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Jacksonville, Florida 32202-3139

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DIVISION OF AIR  
RESOURCE MANAGEMENT

February 29, 2012



Mr. Jeffery Koerner, P.E.  
Division of Air Resource Management  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399

RE: JEA Northside Generating Station (NGS) Units 1 and 2  
Title V Permit No. 0310045-030-AV and Project No. 0310045-022-AC  
Mercury Continuous Emissions Monitoring Systems (CEMS)

E L E C T R I C

Dear Mr. Koerner:

W A T E R

S E W E R

Pursuant to conversation with Jon Holtom, JEA has operated the subject mercury CEMS for approximately three years (initial RATAs were conducted on March 27, 2009 on Unit 2, and June 26, 2009 on Unit 1). JEA agreed to operate these monitors via project no. 0310045-022-AC.

Specific Condition 50.(b) of the above referenced construction permit and Specific Condition G.24 of the above referenced Title V permit state, in part, that the requirement to operate and maintain these mercury CEMS "will stay in effect until such time that the state or EPA passes a regulatory requirement for mercury detailing the Hg CEMS operational protocol, at which time that rule will become the preferred protocol".

Since the recently proposed utility mercury and air toxics standards (MATS) rule has such a mercury monitoring protocol and will become effective on April 16, 2012, we request the Department's concurrence that this Hg monitoring requirement has been fulfilled and can cease as of April 16, 2012. JEA will implement the new protocol in accordance with the MATS rule. It is noted that due to the extremely low mercury emission rates on these units, the data have consistently been below the calibration error threshold of 1 ug/m<sup>3</sup>.

If there are any questions concerning this request, please do not hesitate to contact me at (904) 591-2595. The Department's expeditious review of this request is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jay A. Worley', is written over a large, stylized circular flourish.

Jay A. Worley, Director  
Environmental Programs

cc: Alvaro Linero, P.E., FDEP