



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

December 6, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

James M. Chansler
Vice President, Operations and Maintenance, JEA
21 West Church Street
Jacksonville, FL 32202

File No.	0310045-013-AC
FID No.	0310485
SIC No.	4911
Expires:	December 31, 2007

Re: DEP File No. 0310045-013-AC
Steam Turbine Rotor Upgrades
Northside Generating Station Units 1, 2 and 3

Dear Mr. Chansler:

The Department has reviewed your application for a construction permit to replace the existing LP steam turbine rotors on recently re-powered Units 1 and 2 with a more reliable and efficient model. Likewise, the Department has reviewed your application for a construction permit to replace the existing HP/IP steam turbine rotors on Unit 3, in lieu of making steam turbine rotor repairs.

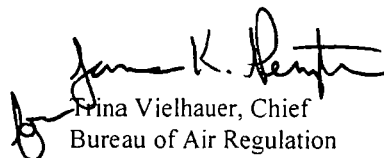
Because the re-powered units have not yet achieved normal, full-power operation (these were clean coal, CFB re-powerings), the Department finds that there will be no emission increases, and the project is therefore acceptable. Regarding Unit 3, operation is expected to decline as a result of the CFB units achieving normal, full power operation. In fact, this was the premise for JEA to accept lower, federally enforceable limits on Unit 3 in conjunction with the Units 1 and 2 re-powerings. Therefore, the Department finds that there should be no increase in emissions by replacing the Unit 3 HP/IP rotor. In summary, based upon your submittals, the Department finds the request to be acceptable.

You are hereby authorized to replace the LP steam turbine rotors on Units 1 and 2 as well as the HP/IP steam turbine rotors on Unit 3. No other changes are authorized or allowed by this action.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes. Any party to this order (permit modification) has the right to seek judicial review of it under Section 120.68, F.S., by the filing of 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 applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within (thirty) days after this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

Sincerely,


Trina Vielhauer, Chief
Bureau of Air Regulation

"More Protection, Less Process"

Printed on recycled paper.

Mr. James M. Chansler
December 6, 2004

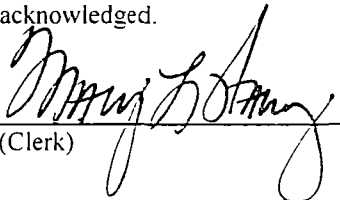
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this AIR CONSTRUCTION PERMIT was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 12/6/04 to the person(s) listed:

James M. Chansler, JEA *
N. Bert Gianazza, P.E., JEA
Gregg Worley, EPA
John Bunyak, NPS
Chris Kirts, NED
Richard Robinson, P.E. ERMD
Mr. Hamilton S. Oven, DEP-Siting

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk) 12/6/04
(Date)

Florida Department of
Environmental Protection

Memorandum

TO: Trina Vielhauer
THRU: J. K. Pennington
FROM: M. P. Halpin
DATE: October 11, 2004
SUBJECT: JEA -- Northside Generating Station
Upgrade of steam turbine rotors
DEP File No. 0310485-013-AC

JEA has submitted a permit application, requesting permission to replace the existing LP steam turbine rotors on recently re-powered Units 1 and 2 with a more reliable and efficient model. Likewise, they wish to replace the existing HP/IP steam turbine rotors on Unit 3, in lieu of making steam turbine rotor repairs. Because the re-powered units have not yet achieved normal, full-power operation (these were clean coal, CFB re-powerings) we are required to compare the requested emission PTE's to the permitted PTE's. Since there is no requested emission increase, the project is acceptable. Regarding Unit 3 (an older, existing unit) operation is expected to begin declining as a result of the CFB units achieving normal, full power operation. In fact, this was the premise for JEA to accept lower, federally enforceable limits on Unit 3 in conjunction with the Units 1 and 2 re-powerings (which JEA refers to as Community Commitment Levels). Therefore, it seems reasonable to allow the Unit 3 HP/IP rotor replacement to occur and the Department can lean on the application of the WEPCO ruling in the unlikely event that operation of that unit actually causes increased emissions.

Attached is the public notice package for the subject project. Although no permit revisions are required, I recommend that a public notice occur. I have discussed this project (several weeks ago) with Jim Little of EPA, and he indicated that EPA would take no issue with this conclusion.

I recommend your approval.

JKP/mph
Attachments

TRINA -

12-6-04

Hopefully, you remember this?

JEA public noticed it over a month ago and I just now realized that I need to get it out the door.

Thanks
- Mike