

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Bureau of Air Regulation
THROUGH: Jon Holtom, P.E., Title V Section *JH.*
FROM: Kris Lanh, Engineering Specialist II *KL*
DATE: April 15, 2011
SUBJECT: Draft/Proposed Permit No. 0340045-030-AV
Jacksonville Electric Authority (JEA)
Northside Generating Station/St. Johns River Power Park/
Separation Technology, LLC (NGS/SJRPP/ST)
Title V Air Operation Permit Revision

Attached for your review are the following items:

- Written Notice of Intent to Issue Air Permit;
- Public Notice of Intent to Issue Air Permit;
- Statement of Basis;
- Draft/Proposed permit; and,
- P.E. Certification.

This draft/proposed permit revision is for the Title V permit for Jacksonville Electric Authority, which is located in Duval County, Florida. The Statement of Basis provides a summary of the project and the rationale for issuance. The P.E. certification briefly summarizes the proposed project.

The application was received and deemed complete on February 17, 2011. Day 90 is May 19, 2011. There is no ongoing/open enforcement case for this facility, according to Duval County, City of Jacksonville, Environmental Quality Division.

I recommend your approval of the attached draft/proposed permit.

Attachments

P.E. CERTIFICATION STATEMENT

PERMITTEE

Jacksonville Electric Utility
21 West Church Street
Jacksonville, Florida 32202

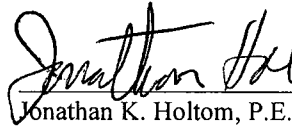
Permit No. 0310045-030-AV
Facility ID No. 0310045
Northside Generating Station and St. Johns
River Power Park (NGS/SJRPP)
Separations Technology, LLC (ST)
Title V Air Operation Permit Revision
Duval County, Florida

PROJECT DESCRIPTION

This project is for the revision of Title V air operation permit No. 0310045-020-AV for the above referenced facility. The purpose of the revision is to incorporate the provisions of Air Construction Permit No. 0310045-026-AC into the current Title V Operating Permit, in particular specific condition No. 3 which requires the annual reporting of PSD pollutants emissions for a period of 5 years. The AC permit authorized the repair, replacement, and maintenance of various equipment and components on the existing NGS Boiler No. 3 (EU003).

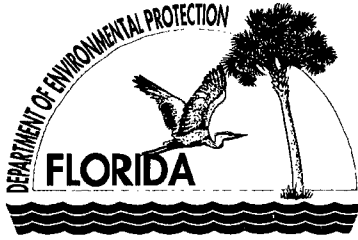
I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).

This review was conducted by Kris Lanh under my responsible supervision.


Jonathan K. Holtom, P.E.

Registration Number: 0052664


Date



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronic Mail – Received Receipt Requested

James M. Chansler, P.E., D.P.A., Chief Operations Officer
Jacksonville Electric Authority (JEA)
21 West Church Street
Jacksonville, Florida 32202

Re: Permit No. 0310045-030-AV
Northside Generating Station/St. Johns River Power Park/
Separation Technology, LLC
Title V Permit Revision

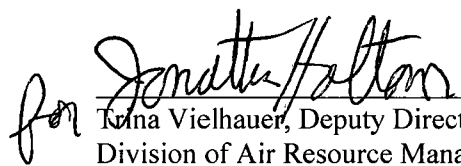
Dear Mr. Chansler:

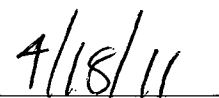
Enclosed is the draft/proposed permit package to revise the Title V air operation permit for Northside Generating Station/St. Johns River Power Park/Separation Technology, LLC. This facility is located in Duval County at 4377 Heckscher Drive, Jacksonville Florida. The permit package includes the following documents:

- The Statement of Basis, which summarizes the facility, the equipment, the primary rule applicability, and the changes since the last Title V revision.
- The draft/proposed Title V air operation permit revision, which includes the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permit provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the draft permit; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The Public Notice of Intent to Issue Title V Air Permit must be published as soon as possible and the proof of publication must be provided to the Department within seven days of the date of publication. Because this permit is being processed as a combined draft/proposed permit in order to reduce processing time, a duplicate copy of the proof of publication must also be transmitted by electronic mail within seven days of the date of publication to Ms. Ana Oquendo at EPA Region 4 at the following address: oquendo.ana@epamail.epa.gov.

If you have any questions, please contact the Project Engineer, Kris Lanh, by telephone at (850) 717-9094 or by email at kris.lanh@dep.state.fl.us

Sincerely,

for 
Tona Vielhauer, Deputy Director
Division of Air Resource Management


Date

Enclosures
TLV/jh/kl

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Title V Air Operation Permit by:*

Jacksonville Electric Authority
21 West Church Street
Jacksonville, Florida 32202

Permit No. 0310045-030-AV
Facility ID No. 0310045
Northside Generating Station/St. Johns River
Power Park/Separation Technology, LLC
Title V Air Operation Permit Revision
Duval County, Florida

Responsible Official:

James M. Chansler, P.E., D.P.A.
Chief Operations Officer

Facility Location: Jacksonville Electric Authority operates the Northside Generating Station/St. Johns River Power Park/Separation Technology, LLC (NGS/SJRPP/ST), which is located in Duval County at 4377 Heckscher Drive, Jacksonville, Florida.

Project: The purpose of this project is to revise Title V air operation permit No. 0310045-020-AV. Details of the project are provided in the application and the enclosed Statement of Basis.

Permitting Authority: Applications for Title V air operation permits for facilities that contain Acid Rain units are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 and 62-214 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft/proposed permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft/proposed permit by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue a Title V air operation permit revision to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft/proposed permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed permit, the Permitting Authority shall issue a revised draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

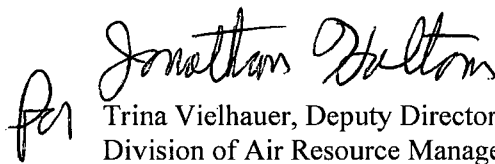
Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: ocuendo.ana@epamail.epa.gov. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

Executed in Tallahassee, Florida.


Trina Vielhauer, Deputy Director
Division of Air Resource Management

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

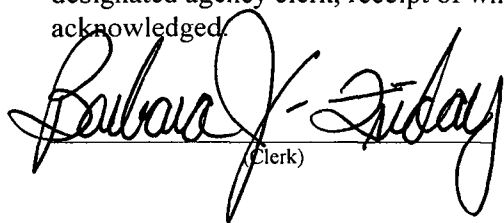
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit (including the Public Notice, the Statement of Basis, and the draft/proposed air operation permit), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on 4/19/11 to the persons listed below.

- Mr. James M. Chansler, P.E., D.P.A., Chief Operations Officer: chanjm@jea.com
- Mr. Michael J. Brost, Vice President, Electric System: brosm@jea.com
- Mr. N. Bert Gianazza, P.E., Environmental Services: GianNB@jea.com
- Mr. Kennard F. Kosky, P.E., Golder Associate: ken_kosky@golder.com
- Ms. Lori Tilley, Environmental Program Supervisor, City of Jacksonville: tilley@coj.net
- Ms. Katy Forney, U.S. EPA Region 4: forney.kathleen@epamail.epa.gov
- Ms. Ana Oquendo, EPA Region 4: oquendo.ana@epamail.epa.gov
- Ms. Barbara Friday, DEP BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)
- Ms. Victoria Gibson, DEP BAR: victoria.gibson@dep.state.fl.us (for reading file)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.


(Clerk) 4/19/11 (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft/Proposed Permit No. 0310045-030-AV
Jacksonville Electric Authority (JEA)
Northside Generating Station/St. Johns River Power Park/
Separation Technology LLC
Duval County, Florida

Applicant: The applicant for this project is Jacksonville Electric Authority. The applicant's responsible official and mailing address are: James M. Chansler, P.E., D.P.A., Chief Operations Officer, Jacksonville Electric Authority, Northside Generating Station/St. Johns River Power Park/Separation Technology, LLC (NGS/SJRPP/ST), 21 West Church Street, Jacksonville, Florida 32202.

Facility Location: The applicant operates the existing Northside Generating Station/St. Johns River Power Park/Separation Technology, LLC, which is located in Duval County at 4377 Heckscher Drive in Jacksonville, Florida.

Project: The applicant applied on February 17, 2011 to the Department for a Title V air operation permit revision. This is a revision of Title V air operation permit No. 0310045-020-AV. The existing facility consists of the Northside Generating Station (NGS) and St. Johns River Power Park (SJRPP) facilities and the Separations Technology, LLC (ST) fly ash processing system.

Permitting Authority: Applications for Title V air operation permits for facilities that contain Acid Rain units are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 and 62-214 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft/proposed permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft/proposed permit by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue a revised Title V air operation permit to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a subsequent final permit in accordance with the conditions of the draft/proposed permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft permit, the Permitting Authority shall issue a revised draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of the Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: quendo.ana@epamail.epa.gov. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

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Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

STATEMENT OF BASIS

JEA
Northside Generating Station and St. Johns River Power Park (NGS/SJRPP)
Separations Technology, LLC (ST) Facility

Title V Air Operation Permit Revision
Permit No. 0310045-030-AV

APPLICANT

The applicant for this project is JEA. The applicant's responsible official and mailing address are: Mr. James M. Chansler, P.E., D.P.A., Chief Operating Officer, JEA, NGS/SJRPP/ST, 21 West Church Street, Jacksonville, Florida 32202.

FACILITY DESCRIPTION

The applicant operates the NGS/SJRPP/ST facility, which is located in Duval County at 4377 Heckscher Drive, Jacksonville.

The existing facility consists of the Northside Generating Station (NGS) and St. Johns River Power Park (SJRPP) facilities and the Separations Technology, LLC (ST) fly ash processing system.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is for the revision of the existing Title V air operation permit for the above referenced facility to incorporate the provisions of air construction permit No. 0310045-026-AC into the current Title V Operating Permit, in particular specific condition No. 3 which requires the annual reporting of PSD pollutants emissions for a period of 5 years. The AC permit authorized the repair, replacement, and maintenance of various equipment and components on the existing NGS Boiler No. 3 (EU003).

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received in hard copy on February 17, 2011.
Draft/Proposed Title V air operation permit revision issued on [month, day] 2011.
Public Notice published [month, day] 2011.

PRIMARY REGULATORY REQUIREMENTS

Title III: This facility is a major source of hazardous air pollutants (HAP), based on the Title V air operation permit renewal application received July 3, 2008.

Title IV: This facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: This facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: This facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: This facility operates units subject to the Standards of Performance for New Stationary Sources (NSPS) of 40 Code of Federal Regulations (CFR) 60.

CAIR: This facility operates units subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

Siting: Several of the emissions units were originally certified pursuant to the power plant siting provisions of Chapter 62-17, F.A.C.

STATEMENT OF BASIS

CAM: Compliance Assurance Monitoring (CAM) applies to units at this facility. CAM applies to particulate matter emissions from the NGS Circulating Fluidized Bed Boiler Nos. 1 and 2 (Emission Unit ID Nos. -026 and -027) and SJRPP Boiler Nos. 1 and 2 (Emission Unit ID Nos. -016 and -017).

PROJECT REVIEW

The purpose of this Title V Air Operating Permit Revision is to incorporate the applicable specific conditions from previously issued air construction permit No. 0310045-026-AC. The AC permit authorized the permittee to conduct repairs, replacement and maintenance on various equipment and components related to Boiler No. 3 (EU003), including (but not limited to) the following:

- Electric generator rotor and assembly;
- Handcuff replacement on the primary superheater elements;
- Condenser structural assessment and repairs;
- Fiberglass circulating piping assessment and repairs;
- Feed water and heater drains piping flow corrosion inspection and repairs;
- Fuel oil piping condition assessment and repairs;
- Boiler soot-blowing system piping replacement;
- No. 4 feed water heater replacement;
- Furnace left and right water-wall replacement;
- Boiler waterside chemical cleaning;
- Replacement of Distributed Control System (DCS) and field devices;
- 480 Volt motor control center (MCC) refurbishment;
- Boiler duct work repair and replacement;
- Rebuild water rack;
- East air heater to wind-box expansion joint replacement;
- Induced draft fans A and B rotor replacements;
- Upgrade drum level transmitters;
- Closed cooling strainer cabinet replacement;
- Feed water heater and boiler feed water pump valve inspection and repair;
- Force draft fan motor replacement;
- Main steam line and cold reheat line elevation sag correction;
- Boiler feed pump turbine blade replacement; and
- Other changes as appropriate to ensure safe, reliable operations of the unit will be required.

Changes to the permit made as part of this revision are shown in ~~strike-through~~ format for deletions and in double underline format for additions. For ease of identification, all changes have also been highlighted in yellow within the permit document.

1. A cross reference to the new reporting requirement was added to Specific Condition A.32.
2. To reflect the reporting requirements imposed by permit No. 0310045-026-AC, Specific Condition A.39. is added.
 - A.39. Actual Emissions Reporting.** Based on analysis that compared baseline actual emissions with projected actual emissions and the project, and pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions:
 - a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.

STATEMENT OF BASIS

- b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
- (1) The name, address and telephone number of the owner or operator of the major stationary source;
 - (2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
 - (3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
 - (4) Any other information that the owner or operator wishes to include in the report.
- c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.
- d. For this project, the permittee estimated the following baseline actual emissions: 243 tons/year of carbon monoxide (CO); 1,916 tons/year of nitrogen oxides (NO_x); 6,791 tons/year of sulfur dioxide (SO₂); 232 tons/year of particulate matter (PM); 232 tons/year particulate matter of 10 microns or less (PM₁₀); and 29 tons/year of volatile organic compounds (VOC).
- e. The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. as provided by Appendix C of this permit. For this project, the permittee shall use the following methods in reporting the actual annual emissions for Unit 3:
- (1) The permittee shall use data collected from the continuous emissions monitoring systems (CEMS) to determine and report the actual annual emissions of SO₂ and NO_x.
 - (2) The permittee shall use the data collected from the required stack tests to determine and report the actual annual emissions of PM/PM₁₀. The permittee shall follow the stack test methods, test procedures and test frequencies specified in this permit.
 - (3) Unless otherwise approved by the Department, the permittee shall use the same emissions factors for reporting the actual annual emissions of CO and VOC as used in the application to establish baseline emissions.
 - (4) As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.

[Permit No. 0310045-026-AC, Specific Condition, 3.A.3.]

3. Specific Condition **A.39** was renamed to **A.40**.
4. Appendix C, Common Conditions was added to Section V of the permit.

CONCLUSION

This project revises Title V air operation permit No. 0310045-020-AV, which was effective January 1, 2009. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-212, 62-213 and 62-214, Florida Administrative Code, (F.A.C.).

Jacksonville Electric Authority
**Northside Generating Station(NGS)/
St. Johns River Power Park (SJRPP)/
Separations Technology, LLC (ST) Facility**

Facility ID No. 0310045
Duval County

Title V Air Operation Permit Revision

Permit No. 0310045-030-AV

(2nd Revision of Title V Air Operation Permit No. 0310045-020-AV)



Permitting Authority:

State of Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation, Title V Section
2600 Blair Stone Road, Mail Station #5505
Tallahassee, Florida 32399-2400

Telephone: (850) 717-9000, Fax: (850) 717-9097

Compliance Authority:

City of Jacksonville
Environmental and Compliance Department
Environmental Quality Division, Air Quality Branch

Jake Godbold City Hall Annex
407 North Laura Street, Third Floor
Jacksonville, Florida 32202

Telephone: (904) 255-7100, Fax: (904) 588-0518

Title V Air Operation Permit Revision
Permit No. 0310045-030-AV

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Referenced Attachments. At End
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(Draft/Proposed)

PERMITTEE:

JEA
21 West Church Street
Jacksonville, Florida 32202

Permit No. 0310045-030-AV
NGS/SJRPP/ST Facility
Facility ID No. 0310045
Draft Title V Air Operation Permit
Revision

The purpose of this permit is for the revision of the Title V air operation permit for the above referenced facility to incorporate the monitoring requirements from permit No. 0310045-028-AC. The existing NGS/SJRPP/ST facility is located at 4377 Heckscher Drive, Jacksonville, in Duval County. UTM Coordinates are: Zone 17, 446.90 km East and 3359.150 km North. Latitude is: 30° 21' 52" North; and, Longitude is: 81° 37' 25" West.

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code, (F.A.C.) Chapters 62-4, 62-210, 62-213 and 62-214. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawings, plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

0310045-020-AV Effective Date: January 1, 2009
0310045-028-AV Revision Effective Date: December 10, 2010
Renewal Application Due Date: May 20, 2013
Expiration Date: December 31, 2013

(Draft/Proposed)

Michael P. Halpin, P.E., Director
Division of Air Resource Management

MPH/TV/jkh/kl

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit -003

oil with the proportion of gas required to maintain SO₂ emissions between 90 to 100% of the SO₂ emissions limitation (1.62 to 1.98 lbs/MMBtu heat input, respectively). Following successful completion of such particulate matter and visible emissions testing, further particulate matter and visible emissions testing shall not be required during the remaining federal fiscal year unless fuel oil is fired containing a sulfur content greater than 0.20%, by weight, above the fuel oil sulfur content percent, by weight, that was fired during the most recent co-firing compliance tests. If fuel oil is co-fired containing a sulfur content greater than 0.20%, by weight, above the fuel oil sulfur content percent, by weight, that was fired during the most recent co-firing compliance tests for particulate matter and visible emissions, then additional particulate matter and visible emissions tests shall be performed as described above and as soon as practicable, but in no event more than 60 days from the day of first firing the higher sulfur percent fuel oil. Following successful completion of such particulate matter and visible emissions testing, further particulate matter and visible emissions testing shall not be required during the remaining federal fiscal year unless fuel oil is fired containing a sulfur content greater than 0.20%, by weight, above the fuel oil sulfur content percent, by weight, that was fired during the most recent co-firing compliance tests. If any additional particulate matter and visible emissions tests are imposed after completion of any required annual compliance tests, then the frequency testing base date shall be reset to 12-months after the date of completion of the last tests.

[Rules 62-4.070(3), 62-213.440, 62-296.405(1)(c)3. and 62-297.310(7)(a)9., F.A.C.; and, Part XI, Rule 2.1101, JEPB]

A.29. Annual VE Testing Not Required. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.; and, Part XI, Rule 2.1101, JEPB]

A.30. Annual And Renewal PM Testing. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; Part XI, Rule 2.1101, JEPB; and, ASP Number 97-B-01.]

A.31. Used Oil Sampling. Compliance with the “on-specification” used oil requirements will be determined from a sample collected from each batch delivered for firing. [Rules 62-4.070 and 62-213.440; and, 40 CFR 279]

Recordkeeping and Reporting Requirements

See Appendix RR, Facility-wide Reporting Requirements, for additional reporting requirements.

A.32. Reporting Schedule. The following report shall be submitted to the Compliance Authority:

Report	Reporting Deadline(s)	Related Condition(s)
Quarterly Excess Emissions	Every 3 months (quarter)	A.33. & A.34.
<u>Actual Emissions Reporting</u>	<u>Annually</u>	<u>A.39.</u>

[Rule 62-296.405(1)(g), F.A.C.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit -003

- A.33. Notification of Excess Emissions.** In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the ERMD-EQD in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the ERMD-EQD. [Rule 62-210.700(6), F.A.C.; and, Part III, Rule 2.301, JEPB]
- A.34. Excess Emissions Reports.** For each calendar quarter, submit to the ERMD-EQD a written report of emissions in excess of emission limiting standards, as set forth in Rule 62-296.405(1), F.A.C., and any continuous emissions monitoring system outages. The nature and cause of the excess emissions shall be explained. The report shall be submitted within 30 calendar days following the last day of the quarterly period. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years. [Rules 62-213.440 and 62-296.405(1)(g), F.A.C.; and, Part X, Rule 2.1001, JEPB]
- A.35. Used Oil Records.** Records shall be kept of each delivery of “on-specification” used oil with a statement of the origin of the used oil and the quantity delivered/stored for firing. In addition, monthly records shall be kept of the quantity of “on-specification” used oil fired in these emissions units. The above records shall be maintained in a form suitable for inspection, retained for a minimum of five years, and be made available upon request. [Rule 62-213.440(1)(b)2.b., F.A.C.; and, 40 CFR 279.61 and 761.20(e)]
- A.36. Used Oil Annual Report.** The permittee shall include in the “Annual Operating Report for Air Pollutant Emitting Facility” a summary of the “on-specification” used oil analyses for the calendar year and a statement of the total quantity of “on-specification” used oil fired in Boiler No. 3 during the calendar year. [Rule 62-213.440(1)(b)2.b., F.A.C.]
- A.37. Shut Down Records.** When the NGS boiler No. 3 is shut down, it shall be recorded in the boiler’s operating log book. [Rule 62-213.440, F.A.C.; and, AC16-85951]
- A.38. Fuel Consumption Records.** The owner or operator shall create and maintain for each emissions unit hourly records of the amount of each fuel fired, the ratio of fuel oil to gas if co-fired, and the heating value and sulfur content, percent by weight, of each fuel fired. These records must be of sufficient detail to be able to identify when additional particulate matter and visible emissions testing is required pursuant to specific condition **A.29.b.**, and, when applicable, demonstrate compliance with the requirements of Specific Condition **A.27.e.** [Rules 62-4.070(3), 62-213.410, 62-213.440 and 62-296.405(1)(c)3., F.A.C.]
- A.39. Actual Emissions Reporting.** Based on analysis that compared baseline actual emissions with projected actual emissions, and the project, and pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions:
- The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
 - The permittee shall report to the Department within 60 days after the end of each calendar year during the 5-year period setting out the unit’s annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
 - The name, address and telephone number of the owner or operator of the major stationary source;
 - The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit -003

- (3). If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
- (4). Any other information that the owner or operator wishes to include in the report.
- c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.
- d. For this project, the permittee estimated the following baseline actual emissions: 243 tons/year of carbon monoxide (CO); 1,916 tons/year of nitrogen oxides (NO_x); 6,791 tons/year of sulfur dioxide (SO₂); 232 tons/year of particulate matter (PM), 232 tons/year particulate matter of 10 microns or less (PM₁₀); and 29 tons/year of volatile organic compounds (VOC).
- e. The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. as provided by Appendix C of this permit. For this project, the permittee shall use the following methods in reporting the actual annual emissions for Unit 3:
- (1). The permittee shall use data collected from the CEMS to determine and report the actual annual emissions of SO₂ and NO_x.
 - (2). The permittee shall use the data collected from the required stack tests to determine and report the actual annual emissions of PM/PM₁₀. The permittee shall follow the stack test methods, test procedures and test frequencies specified in the current Title V air operation permit.
 - (3). Unless otherwise approved by the Department, the permittee shall use the same emissions factors for reporting the actual annual emissions of CO and VOC as used in the application to establish baseline emissions.
 - (4). As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.
- [Permit No. 0310045-026-AC, Specific Condition, 3.A.3.]

Miscellaneous

- A.40. Operation and Maintenance Plan. For Boiler No. 3, an Operation and Maintenance Plan required under RACT for PM is attached and a part of this permit pursuant to Rule 62-296.700(6), F.A.C. All activities shall be performed as scheduled and recorded data made available to the ERMD-EQD upon request. Records shall be maintained on file for a minimum of five (5) years. Appendix O&M, Operation and Maintenance Plan under RACT for PM, is attached as part of this permit. [Rule 62-296.700(6), F.A.C.; and, Part X, Rule 2.1001, JEPB]

SECTION V. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.

Appendix ASP, ASP Number 97-B-01 (With Scrivener's Order Dated July 2, 1997).

Appendix C, Common Conditions.

Appendix CAM, Compliance Assurance Monitoring Plan.

Appendix Hg CEMS - Quality Assurance Plan.

Appendix I, List of Insignificant Emissions Units and/or Activities.

Appendix 40 CFR 60, Subpart A - General Provisions.

Appendix 40 CFR 60, Subpart Da.

Appendix 40 CFR 60, Subpart Y.

Appendix 40 CFR 60, Subpart OOO.

Appendix NGS, CT Heat Input Nominal Values: Heat Load MW vs. Temperature.

Appendix O&M, Operation and Maintenance Plan under RACT for PM.

Appendix Q: Protocol for Startup and Shutdown.

Appendix RR, Facility-wide Reporting Requirements.

Appendix SJRPP, Table 6 (Revised): Parts A and B.

Appendix TR, Facility-wide Testing Requirements.

Appendix TV, Title V General Conditions.

Appendix U, List of Unregulated Emissions Units and/or Activities.

APPENDIX C
Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
4. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
5. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
6. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

RECORDS AND REPORTS

7. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
8. Emissions Computation and Reporting:
 - a. Applicability. This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]
 - b. Computation of Emissions. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
 - (1) Basic Approach. The owner or operator shall employ, on a pollutant-specific basis, the most accurate

APPENDIX C
Common Conditions

of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.

- (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
- (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.

(2) Continuous Emissions Monitoring System (CEMS).

- (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
 - 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
 - 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
- (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
 - 1) A calibrated flow meter that records data on a continuous basis, if available; or
 - 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.

(3) Mass Balance Calculations.

- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
 - 1) Demonstrates a means of validating the content of the pollutant that is contained in or

APPENDIX C
Common Conditions

- created by all materials or fuels used in or at the emissions unit; and
- 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
 - (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
 - (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- (4) Emission Factors.
- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
 - 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
 - b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.

APPENDIX C
Common Conditions

- (7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370(2), F.A.C.]

c. Annual Operating Report for Air Pollutant Emitting Facility

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
 - a. All Title V sources.
 - b. All synthetic non-Title V sources.
 - c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
 - d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.
- (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.
- (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
- (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

Friday, Barbara

To: chanjm@jea.com
Cc: brosmj@jea.com; Gianazza, N. Bert; 'KKosky@Golder.com'; tilley@coj.net; 'Kathleen Forney'; Ana Oquendo; Gibson, Victoria; Lanh, Kris; Holtom, Jonathan
Subject: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV
Attachments: 0310045-030-AV Signed Written Notice of Intent.pdf

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Attention: Kris Lahn

Owner/Company Name: JEA
Facility Name: NORTHSIDE/SJRPP
Project Number: 0310045-030-AV
Permit Status: DRAFT/PROPOSED
Permit Activity: PERMIT REVISION
Facility County: DUVAL

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0310045.030.AV.D_pdf.zip

“The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the “*Air Permit Documents Search*” website at

<http://www.dep.state.fl.us/air/emission/apds/default.asp> . “

Permit project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation.

Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)717-9095

Friday, Barbara

From: Chansler, James M. - Chief Operating Officer [ChanJM@jea.com]
To: Friday, Barbara
Sent: Tuesday, April 19, 2011 10:53 AM
Subject: Read: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Your message was read on Tuesday, April 19, 2011 10:52:47 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Brost, Mike J. - VP, Electric Systems [BrosMJ@jea.com]
To: Friday, Barbara
Sent: Tuesday, April 19, 2011 9:41 AM
Subject: Read: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Your message was read on Tuesday, April 19, 2011 9:40:54 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Gianazza, N. Bert [GianNB@jea.com]
Sent: Tuesday, April 19, 2011 9:39 AM
To: Friday, Barbara
Subject: Out of Office: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

I will be out of the office until Monday, April 25th. If you need assistance immediately, please call David Norse at (904) 665-5501.

Thank you, Bert

Florida has a very broad Public Records Law. Virtually all written communications to or from State and Local Officials and employees are public records available to the public and media upon request. JEA does not differentiate between personal and business e-mails. E-mail sent on the JEA system will be considered public and will only be withheld from disclosure if deemed confidential pursuant to State Law. Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public-records request, do not send electronic mail to this entity. Instead, contact JEA by phone or in writing.

Friday, Barbara

From: Gianazza, N. Bert [GianNB@jea.com]
To: Friday, Barbara
Sent: Wednesday, April 20, 2011 9:00 AM
Subject: Read: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Your message was read on Wednesday, April 20, 2011 9:00:22 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mx1.golder.com]
To: KKosky@Golder.com
Sent: Tuesday, April 19, 2011 9:40 AM
Subject: Relayed: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

KKosky@Golder.com

Subject: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Friday, Barbara

From: Kosky, Ken [Ken_Kosky@golder.com]
To: Friday, Barbara
Sent: Tuesday, April 19, 2011 9:48 AM
Subject: Read: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Your message was read on Tuesday, April 19, 2011 9:47:46 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: tilley@coj.net
Sent: Tuesday, April 19, 2011 9:39 AM
Subject: Relayed: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

tilley@coj.net

Subject: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Tilley, Lori [TILLEY@coj.net]
To: Friday, Barbara
Sent: Tuesday, April 19, 2011 1:44 PM
Subject: Read: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Your message was read on Tuesday, April 19, 2011 1:44:04 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive01.rtp.epa.gov]
To: forney.kathleen@epa.gov
Sent: Tuesday, April 19, 2011 9:40 AM
Subject: Relayed: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Delivay to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

forney.kathleen@epa.gov

Subject: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]
To: Oquendo.Ana@epamail.epa.gov
Sent: Tuesday, April 19, 2011 9:40 AM
Subject: Relayed: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

Oquendo.Ana@epamail.epa.gov

Subject: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Friday, Barbara

From: Microsoft Exchange
To: Holtom, Jonathan; Lanh, Kris; Gibson, Victoria
Sent: Tuesday, April 19, 2011 9:39 AM
Subject: Delivered: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Your message has been delivered to the following recipients:

Holtom, Jonathan

Lanh, Kris

Gibson, Victoria

Subject: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Holtom, Jonathan
To: Friday, Barbara
Sent: Tuesday, April 19, 2011 1:33 PM
Subject: Read: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Your message was read on Tuesday, April 19, 2011 1:33:28 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Lanh, Kris
To: Friday, Barbara
Sent: Tuesday, April 19, 2011 9:56 AM
Subject: Read: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Your message was read on Tuesday, April 19, 2011 9:55:45 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Tuesday, April 19, 2011 1:59 PM
Subject: Read: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Your message was read on Tuesday, April 19, 2011 1:58:46 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Holbrooks, Kevin E. - Director, Compliance [HolbKE@jea.com]
Sent: Tuesday, April 19, 2011 2:09 PM
To: Friday, Barbara
Cc: Chansler, James M. - Chief Operating Officer; Mann, Athena T. - Vice President, Environmental Services; Gianazza, N. Bert
Subject: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Barbara,

My RO and I have received this e-mail and can access the documents.

Thank you

Kevin

From: Friday, Barbara [<mailto:Barbara.Friday@dep.state.fl.us>]
Sent: Tuesday, April 19, 2011 9:39 AM
To: Chansler, James M. - Chief Operating Officer
Cc: Brost, Mike J. - VP, Electric Systems; Gianazza, N. Bert; KKosky@Golder.com; tilley@coj.net; Kathleen Forney; Ana Oquendo; Gibson, Victoria; Lanh, Kris; Holtom, Jonathan
Subject: JACKSONVILLE ELECTRIC AUTHORITY - NORTHSIDE GENERATING STATION (NGS)/ST. JOHNS RIVER POWER PARK (SJRPP)/SEPARATIONS TECHNOLOGY, LLC (ST) FACILITY; 0310045-030-AV

Dear Sir/ Madam:

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Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Attention: Kris Lahn

Owner/Company Name: JEA
Facility Name: NORTHSIDE/SJRPP
Project Number: 0310045-030-AV
Permit Status: DRAFT/PROPOSED
Permit Activity: PERMIT REVISION
Facility County: DUVAL

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0310045.030.AV.D_pdf.zip

“The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the “*Air Permit Documents Search*” website at <http://www.dep.state.fl.us/air/emission/apds/default.asp> . “

Permit project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation.

Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)717-9095

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

Florida has a very broad Public Records Law. Virtually all written communications to or from State and Local Officials and employees are public records available to the public and media upon request. JEA does not differentiate between personal and business e-mails. E-mail sent on the JEA system will be considered public and will only be withheld from disclosure if deemed confidential pursuant to State Law. Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public-records request, do not send electronic mail to this entity. Instead, contact JEA by phone or in writing.