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JACKSONVILLE ELECTRIC AUTHORITY

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April 20, 1998



Mr. Bruce Mitchell
Florida Dept. of Environmental Regulation
2600 Blair Stone Rd.
Tallahassee, FL.

RECEIVED

APR 23 1998

BUREAU OF
AIR REGULATION

RE: Jacksonville Electric Authority (JEA)
Northside Generating Station (NGS) / St. Johns River Power Park (SJRPP)
Title V Permit No. 0310045-001-AV

Dear Mr. Mitchell:

Pursuant to our telephone conversations concerning the above referenced permit, the following comments indicate discrepancies that have been identified in the final permit that are not consistent with existing SJRPP PSD permit (PSD-FL-010), SJRPP's Conditions of Certification (PA 81-13), or applicable regulations. In addition, several clarifying amendments are requested at the end of this letter.

REQUESTED REVISIONS: DISCREPANCIES

Section II. Facility-Wide Conditions

Condition 2. This Condition should be revised as follows: "No person shall ~~not~~ cause, suffer, allow, or permit"

Section III. Emissions Units and Conditions

D.3.c. This Condition states that the maximum weight of petroleum coke burned shall not exceed 100,000 pounds per hour. The language "averaged over 24 hours" should be changed to "30 day rolling average" to correspond to the basis of the emission limits and the fact that the pounds per hour limits are correspondent to such.

D.3.d. The third sentence in this provision prohibiting the use of used oil except when firing at "normal operating temperatures" is ambiguous and should be deleted. If this was intended to mean used oil could not be fired during startup and shutdown, this prohibition is included in the second sentence of this provision.

D.7.a. The maximum ash content of the coal is 18%, by weight and not 0.18% by weight.

D.10.a. The formula should read: $SO_2 \text{ (lb/MMBtu)} = (0.2 \times C/100) + 0.4$

D.10.c. The formula should read: $SO_2 \text{ (lb/MMBtu)} = [0.1653 \times C \times S - 0.4 \times C + 4] \times 1/100$

D.11.(1) The phrase "and 90 percent reduction" should be included.

D.13.b. Limiting the petroleum coke sulfur content to no more than 4.0 percent, by weight, dry basis is not correct. This should read "The blend of petroleum coke and coal sulfur content shall not exceed 4.0 percent, by weight." The 4% limit applies to the fuel blend, not the petcoke individually. Also, there is no reference to "dry basis" in the existing permits and therefore it should be deleted here.

D.14.(2) This provision should be revised as follows: "If emissions of SO_2 to the atmosphere are equal to or less than"

D.18. This Condition should be deleted because there is no comparable condition in PSD-FL-010. PSD-FL-010 simply states that CO emissions will be minimized utilizing combustion controls.

- D.19. This Condition should be deleted in its entirety because these provisions apply to 40 CFR Subpart D units, and the SJRPP units are subject to 40 CFR Subpart Da. Further, subparagraph (1) of Condition D.19 is redundant to Condition D.8.
- D.20. These Conditions should be deleted because these emissions units are NSPS units subject to the excess emissions provisions of 40 CFR Part 60, which are applicable as a matter of Florida law because 40 CFR Part 60 is incorporated by reference in Rule 62-204.800, Fla. Admin. Code.
- D.21. Further, the applicable excess emissions provisions of 40 CFR Part 60 are already contained in this Title V permit under Condition D.25 and the Appendix containing selected provisions from 40 CFR 60 Subpart A.
- D.XX. A Condition should be added allowing data from RATA tests to be utilized for performance test purposes. This request is similar to a request by Kissimmee Utility Authority which has already been approved by DEP without the need for an Alternate Sampling Procedure (ASP).
- D.52(a)4. Subparagraph b. should be revised because there is no annual stack test requirement for units that utilize CEMs to determine compliance with specific pollutants (SO₂ and NO_x), and subparagraph c. should be deleted because this unit is not subject to a NESHAP. See comment on Condition D.53 below.
- D.52(a)5. The sentence is incomplete and should read "does not burn liquid and/or solid fuel".
- D.53. The Conditions of Certification were modified to remove stack tests for sulfur dioxide and nitrogen oxides in lieu of CEMS data which was based on the December 15, 1995 guidance document by Howard Rhodes - "Guidance Regarding Annual Compliance Testing Exemption for Facilities Utilizing CEMs." Therefore, these two parameters should be removed from this item. Note that the PSD permit does not specifically require a stack test.
- D.67. This Condition should be revised as follows to reflect the fact that this unit does not burn gas, and that hourly records are only kept regarding the amounts of each fuel fired; other records should only be required on a per shipment basis: "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~~ Records regarding the heating value, and sulfur and ash content, percent by weight, of each fuel fired will either be provided by the vendor or prepared by the permittee, and maintained by the permittee for each shipment of fuel received."
- D.68. There are no requirements to submit this data per SJRPP permit requirements and therefore should not be required. Records are maintained on site for agency review as needed.

Subsection E. Auxiliary Boilers

SJRPP Auxiliary Boilers have been removed from SJRPP and deleted from the Conditions of Certification. Therefore this section is not warranted and any reference to the auxiliary boilers throughout the permit should be deleted.

Subsection F. Coal Storage Yard and Transfer Systems

- F.8. Because this unit is subject to the NSPS under 40 CFR Part 60, Subpart Y, the excess emissions provisions contained in 40 CFR Part 60 are applicable for any NSPS emission limits for this unit. Accordingly, Conditions F.8 and F.9 should contain the following introductory language: "For emission limits not derived from NSPS, excess emissions . . ." See comment on Conditions D.20 and D.21 above.

CLARIFYING AMENDMENTS

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Section III. D. It is understood that the Megawatts are in the permit for informational purposes only.

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There are numerous references in the Title V permit to the "attached" Tables in PSD-FL-010. These Tables should therefore be attached as part of the Title V permit, and so indicated on this page.

Section I. Facility Information

Subsection A. Facility Description: Petroleum coke should be referenced.

Section III. Subsection A.

Description. The commence operation date for unit 2 should be changed from "1972" to "November 16, 1966."

A permitting note should be included with the heat input numbers indicating that the heat input is included only for purposes of determining the capacity at which testing occurred, and that a heat input determination need only be made while testing.

- A.5. This Condition reflects an Order issued by the Department allowing annual compliance testing and a 40% opacity limit. This Order should be attached to this Title V permit and the language revised as follows: "For Boilers Nos. 1 and 3, visible emissions shall not exceed 40 percent opacity. DEP has determined that these units Emissions units governed by this visible emissions limit shall compliance test for particulate matter emissions annually" A copy of the Order is attached for your convenience.
- A.8. This Condition should be revised to reflect the specified compliance test method as follows: "Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured in accordance with Condition A.22. ~~by applicable compliance methods.~~
- A.10. This Condition should be revised to reflect the specified compliance test method as follows: "SO₂ emissions shall not exceed 1.98 pounds per million Btu heat input, as measured in accordance with Conditions A.17, A.23 and A.24. ~~by applicable compliance methods.~~
- A.12. This Condition should be revised to reflect the specified compliance test method as follows: "For Boiler No. 3, nitrogen oxides emissions shall not exceed 0.30 lb/mmBtu heat input, as measured in accordance with Condition A.18. ~~by applicable compliance methods.~~
- A.13. This Condition states that JEA can only burn used oil that is generated by JEA, yet the compliance provisions in this Condition and throughout Subsection A. (e.g., A.34, A.38) refers to "delivery" of the used oil, and analysis by the vendor. These conditions should be clarified to reflect the fact that used oil is not "delivered."
- A.18. The citation to this Condition should be changed from "Rule 62-296.450(1)(e)4." to "Rule 62-296.405(1)(e)4."
- A.31. This Condition should be revised as follows: "(a)4.a. visible emissions if there is an applicable standard; b. particulate matter; c. sulfur dioxide; d. nitrogen oxide ~~Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated pollutant; and e. Each NESHAP pollutant, if there is an applicable standard.~~

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Subsection B.

A permitting note should be included with the heat input numbers indicating that the heat input is included only for purposes of determining the capacity at which testing occurred, and that a heat input determination need only be made while testing.

- B.1. In accordance with the Title V application and existing operating permit, the heat input when firing natural or LP gas should be 123.5, not 120.0. Also, the authority for this provision should state that the application was filed on June 14, 1996, rather than 1997.

Subsection C.

Description. As indicated in the Title V application, CT No. 5 began commercial service in February of 1974, not December 1974.

- C.3. This Condition should be revised as follows: "Only (~~virgin~~) new No. 2"

Subsection D.

The description should be revised to reflect the correct dates of initial operation as indicated in the application: boiler No. 1 (December 15, 1986), and boiler No. 2 (March 24, 1988).

A permitting note should be included with the heat input numbers indicating that the heat input is included only for purposes of determining the capacity at which testing occurred, and that a heat input determination need only be made while testing.

- D.15.(1) The reference to "bituminous coal" should be changed to "coal or coal/coke blend."
- D.15.(2) The reference to "All other fuels - oil" is ambiguous and should be changed to "liquid fuels."
- D.30. Last sentence "is experienced" is stated twice.
- D.37. The word "acceptable" in the last sentence should be capitalized.
- D.70, D.71, D.72. The authority for these Conditions should reference the Conditions of Certification.
- D.75. The authority for this Condition should cite to 40 CFR 60.48a(e)(1) and reference Condition D.44.

Subsection G. Limestone and Flyash Handling

The word "generally" should be removed from the last sentence in the system description.

- G.6.c. This provision should be made consistent with the permit language as well as G.7a. which is "Limestone Silo," not "limestone day silo."

Subsection H. Cooling Towers

What BACT does this description refer to?

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Subsection IV. Acid Rain

The description denotes MW. It is understood that this is for informational purposes only.

A.5. All references to the "Jacksonville Electric Company" should be changed to "Jacksonville Electric Authority."

Tables 1-1, and 2-2

These Tables should be revised in accordance with the comments above.

If you have any questions regarding these comments, please contact Bert Gianazza at (904)665-6247 for issues relating to the Northside facility, and Jay Worley at (904)751-7729 for issues relating to the Power Park.

Sincerely,



M. Claudia Maire
Vice President
Environmental Health & Safety

cc: Scott Sheplak
Jeff Brown, Esq. } 4/24/98
Bruce Mitchell } REM