

**Sheplak, Scott***-file-*

**From:** Sheplak, Scott  
**Sent:** Monday, December 01, 2008 2:28 PM  
**To:** 'Norse, David M.'; 'Gianazza, N. Bert'  
**Cc:** Holtom, Jonathan  
**Subject:** RE: JEA-NGS/SJRPP/ST Title V permit renewal - Table 6 (revised)

following up on (2) ...

(2) The PM/PM10 listed values are in fact limits according to the permit processor. If the opacity standard is not met then testing can be done to demonstrate compliance with the mass emission rate. The PM/PM10 values are therefore kept as limits.

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**From:** Sheplak, Scott  
**Sent:** Monday, December 01, 2008 12:03 PM  
**To:** 'Norse, David M.'; 'Gianazza, N. Bert'  
**Cc:** Holtom, Jonathan  
**Subject:** RE: JEA-NGS/SJRPP/ST Title V permit renewal - Table 6 (revised)

I found the permit PSD-FL-010G! Some follow up points on these two items ...

(2) The revision project, PSD-FL-010G (effective 4/7/2006), had been processed as 0310045-015-AC. The Table 6 - Part B was in fact revised under this project. PSD-FL-010G clearly stated that the PM/PM10 limits were being removed from PSD-FL-010. PSD-FL-010G stated that these limits were for modeling purposes. The PSD-FL-010C with Table 6 - Part C lists the PM values, yet the proposed BACT determination lists either 5 or 10% opacity. The Table 6 - Part A & Part C do not appear to have been revised. The current applicable Table 6 - Part A & Part C are attached. I'll check with the two involved permit processors here on their interpretations on the PM values listed in Table 6 - Part C.

(1) I am still not able to clearly match the described emission units/points under the Table 6 - Part C "New Materials Handling Operations" to what is in the current Title V permit and our ARMS database. Maybe you can help with this?

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**From:** Sheplak, Scott  
**Sent:** Wednesday, November 26, 2008 3:59 PM  
**To:** 'Norse, David M.'  
**Cc:** 'Gianazza, N. Bert'  
**Subject:** RE: JEA-NGS/SJRPP/ST Title V permit renewal - Table 6 (revised)

I have incorporated the Table 6 Part A and Part B emission limits into the respective emission unit sections of the permit. I have been unable to locate the referenced PSD-FL-010G. If someone happens to have it, can you send it to me ASAP?

Also, with regard to Table 6 Part C:

(1) the emission unit descriptions do not match what is in the current Title V permit; and,  
 (2) I am unable to determine whether or not the listed PM/PM10 numbers are actually emission limits. The current permit contains VE limits either 5 or 10%. It seems that the PM values in Table 6 Part B are now listed as "predicted values" not limits. The original PSD-FL-010 seems to have the PM values listed as limits. PSD-FL-010C lists the PM values, yet the proposed BACT determination lists either 5 or 10% opacity.

Maybe someone with some historical knowledge can help me out with these items next week.

12/1/2008

Hoping you both have a Happy Thanksgiving!

Thanks, Scott

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**From:** Sheplak, Scott  
**Sent:** Monday, November 24, 2008 12:28 PM  
**To:** 'Norse, David M.'  
**Cc:** 'Gianazza, N. Bert'; Holtom, Jonathan  
**Subject:** JEA-NGS/SJRPP/ST Title V permit renewal - Table 6 (revised)

I have 3 follow up questions ...

1. The JEA comment number 42. pertains to a revised Table 6 which was attached to permit, PSD-FL-010G, (issued in 2006?). I do have the revised Table 6 you submitted. I am trying to verify its attachment to the cited PSD permit. I perused our electronic files and have been unable to locate the permit, PSD-FL-010G. If someone happens to have it, can you send it to me?
2. Table 6 has subdesignations within each emission unit like -022a, -022j, etc. ...

E.U. No.	Brief Description
<i>Regulated Emissions Units</i>	
-022	SJRPP: Bottom Ash, Fly Ash and Gypsum Handling and Storage Operations
-022a	Gypsum Dewatering Building
-022a	Gypsum Storage Enclosure
-022j	Gypsum Truck Loadout
-022j	Fly Ash Loadout for Silo 1A (metal structure)

Do the subdesignations within each emission unit have specific meaning at the facility (we were considering renumbering them)? It seems they do for emission testing.

Fyi, to simplify at least the Table of Contents I likely will remove the subdesignated emission units shortening it to look like this ...

E.U. No.	Brief Description
<i>Regulated Emissions Units</i>	
-022	SJRPP: Bottom Ash, Fly Ash and Gypsum Handling and Storage Operations

3. We were considering moving the Table 6 information into the respective emission unit sections of the permit. I reviewed the Table 6 contents and in addition to the specific VE limits for each emission point (~52 points) it contains a lot of details like emission descriptions (i.e., type of emission unit & air pollution control system(s) for each) and testing frequency.

In response to your specific comments, I am proposing to reference the testing frequencies specified in the table. The rationals provided for each emission point make sense, supporting the current testing frequencies.

Would your preference be to keep the table and simply reference it within the respective emission unit sections of the permit? After reviewing Table 6 in more detail my preference is to keep it that way.

When you get a chance please call and we can discuss 2. and 3.

Thanks, Scott

SJRPP PSD PERMIT  
PSD-FL-010(C)

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Table 6 - Part A

Emissions Unit	SO <sub>2</sub>	NO <sub>x</sub>	PM	Opacity (%)
Steam Generating Boiler No. 1 (6,144 MMBtu/hr maximum heat input)	4,669 lb/hr 0.76 lb/mmBtu (30-day rolling average)	3,686 lb/hr 0.6 lb/mmBtu	184 lb/hr 0.03 lb/mmBtu	20
Steam Generating Boiler No. 2 (6,144 MMBtu/hr maximum heat input)	4,669 lb/hr 0.76 lb/mmBtu (30-day rolling average)	3,686 lb/hr 0.6 lb/mmBtu	184 lb/hr 0.03 lb/mmBtu	20
Cooling Towers			67 lb/hr (each tower)	N/A

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PSD-FL-010(C)

Table 6 -- Part C

New Materials Handling Operations	PM/PM <sub>10</sub> (lb/hr)	Opacity (%)
Hopper Belt, Spillage Conveyors, and DC-1 Transfer Points - New Ship Unloader	0.13/0.06	10
Shiphold - New	0.54/0.26	10
Unloader Hopper and Spillage Collector Transfers - New Ship Unloader	0.28/0.13	10
Enclosed Pile - Vehicle Activities	0.04/0.01	5
Enclosed Storage Pile - 3 Transfer Points	0.13/0.06	5
Transfer Tower D-1	0.04/0.02	5
Transfer Tower D-2	0.04/0.02	5
New Blend Hopper	0.12/0.06	5
New Transfer Tower #1-NGS	0.09/0.04	5
New Transfer Tower #2-NGS	0.09/0.04	5
New Stacker	0.66/0.31	10
NGS Reclaimer	0.52/0.24	10
SJRPP Reclaimer	0.52/0.24	10
New Reclaim Transfer Tower	0.04/0.02	5
New Transfer Tower #3-NGS	0.08/0.04	5
New Transfer Tower #4-NGS	0.06/0.03	5

Note: PM<sub>10</sub> limits apply only to new and modified emission points. If only one standard is listed, the standard applies to PM emissions.