21 West Church Street
Jacksonville, Florida 32202-3139

JEA

October 10, 2000

Mr. Bruce Mitchell, P.E.
Environmental Administrator
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: St. Johns River Power Park (Title V Permit No. 0310045-002-AV)
Request for Title V Permit Revision

Dear Mr. Mitchell:

Please acknowledge by letter or permit revision a categorical exemption under FAC 62-210.300(3)(a) for the below emergency generator to be installed at SJRPP:

Mfr., make, and model: Onan 75 GGHF generator with Ford Model WSG-1068 naturally aspirated 415 c.i. (6.8 L) V10 engine.
Manufacturer recommended run time: 0.5 hr/week
Method of compliance with exemption: Records of fuel usage.

Exhaust emissions data, and the required P.E. certification and R.O. signature are enclosed.

If you have any questions with regard to this matter, please contact me at (904) 665-6247.

Sincerely,

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

Enclosures: As noted.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
   Walter P. Bussells, Managing Director and CEO
2. Owner/Authorized Representative or Responsible Official Mailing Address:
   Organization/Firm: JEA
   Street Address: 21 West Church Street
   City: Jacksonville State: FL Zip Code: 32202
3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
   Telephone: (904) 665 - 7220 Fax: (904) 665 - 7366
4. Owner/Authorized Representative or Responsible Official Statement:

   I, the undersigned, am the owner or authorized representative(check here [ ], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

   Signature 10/4/00 Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: N. Bert Gianazza
   Registration Number: 38640
2. Professional Engineer Mailing Address:
   Organization/Firm: JEA
   Street Address: 21 West Church Street
   City: Jacksonville State: FL Zip Code: 32202
3. Professional Engineer Telephone Numbers:
   Telephone: (904) 665 - 6247 Fax: (904) 665 - 7376

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [ ], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ ], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

NILS BERT GIANAZZA CERTIFICATE No. 38640 STATE OF FLORIDA PROFESSIONAL ENGINEER

Signature

10/4/00
Date

(seal)

* Attach any exception to certification statement.

665-7371

75GGHF
ONAN GENERATOR SET
EXHAUST EMISSION DATA SHEET

ENGINE

Model: Ford WSG-1068
Type: 4 Cycle, 90°V 10 Cylinder Spark-Ignited
Aspiration: Natural
Compression Ratio: 9:1
Emission Control Device: None

Bore: 3.55 in. (90 mm)
Stroke 4.17 in. (106 mm)
Displacement: 415 cu. in. (6.8 liters)

PERFORMANCE DATA	NATURAL GAS	PROPANE
Getset Rating @ 1800 RPM (60 Hz)	70	75
HP @ 1800 RPM (60 Hz)	112	119
Fuel Consumption (scfh)	889	363
Air to Fuel Ratio	17.3	15.8
Exhaust Gas Flow (CFM)	550	550
Exhaust Gas Temperature (°F)	1100	1100

EXHAUST EMISSION DATA

(All Values are Grams per KW-Hour)

COMPONENT	NATURAL GAS	PROPANE
HC (Total Unburned Hydrocarbons)	1.2	1.0
NOx (Oxides of Nitrogen as NO2)	12.9	14.2
CO (Carbon Monoxide)	10.1	4.4
PM10 (Particulate Matter)	negligible	negligible

TEST CONDITIONS

Data was recorded during steady-state rated engine speed (± 25 RPM) with rated load (± 2%).
Pressures, temperatures, and emission rates were stablized.

Fuel Specification:

Natural Gas: Natural Gas as received from Supplier.

Propane: Meets the requirements for Commercial Grade Propane under the ASTM D1835 Standard Specification for Liquefied Petroleum Gases.

Intake Air Temperature: 77 ± 9 ° F
Barometric Pressure: 29.6 ± 1 In. Hg
Humidity: NOx measurement corrected to 75 grains H2O/lb dry air

The NOx, HC, and CO emission data tabulated here were taken from a single engine under the test conditions shown above. The data are subject to instrumentation, and engine to engine variability. Engine operation with excessive air intake or exhaust restriction beyond published maximum limits, or with improper maintenance, may result in elevated emission levels.