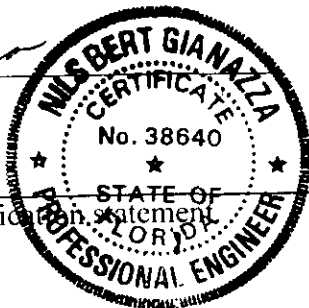
If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.


Signature

(seal)



10/4/00
Date

* Attach any exception to certification statement

665-7371



75GGHF ONAN GENERATOR SET EXHAUST EMISSION DATA SHEET

ENGINE

Model:	Ford WSG-1068	Bore:	3.55 in. (90 mm)
Type:	4 Cycle, 90°V 10 Cylinder Spark-Ignited	Stroke:	4.17 in. (106 mm)
Aspiration:	Natural	Displacement:	415 cu.in. (6.8 liters)
Compression Ratio:	9:1		
Emission Control Device:	None		

<u>PERFORMANCE DATA</u>	<u>NATURAL GAS</u>	<u>PROPANE</u>
Getset Rating @ 1800 RPM (60 Hz)	70	75
HP @ 1800 RPM (60 Hz)	112	119
Fuel Consumption (scfh)	889	363
Air to Fuel Ratio	17.3	15.8
Exhaust Gas Flow (CFM)	550	550
Exhaust Gas Temperature (°F)	1100	1100

EXHAUST EMISSION DATA

(All Values are Grams per KW-Hour)

<u>COMPONENT</u>	<u>NATURAL GAS</u>	<u>PROPANE</u>
HC (Total Unburned Hydrocarbons)	1.2	1.0
NOx (Oxides of Nitrogen as NO2)	12.9	14.2
CO (Carbon Monoxide)	10.1	4.4
PM10 (Particulate Matter)	negligible	negligible

TEST CONDITIONS

Data was recorded during steady-state rated engine speed (± 25 RPM) with rated load (± 2%). Pressures, temperatures, and emission rates were stabilized.

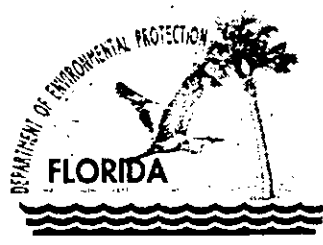
Fuel Specification:

Natural Gas:	Natural Gas as received from Supplier.
Propane	Meets the requirements for Commercial Grade Propane under the ASTM D1835 Standard Specification for Liquefied Petroleum Gases.

Intake Air Temperature:	77 ± 9 ° F
Barometric Pressure:	29.6 ± 1 in. Hg
Humidity:	NOx measurement corrected to 75 grains H2O/lb dry air

The NOx, HC, and CO emission data tabulated here were taken from a single engine under the test conditions shown above. The data are subject to instrumentation, and engine to engine variability. Engine operation with excessive air intake or exhaust restriction beyond published maximum limits, or with improper maintenance, may result in elevated emission levels.

Bruce



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.

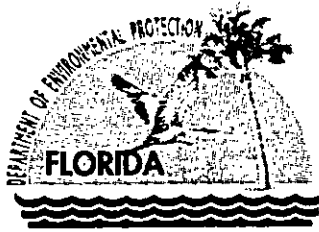
Sincerely,


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

"More Protection, Less Process"

Printed on recycled paper.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

December 22, 1999

CERTIFIED MAIL – Return Receipt Requested

Mr. Walter P. Bussels
Managing Director
Jacksonville Electric Authority
21 West Church Street
Jacksonville, Florida 32202

Re: JEA: Northside Generating Station/St. Johns River Power Park
Designation of a Proposed No. 2 Fuel Oil Fired Portable Auxiliary Boiler and an Existing Paint Spray Booth as
Insignificant Pursuant to Categorical Exemptions at Rule 62-210.300(3), F.A.C.

Dear Mr. Bussels:

The Department has evaluated the submittal regarding the above referenced portable auxiliary boiler, which will have a heat input of less than 10 MMBtu/hr, fire a No. 2 fuel oil with a sulfur content not to exceed 0.05%, by weight, and fire no more than 50,000 gallons of the No. 2 fuel oil per year. Therefore, the boiler qualifies for the categorical exemption pursuant to Rule 62-210.300(3)(a)2., Florida Administrative Code (F.A.C.). Also, the potential pollutant emissions for the emissions unit are less than the pollutant thresholds established in Rule 62-213.430(6), F.A.C., and would qualify for the portable auxiliary boiler for "insignificant" status. The designation of "insignificant" will be established as such in the Title V operation permit's Appendix I-1, Insignificant Emission Units and/or Activities, upon the next opening of the Title V operation permit. Appropriate record keeping for the No. 2 fuel oil purchased, including the fuel oil sulfur content, by weight, and No. 2 fuel oil fired during the year by the boiler shall be required in order to justify and retain the categorical exemption status. The records shall be maintained for five years.

The Department has also evaluated the submittal regarding the above referenced "existing" paint spray booth (PSB), which is located at the Northside Generating Station. The PSB is used to maintain existing equipment, such as transformers, pumps, etc. The PSB operations are a source of volatile organic compounds (VOC) emissions. The total quantity of coatings containing greater than 5.0% VOCs, by volume, used shall be less than six gallons per day, averaged monthly, and include any solvents and thinners used in the process including those used for cleanup. In addition, the PSB is not subject to the RACT regulations pursuant to Chapter 62-296, F.A.C. Therefore, the PSB qualifies for the categorical exemption pursuant to Rule 62-210.300(3)(a)23., F.A.C., and would qualify the PSB for "insignificant" status. The designation of "insignificant" will be established as such in the Title V operation permit's Appendix I-1, Insignificant Emission Units and/or Activities, upon the next opening of the Title V operation permit. Appropriate record keeping of the coatings used and their percentage of VOC content, by volume, and the solvents and thinners used in the process, including those used for cleanup, shall be required for the PSB in order to justify and retain the categorical exemption status. The records shall be maintained for five years.

The existing facility is a "major source of air pollution" or "Title V Source" for criteria pollutants and hazardous air pollutant emissions pursuant to Rule 62-210.200, Florida Administrative Code (F.A.C.), Definitions, and its initial Title V operation permit (0310045-001-AV) went final on October 13, 1998, and became effective on January 1, 1999.


"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

Jacksonville Electric Authority: Letter
Designation of a Proposed No. 2 Fuel Oil Fired Portable Auxiliary Boiler and an Existing Paint Spray Booth as
Insignificant Pursuant to Categorical Exemptions at Rule 62-210.300(3), F.A.C.
December 22, 1999
Page 3 of 3

Suite 23, Magnolia Courtyard, 111 South Magnolia Drive, Tallahassee, Florida 32301, and at the Department's
Central Florida District Office, 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767.
Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**


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 CATEGORICAL
EXEMPTION DESIGNATION and all copies were sent by certified mail before the close of business on
12/28/99 to the person(s) listed:

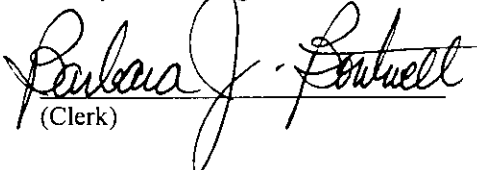
Mr. Walter P. Bussels, Managing Director, JEA

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this NOTICE
OF CATEGORICAL EXEMPTION DESIGNATION were sent by U.S. mail on the same date to the person(s)
listed, unless otherwise noted:

Mr. Jim Manning, AWQD
Mr. N. Bert Ginazza, JEA
Mr. Scott Sheplak, BAR (hand delivered)

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.


(Clerk) 12/28/99
(Date)

HLR/CHF/bm

Enclosures

Bruce Mitchell

21 West Church Street
Jacksonville, Florida 32202-1173

stamp rec'd: Dec. 9

December 8, 1999



Mr. Bruce Mitchell, P.E.
Engineer IV
Dept Environmental Protection
Air Resources Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Mitchell:

Jacksonville Electric Authority (JEA) requests concurrence in writing from the Florida Department of Environmental Protection (FDEP) concerning a permit exemption determination for a portable auxiliary boiler to be used approximately three weeks a year for the purpose of heating No. 6 fuel oil lines on Units 1 and 3 at the Northside Generating Station/St. Johns River Power Park.

This facility is located at 4377 Heckshire Drive, Jacksonville, Duval County. The Northside Generating Station/St. Johns River Power Park is currently operating under the Title V Air Operation Final Permit No. 0310045-002-AV.

Conditions requiring the use of a temporary boiler are contingent upon the capability of ambient temperatures to "freeze" the Units' fuel lines when Units 1 and 3 are offline simultaneously. This would typically occur only during the winter months. The portable boiler will not exceed a heat input of ten million BTUs per hour nor will it use more than fifty thousand gallons No.2 fuel oil per year. In addition, the No. 2 fuel oil burned will not exceed a 0.05 percent sulfur. Thus, the portable auxiliary boiler will not exceed any of the requirements for permit exemption under FAC 62-210.300(3)(a)(2).

Additionally, JEA does not believe the Title V permit needs to be opened/modified for this activity because of this exemption.

December 8, 1999
Mr. Mitchell
Page 2

JEA requests written FDEP concurrence of this determination. If any additional information is required, please do not hesitate to call me at 904/665-6247.

Sincerely,



N. Bert Gianazza, P.E.
Environmental Permitting
& Compliance Group

cc: Rich Robinson (RESD)
✓ Syed Arif (FDEP)

December 20, 1999

Mr. Bruce Mitchell, P.E.
Engineer IV
Dept. of Environmental Protection
Air Resources Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Mitchell:

JEA requests concurrence in writing from the Florida Department of Environmental Protection (FDEP) concerning a permit exemption determination for a paint booth used for maintenance activities at the Northside Generating Station/St. Johns River Power Park.

This facility is located at 4377 Hecksher Drive, Jacksonville, Duval County. The Northside Generating Station/St. Johns River Power Park is currently operating under the Title V Air Operation Final Permit No. 0310045-002-AV.

Coatings used at the paint booth amount to less than six gallons of paint a day, which includes solvents and thinners. In addition, the paint booth is not subject to volatile organic compound Reasonably Available Control Technology requirement of Chapter 62-296 (F.A.C.). Thus, the paint booth complies with the requirements for permit exemption under FAC 62-210.300(3)(a)(23).

Additionally, the Title V permit need not be opened/modified for this activity because it is insignificant according to Chapter 62-213.430(6)(b).

JEA requests written FDEP concurrence of this determination. If any additional information is required, please do not hesitate to call me at 904/665-6247. Thank you for your time.

Sincerely,

N. Bert Gianazza, P.E.
Environmental Permitting &
Compliance Group

cc: Rich Robinson (RESO)
Syed Arif (FDEP)

RECEIVED

DEC 22 1999

21 West Church Street

Jacksonville, Florida 32202-3139

BUREAU OF AIR REGULATION

December 20, 1999



Mr. Clair Fancy, P.E.
Chief, Bureau of Air Regulation
Dept Environmental Protection
Air Resources Management Division
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

Jacksonville Electric Authority (JEA) requests concurrence in writing from the Florida Department of Environmental Protection (FDEP) concerning a permit exemption determination for a paint booth used for maintenance activities at the Northside Generating Station/St. Johns River Power Park.

This facility is located at 4377 Hecksher Drive, Jacksonville, Duval County. The Northside Generating Station/St. Johns River Power Park is currently operating under the Title V Air Operation Final Permit No. 0310045-002-AV.

Coatings use at the paint booth is less than six gallons of paint a day, which includes solvents and thinners. In addition, the paint booth is not subject to volatile organic compound Reasonably Available Control Technology requirement of Chapter 62-296 (F.A.C.). Thus, the paint booth complies with the requirements for permit exemption under FAC 62-210.300(3)(a)(23).

Additionally, the Title V permit need not be opened/modified specifically for this activity because it is insignificant according to Chapter 62-213.430(6)(b).

Mr. Fancy
December 20, 1999
Page Two

JEA requests written FDEP concurrence of this determination. If any additional information is required, please do not hesitate to call me at 904/665-6247. Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read "N. Bert Gianazza". The signature is fluid and cursive, with a prominent initial "NB".

N. Bert Gianazza, P.E.

cc: Rich Robinson, P.E. (RESD)
Syed Arif, P.E. (FDEP)
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