

*Bruce Mitchell*

31 West Church Street

Jacksonville, Florida 32202-1139

stamp rec'd: Dec. 9

December 8, 1999



Mr. Bruce Mitchell, P.E.  
Engineer IV  
Dept Environmental Protection  
Air Resources Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Mitchell:

Jacksonville Electric Authority (JEA) requests concurrence in writing from the Florida Department of Environmental Protection (FDEP) concerning a permit exemption determination for a portable auxiliary boiler to be used approximately three weeks a year for the purpose of heating No. 6 fuel oil lines on Units 1 and 3 at the Northside Generating Station/St. Johns River Power Park.

This facility is located at 4377 Heckshire Drive, Jacksonville, Duval County. The Northside Generating Station/St. Johns River Power Park is currently operating under the Title V Air Operation Final Permit No. 0310045-002-AV.

Conditions requiring the use of a temporary boiler are contingent upon the capability of ambient temperatures to "freeze" the Units' fuel lines when Units 1 and 3 are offline simultaneously. This would typically occur only during the winter months. The portable boiler will not exceed a heat input of ten million BTUs per hour nor will it use more than fifty thousand gallons No.2 fuel oil per year. In addition, the No. 2 fuel oil burned will not exceed a 0.05 percent sulfur. Thus, the portable auxiliary boiler will not exceed any of the requirements for permit exemption under FAC 62-210.300(3)(a)(2).

Additionally, JEA does not believe the Title V permit needs to be opened/modified for this activity because of this exemption.

December 8, 1999  
Mr. Mitchell  
Page 2

JEA requests written FDEP concurrence of this determination. If any additional information is required, please do not hesitate to call me at 904/665-6247.

Sincerely,



N. Bert Gianazza, P.E.  
Environmental Permitting  
& Compliance Group

cc: Rich Robinson (RESD)  
✓ Syed Arif (FDEP)