

ENVIRONMENTAL RESOURCE MANAGEMENT DEPARTMENT

Environmental Quality Division



April 11, 2006

Ms. Trina L. Vielhauer
Chief, Bureau of Air Regulation
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

**RE: Draft Air Construction Permit Project Nos: 0310045-15-AC/ PSD-FL-010G/
PSD-FL-265C
Draft Title V Air Operating Permit Revision Project No.: 0310045-016-AV
JEA – Northside Generating Station/St. Johns River Power Park/
Separation Technologies, Inc.**

Dear Ms. Vielhauer:

The City of Jacksonville, Environmental Quality Division (EQD) has reviewed the referenced permit revisions with the Jacksonville Environmental Protection Board (JEPB) and JEA. At the JEPB meeting on April 10, 2006, the JEPB and JEA agreed to the following change in the revised specific condition 26. (0310045-003-AC/PSD-FL-265) and revised specific condition H.21. (0310045-011-AV):

FROM:

26. and H.21. Authorized Emissions. Notwithstanding other emission limits and standards established by this permit, excess emissions resulting from startup, shutdown, or malfunction shall be permitted provided (1) that best operational practices are adhered to and (2) the duration of excess emissions shall be minimized but not exceed sixty (60) hours in any calendar month per emissions unit (CFBs Units Nos. 1 and 2). The permittee shall keep operational records necessary to demonstrate compliance with this restriction. Emissions data collected during periods of startup, shutdown, and malfunction shall be included when determining compliance with annual emission limits. The CFB Units shall not be started up at the same time. The permittee shall update the written procedure summarizing the current best operational practices to be followed every 5 years (at operating permit renewal).

Pursuant to Rule 62-210.200, F.A.C., Definitions, the following are defined:

a. Startup: The commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.

b. Shutdown: The cessation of the operation of an emissions unit for any purpose.



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c. Malfunction: Any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner.

{Permitting Note: See Specific Conditions H.49. and H.51. for reporting of excess emissions.}

[Rules 62-210.200, 62-210.700(1) & (5), F.A.C.; and, 0310045-015-AC/PSD-FL-265C]

TO:

26. and H.21. Authorized Emissions. Notwithstanding other emission limits and standards established by this permit, excess emissions resulting from startup, shutdown, or malfunction shall be permitted provided (1) that best operational practices are adhered to and (2) the duration of excess emissions shall be minimized but not exceed sixty (60) hours on a 30 day rolling average in any calendar month per emissions unit (CFBs Units Nos. 1 and 2). The permittee shall keep operational records necessary to demonstrate compliance with this restriction. Emissions data collected during periods of startup, shutdown, and malfunction shall be included when determining compliance with annual emission limits. The CFB Units shall not be started up at the same time. The permittee shall update the written procedure summarizing the current best operational practices to be followed every 5 years (at operating permit renewal).

Pursuant to Rule 62-210.200, F.A.C., Definitions, the following are defined:

- a. Startup: The commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.
- b. Shutdown: The cessation of the operation of an emissions unit for any purpose.
- c. Malfunction: Any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner.

{Permitting Note: See Specific Conditions H.49. and H.51. for reporting of excess emissions.}

[Rules 62-210.200, 62-210.700(1) & (5), F.A.C.; and, 0310045-015-AC/PSD-FL-265C]

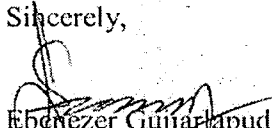
EQD believes the requested change will prevent the potential for CFB Units No. 1 and 2 from operating in an excess emissions mode for 5 straight days per unit (2.5 days at the end of a month and 2.5 days at the beginning of the next month). EQD has concerns over violations of the National Ambient Air Quality Standards, under such prolonged conditions.

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As always, DEP's consideration and assistance in protecting the air quality of Jacksonville is appreciated.

If you have any questions concerning this requested change, please contact me at (904) 630-1212 ext. 3118.

Sincerely,


Ebenezer Gujjarlapudi, P.E.
Chief

EG/RSP/rdr

c: Jacksonville Environmental Protection Board
Ms. Christi Veleta, EQD
Mr. Bert Gianazza, JEA
File: 0045K