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Jacksonville, Florida 32202-3139

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BUREAU OF AIR REGULATION



Mr. Jeffery F. Koerner, P.E.
Administrator, Bureau of Air Regulation
New Source Review Section
Division of Air Resource Management
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

E L E C T R I C

Subject: JEA Northside Generating Station
Unit 3 Air Permit Application Response to RAI
Project No. 0310045-026-AC

W A T E R

S E W E R

Dear Mr. Koerner:

In response to FDEP's Request for Additional Information (RAI) dated June 17, 2009 for the Northside Generating Station Unit 3 Repair and Maintenance Project, JEA is submitting the following information:

Question #1

Please provide an estimate of the cost to conduct the proposed work on Unit 3.

Response #1

Estimated capital project cost for Unit 3's repair and maintenance is \$22,660,000. The estimated operational and maintenance cost for Unit 3 is \$925,000. This cost does not include the Unit 3 generator rotor and assembly.

Question #2

Please provide an estimate of the cost for the proposed replacement of the Unit 3 electric generator rotor and assembly.

Response #2

Estimated cost for Unit 3's generator rotor and assembly is \$6,104,000.

Question #3

The application excludes emissions due to a 39.7% projected demand growth for Unit 3 during the five year period following the project. The estimated demand growth value is based on the delay in startup of JEA's Greenland Energy Center. The projected actual emissions reflect this increase in emissions. The projected demand growth and/or the excludable emissions need to be depicted in Table 2-3 of the

Mr. Koerner
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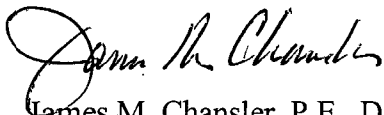
application, which is the difference between the baseline emissions and the projected actual emissions. Please revise Table 2-3 of the application to show the projected actual emissions resulting from demand growth.

Response #3

Table 2-3 has been revised to illustrate the emissions resulting from the projected demand growth for Unit 3 that the unit could accommodate without the Projects. As indicated in the application document, Unit 3's calculated capacity factor for the baseline period is approximately 24 percent. Thus, because of Unit 3's recent low annual capacity factor and the unit's high annual availability factor, the projected increase of this unit's operation based on demand growth can physically be accommodated. The revised table has been included below.

If you have any questions, please do not hesitate to contact Bert Gianazza of my staff at (904) 665-6247.

Sincerely,



James M. Chansler, P.E., D.P.A.
Chief Operating Officer
Responsible Official



cc: Trina L. Vielhauer – FDEP
Angela Morrison – HG&S
Kyle Lucas – B&V

Table 2-3 (Revised)
Unit 3 – Comparison of BAE, PAE, and EE tpy Levels

Pollutant ^(b)	BAE Emission Level (tpy)	PAE Emission Level (tpy) ^(a)	PAE to BAE Emission Difference (tpy) ^(c)	EE Emission Level (tpy) ^(d)	PAE to EE Emissions Increase (tpy)	PSD SER (tpy)	PSD Major Modification (Yes/No)
NO _x	1,916	2,676	760	2,676	0	40	No
SO ₂	6,791	9,488	2,697	9,488	0	40	No
PM ₁₀	232	325	93	325	0	15	No
PM	232	325	93	325	0	25	No
CO	243	340	97	340	0	40	No
VOC	29	40	11	40	0	100	No

Notes:

^(a) Unit 3's PAE are only based on a 39.7 percent demand growth rate. Project demand growth and capacity increases for this project were not considered as they were not applicable.

^(b) Emissions of lead, fluorides, H₂SO₄, H₂S, and PM_{2.5} were not included in this analyses. However, as illustrated in this analyses their respective PAE to EE emissions would also equal zero. Therefore, the emissions increase of these pollutants would also be less than the PSD SER. Calculations are contained in Appendix C.

^(c) The emissions difference between the PAE and the BAE reflects the emissions resulting from the 39.7 percent demand growth rate that the unit could accommodate without the Projects.

^(d) EE are considered adjusted BAE values due to the demand growth that the unit could accommodate without the Projects.

Acronyms:

BAE = Baseline Actual Emissions

PAE = Projected Actual Emissions

EE = Excludable Emissions

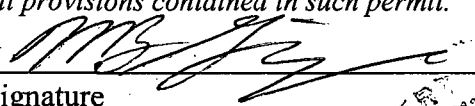
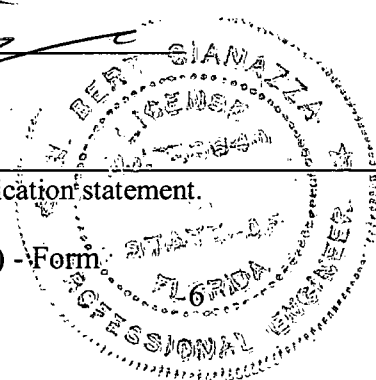
PSD = Prevention of Significant Deterioration

SEL = Significant Emission Level

Table 2-3 revised 6/24/09.

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: N. Bert Gianazza Registration Number: 38640
2. Professional Engineer Mailing Address... Organization/Firm: JEA Street Address: 21 W. Church Street City: Jacksonville State: FL Zip Code: 32202
3. Professional Engineer Telephone Numbers... Telephone: (904) 665 - 6247 ext. Fax: (904) 665 - 7376
4. Professional Engineer Email Address: giannb@jea.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(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</i> <i>(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.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , 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 plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , 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.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , 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.</i>  Signature  (seal) Date <u>7/20/09</u>

* Attach any exception to certification statement.