

21 West Church Street
Jacksonville, Florida 32202-3139

June 30, 2009



Ms. Dana Brown
Environmental Enforcement Administrator
Environmental Quality Division
117 West Duval Street, Suite 225
Jacksonville, Florida 32202-4111

RECEIVED

JUN 30 2009

BUREAU OF AIR REGULATION

Dear Ms. Brown:

ELECTRIC

RE: Northside Generating Station Units 1 and 2
Consent Order with Compliance Plan AP-08-23 and AP-08-17

WATER

In accordance with the SDA Consent Order, item #8 on page two, which states, "JEA must submit a status report for the project to EQD" by June 30, 2009, below is an update on the status of each item required by the Consent Order:

SEWER

Project: CEMs for Mercury

Scope: "Install, perform a Hg RATA and operate Hg CEMS for CFBs #1 and 2".

Status: Completed.

The Unit 2 Hg CEMs RATA was completed in March of this year and the RATA test report submitted to EQD. A letter providing additional information requested by EQD was sent to Mr. Wayne Walker on June 19.

The Unit 1 Hg CEMs RATA was completed on June 26. The RATA test report will be submitted no later than 45 day after completion of testing. All indications are that the RATA was successfully passed and that the CEMs on both units are now operating properly. There are issues being resolved by the equipment vendor (Thermo) involving the weekly converter integrity check, and a data acquisition and handling system (DAHS) integration issue to be sorted out, but problems of this nature are to be expected since Hg CEMs technology is still evolving.

Engineering Study

Scope: "An engineering study will be completed to identify potential improvements in preventive and predictive maintenance, and potential equipment and system modifications (including opportunities for redundancy) which will result in minimizing the amount of time the SDA is off-line during CFB operation".

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Status: In progress.

A team of JEA employees has been working to identify possible further improvements to the SDA system. The various options will be evaluated, compiled into the appropriate format, and submitted as an engineering study to DEP and EQD in accordance with the recent permit revision Air Project No. 0310045-022-AC and the Consent Order.

Compliance Testing for Lead

Scope: In addition to required initial compliance testing, a compliance test for lead shall be conducted on approximately 80% pet coke and 20% coal with the SDA down for maintenance”.

Status: Scheduled.

The lead (Pb) testing while burning approximately 80% pet coke and 20% coal with the SDA off-line, is currently scheduled for July 27.

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.: Wayne Tutt, EQD
Syed Arif, FDEP ✓