

21 West Church Street  
Jacksonville, Florida 32202-3139

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BUREAU OF AIR REGULATION

September 29, 2008



Mr. Scott Sheplak, P.E.  
Professional Engineer  
Bureau of Air Regulation  
Division of Air Resources Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

ELECTRIC

RE: Northside Generating Station/St Johns River Power Park  
Title V Permit (0310045-0016-AV)

WATER

Dear Mr. Sheplak:

SEWER

The purpose of this letter is to request FDEP to add some insignificant activities to the above referenced Title V permit and to revise the current description of material handling activities in the Title V Permit to include a description of rail car unloading of fly and bed ash from the fly and bottom ash silos (EU 37 and EU 38).

Please add the following item to the insignificant activities list:

“Miscellaneous loading and unloading activities, such as bringing in Kaolinite or other inert fuel additives by truck or rail, taking BSA material out by truck or rail, and taking dry ash from the silos out by truck or rail.”

Historically, these activities were performed using trucks, but the ability to use rail as well as trucks was added recently.

Also, please change the description in Section III Subsection I NGS Materials Processing Operations as follows:

**Current Description:**

“The material handling and storage operations will process ash, limestone, coal, coal coated with latex, and petroleum coke to support the operation of CFB Boilers Nos. 1 and 2. Each materials handling and storage operation at NGS will employ one or more control strategies to limit emissions of particulate matter to meet specific emission limitations and/or visible emissions limits. The control strategies include the use of best operating/design practices, total or partial enclosures, conditioned materials, wet suppression, water sprays, and dust collection systems. Except for the Belt Conveyor 1, all conveyors are enclosed.”

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**Requested Description:**

The material handling and storage operations will process ash, limestone, coal, coal coated with latex, and petroleum coke to support the operation of CFB Boilers Nos. 1 and 2. Each materials handling and storage operation at NGS will employ one or more control strategies to limit emissions of particulate matter to meet specific emission limitations and/or visible emissions limits. The control strategies include the use of best operating/design practices, total or partial enclosures, conditioned materials, wet suppression, water sprays, and dust collection systems. Except for the Belt Conveyor 1, all conveyors are enclosed. **The fly and bed ash silos (EU-37 and EU-38) have the capability to unload into either trucks or rail cars.**

**Justification:**

The fly ash and bed ash silos currently are permitted to unload into trucks. Currently, a telescopic chute along with add-on fugitive dust controls such as partial enclosure, water sprays and water conditioning of ash are used. The same control processes will be used while the ash is transferred into a rail car. Since all the potential emissions have already been accounted for in the original PSD Permit (PSD-265), and there is no increase in ash throughputs, no new emissions will result from unloading of ash into a rail car. These emissions would have occurred anyway while the ash is unloaded into a truck.

My P.E. seal is attached. If you have any questions with regard to this matter, please call me at 665-6247.

Sincerely,

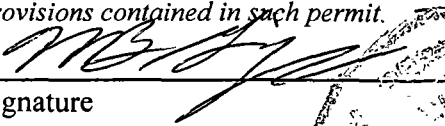
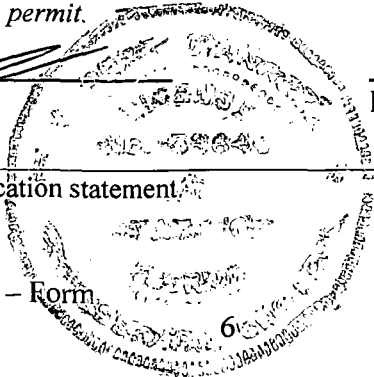
A handwritten signature in black ink, appearing to read 'N. Bert Gianazza', written in a cursive style.

N. Bert Gianazza, P.E.  
Environmental Services

Attachments: As noted.

# APPLICATION INFORMATION

## Professional Engineer Certification

1. Professional Engineer Name: N. Bert Gianazza Registration Number: 38640
2. Professional Engineer Mailing Address... Organization/Firm: JEA (Tower-8) Street Address: 21 West 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    _____ Date 9/29/08  (seal)

\* Attach any exception to certification statement.