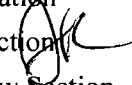


Florida Department of
Environmental Protection

Memorandum

To: Trina Vielhauer, Bureau of Air Regulation
Through: Jeff Koerner, New Source Review Section 
From: Tammy McWade, New Source Review Section
Date: October 9, 2009
Subject: Draft Air Permit No. 0310045-026-AC
JEA Northside Generating Station
Unit 3 Refurbishment Project

The Draft Permit authorizes extensive maintenance on existing Unit 3, which consists of the repair and replacement of numerous equipment including fuel oil piping, structural components, induced and forced draft fan components, steam tubing, soot-blowing components, duct work, and feed water system components. Unit 3 is a fossil fuel fired boiler with a nominal rating of 567.3 MW. It is fired with No. 6 residual fuel oil, natural gas and landfill gas. This project is subject to minor source preconstruction review and uses the new source review reform techniques. The proposed work will be conducted at the JEA Northside Generating Station, which is located in 4377 Heckscher Drive in Jacksonville, Florida. The Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for issuance. I recommend your approval of the attached Draft Permit package.

Attachments

TLV/jfk/ttm

P.E. CERTIFICATION STATEMENT

PERMITTEE

JEA
Northside Generating Station
4377 Heckscher Drive
Jacksonville, Florida

Draft Permit No. 0310045-026-AC
Unit 3 Refurbishment Project
Duval County, Florida

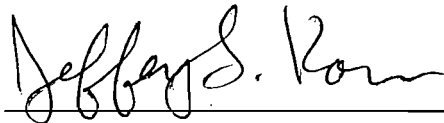
PROJECT DESCRIPTION

Unit 3 is an existing nominal 560 megawatt electric utility steam generating unit permitted to fire residual fuel oil, natural gas and landfill gas. JEA proposes extensive maintenance on existing Unit 3 to consist of the repair and replacement of numerous equipment including fuel oil piping, structural components, induced and forced draft fan components, steam tubing, soot-blowing components, duct work, and feed water system components. JEA predicts an increase in demand for power between January 2011 and December 2016. Because it may be necessary to depend on Unit 3 for a part of this projected demand, the applicant proposes additional component repairs and replacements to ensure the reliability of Unit 3. The work will be conducted during the scheduled maintenance outage to begin in the fall of 2010 and expected to be completed by January 2011.

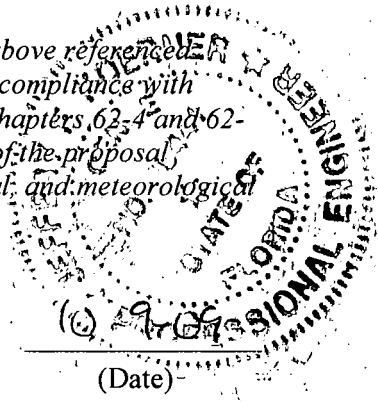
The applicant contends that the proposed maintenance and replacement of this equipment is not intended to regain lost capacity. The project will not result in any increase in the boiler heat input, fuel consumption, steam generation or emissions. The applicant maintains that the unit has no known defects or deficiencies restricting operation and the unit can currently sustain the permitted heat input rate. Records indicate that Unit 3 is currently capable of operating at permitted capacity. Based on the projections and supporting information provided by the applicant, the Department does not dispute the applicant's estimate of actual emissions increases from the project and the assertion that the project does not trigger PSD preconstruction review. Nevertheless, in accordance with Rule 62-212.300, F.A.C., the applicant must provide reports for five years after completing the project summarizing the actual emissions for each year during the 5-year period following completion of the project. This is to ensure that the project remains minor with respect to PSD preconstruction review.

The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Jeffery F. Koerner, P.E.
Registration Number 49441



(Date)



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

James M. Chansler, P.E., D.P.A. Vice President
JEA Northside Generating Station
21 West Church Street
Jacksonville, Florida 32202

Re: Project No. 0310045-026-AC
JEA Northside Generating Station
Unit 3 Refurbishment Project

Dear Mr. Chansler:

On May 18, 2009, you submitted an application requesting the extensive repair and replacement of components on existing Unit 3, a nominal 560 megawatt electric utility steam generator locate at the JEA Northside Generating Station. This existing facility is located in Duval County at 4377 Heckscher Drive in Jacksonville, Florida. Enclosed are the following documents: the Technical Evaluation and Preliminary Determination; the Draft Permit and Appendices; the Written Notice of Intent to Issue Air Permit; and the Public Notice of Intent to Issue Air Permit. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Tammy McWade at 850/488-1906 or Jeff Koerner at 850/921-9536.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

10/20/09

Date

Enclosures

TLV/jfk/ttm

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

JEA
21 West Church Street
Jacksonville, FL 32202

Project No. 0310045-026-AC
Northside Generating Station
Unit 3 Refurbishment Project
Minor Air Construction Permit
Duval County, Florida

Authorized Representative:

Mr. James M. Chansler, P.E., D.P.A. Vice President

Facility Location: JEA operates the existing Northside Generating Station, which is located in Duval County at 4377 Heckscher Drive in Jacksonville, Florida.

Project: The applicant submitted an application requesting the extensive repair and replacement of components on existing Unit 3, a nominal 560 megawatt electric utility steam generator located at the JEA Northside Generating Station. Pursuant to Rule 62-212.400, F.A.C., JEA provided information to show that the project will not exceed the significant emissions rates that require preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

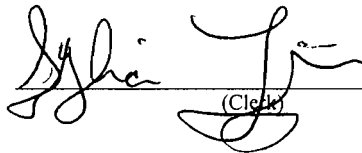
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit with Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 10/20/09 to the persons listed below.

- Mr. James Chansler, JEA (chanjm@jea.com)
- Mr. N. Bert Gianazza, JEA (gianNB@jea.com)
- Ms. Rita Felton-Smith, DEP Northeast District Office (rita.felton-smith@dep.state.fl.us)
- Mr. Richard L. Robinson, Duval County Environmental Quality Division (robinson@coj.net)
- Mr. Mike Halpin, DEP Siting Office (mike.halpin@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
- Ms Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.


(Clerk)

10/20/09
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Permit No. 0310045-026-AC
JEA Northside Generating Station
Duval County, Florida

Applicant: The applicant for this project is JEA (Jacksonville Electric Authority). The applicant's authorized representative and mailing address is: James M. Chansler, P.E., D.P.A. Vice President, Operations and Maintenance, JEA Northside Generating Station, 21 West Church Street, Jacksonville, FL 32202.

Facility Location: JEA operates the existing Northside Generating Station, which is located in Duval County at 4377 Heckscher Drive in Jacksonville, Florida.

Project: Unit 3 is an existing nominal 560 megawatt electric utility steam generating unit permitted to fire residual fuel oil, natural gas and landfill gas. JEA proposes extensive maintenance on existing Unit 3 to consist of the repair and replacement of numerous equipment including fuel oil piping, structural components, induced and forced draft fan components, steam tubing, soot-blowing components, duct work, and feed water system components. JEA predicts an increase in demand for power between January 2011 and December 2016. Because it may be necessary to depend on Unit 3 for a part of this projected demand, the applicant proposes additional component repairs and replacements to ensure the reliability of Unit 3. The work will be conducted during the scheduled maintenance outage to begin in the fall of 2010 and is expected to be completed by January 2011.

The project is not intended to regain lost capacity and will not result in any increase in the boiler heat input, fuel consumption, steam generation or emissions. There are no known defects or deficiencies restricting operation and the unit can currently sustain the permitted heat input rate. Records indicate that Unit 3 is currently capable of operating at permitted capacity. Pursuant to Rule 62-212.400, F.A.C., JEA provided information to show that the project will not exceed the significant emissions rates that require preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality. In accordance with Rule 62-212.300, F.A.C., the draft permit requires JEA to provide reports summarizing the actual emissions for each year during the 5-year period following completion of the project. This is to ensure that the project remains minor with respect to PSD preconstruction review.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless

(Public Notice to be Published in the Newspaper)

public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

JEA
21 West Church Street
Jacksonville, FL 32202

Northside Generating Station
ARMS Facility ID No. 0310045
4377 Heckscher Drive
Jacksonville, Florida

PROJECT

Project No. 0310045-026-AC
Application for Air Construction Permit
Repair and Maintenance Project

COUNTY

Duval, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
New Source Review Section
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

October 19, 2009

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial activities. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Facility Description and Location

JEA operates the existing Northside Generating Station, St. Johns River Power Park and Separation Technologies, Inc. fly ash processing system. The facility is a fossil fuel fired steam electric plant consisting of the following five boilers: Northside Generating Station (NGS) boiler Units 1 (EU-027) and 2 (EU-026) are coal and petroleum coke fired circulating fluidized bed boilers, boiler Unit 3 (EU-003) has a nominal rating of 567.3 MW and is fired with natural gas, landfill gas, No. 6 residual fuel oil, and used oil; and St. Johns River Power Park boiler Units 1 and 2 (EU-016 and EU-017) have a nominal rating of 679.6 MW and fires pulverized coal, a blend of petroleum coke and coal, new No. 2 distillate fuel oil (startup and low-load operation), and “on-specification” used oil. Northside Generating Station consists of four 62.1 MW combustion turbines, NGS Units 3, 4, 5 and 6 (EU-006 – EU-009); and an auxiliary boiler, NGS Unit 1 (EU-014). The NGS auxiliary boiler is allowed to operate when one of the main boilers is shut down or in a startup mode prior to being put on line. The operation is considered to be a single air emission facility for air permitting purposes.

The facility is an electric utility, which is categorized under Standard Industrial Classification Code No. 4911. The facility is located in Duval County at 4377 Heckscher Drive in Jacksonville, Florida. The UTM coordinates of the existing facility are Zone 17, 446.9 km East and 3359.15 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

Unit 3 (EU-003) began operation in June of 1977. It operates on residual oil, natural gas and landfill gas. Currently, Unit 3 is the only intermediate load unit that is capable of firing residual oil, which enhances its value and importance to JEA. The applicant requests authorization to conduct extensive maintenance on Unit 3 to include the repair and replacement of the following equipment:

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

- Handcuff replacement on the primary superheater elements;
- Condenser structural assessment and repairs;
- Fiberglass circulating piping assessment and repairs;
- Feed water and heater drains piping flow corrosion inspection and repairs;
- Fuel oil piping condition assessment and repairs;
- Boiler soot-blowing system piping replacement;
- No. 4 feed water heater replacement;
- Furnace left and right water-wall replacement;
- Boiler waterside chemical cleaning;
- Replacement of Digital Control System (DCS) field devices;
- 480 V motor control center (MCC) refurbishment;
- Boiler duct work repair and replacement;
- Rebuild water rack;
- East air heater to wind-box expansion joint replacement;
- Induced draft fans A and B rotor replacements;
- Upgrade drum level transmitters;
- Closed cooling strainer cabinet replacement;
- Feed water heater and boiler feed water pump valve inspection and repair;
- Force draft fan motor replacement;
- Main steam line and cold reheat line elevation sag correction;
- Boiler feed pump turbine blade replacement; and
- Other changes as appropriate to ensure safe and reliable operations of the unit that may be required.

The replacement of these various boiler components will improve the reliability of the boiler and associated system. The proposed maintenance and replacement of this equipment is not intended to regain lost capacity. The project will not result in any increase in the boiler heat input, fuel consumption, steam generation or emissions. The unit has no known defects or deficiencies restricting operation and the unit can currently sustain the permitted heat input rate. The proposed project will be coincident with the scheduled outage for Unit 3 starting in the fall of 2010 and is expected to be completed by January of 2011.

The projected operation of Unit 3 over a 5-year period following completion of the project includes a 39.7% demand growth value, which is based on the delay in startup of JEA's new electric generating facility, the Greenland Energy Center. On March 10, 2009, air construction Permit No. 0310561-001-AC (PSD-FL-401) was issued for the construction of Phase I of Greenland Energy Center. The initial phase will install two simple cycle combustion turbine electrical generator sets. JEA also submitted an application (Project No. 0310561-002-AC) to convert the two proposed simple cycle combustion turbines to a "two-on-one" combined cycle configuration (two combustion turbines with heat recovery steam generators and one common steam turbine electrical generator). However, this application was withdrawn.

Therefore, based on expected systems demands, actual operation of Unit 3 may increase during 5-year period following the project (January 2011 to December 2016) until the new Phase I of the Greenland Energy Center is

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

functional. For the proposed project, the application documents the baseline emissions from Unit 3, the projected actual emissions from Unit 3 and emissions that could have been accommodated during the baseline period prior to the repair and maintenance project. Therefore, the applicant maintains that the emissions increases due to the demand growth may be excluded, which results in no emissions increases such that the project does not trigger PSD preconstruction review.

Eventually, the plant plans to replace the electric generator rotor and assembly for Unit 3 to ensure uninterrupted electricity production. The proposed replacement will be similar to the existing equipment and designed to produce the same amount of power as before. The replacement will not increase performance or capacity of Unit 3. It will not debottleneck Unit 3. The replacement is considered separate from, and unrelated to, the boiler and associated system maintenance project. Purchase and delivery of the generator replacement components may occur outside of the proposed construction period for the maintenance project, perhaps not until the fall of 2013. This project would be addressed by a separate application for an air construction permit.

Processing Schedule

05/18/2009 Department received the application for a minor source air pollution construction permit.
06/17/2009 Department requested additional information.
07/31/2009 Department received additional information; application complete.

2. PSD APPLICABILITY

General PSD Applicability

The Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. A PSD applicability review is required in areas currently in attainment with the state and federal AAQS or areas otherwise designated as "unclassifiable". A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit: 5 tons per year or more of lead; 250 tons per year or more of any regulated air pollutant; or 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD-major facility categories (fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants, and charcoal production plants.). Projects at existing or new major stationary sources are subject to PSD preconstruction review. In addition, proposed projects at existing minor sources are subject to PSD preconstruction review if potential emissions *from the proposed project* will exceed the PSD major stationary source thresholds.

Once a project becomes subject to PSD preconstruction review, each PSD pollutant is reviewed for PSD applicability based on emissions thresholds known as the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_x); sulfur dioxide (SO₂); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM₁₀); volatile organic compounds (VOC); lead (Pb); Fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H₂S); total reduced sulfur (TRS), including H₂S; reduced sulfur compounds, including H₂S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO₂ and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as nonmethane organic compounds (NMOC); and mercury (Hg). Pollutant emissions from the project exceeding these rates are considered

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

“significant” and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

PSD Applicability for Project

The following table summarizes the applicant’s expected changes in actual emissions from the Unit 3 refurbishment project based on the application (Appendix D and Table 2-3) and the applicant’s additional information dated July 31, 2009.

Table A. Applicant’s Annual Emissions Summary and PSD Applicability

Pollutant ^a	Actual Annual Emissions, Tons/Year						Subject to PSD?
	Baseline ^b	Projected ^c	Projected Increases ^d	Excludable for Demand Growth ^e	Project Increase ^f	PSD Significant Emissions Rate	
CO	243	340	97	97	0	100	No
NO _x	1,916	2,676	760	760	0	40	No
PM	232	325	93	93	0	25	No
PM ₁₀ ^g	232	325	93	93	0	15	No
SO ₂	6,791	9,488	2,697	2,697	0	40	No
VOC	29	40	11	11	0	40	No

Notes:

- a. Calculated pollutant emissions are based on the following: AP-42 Table 1.3-1 - CO_{OIL}; AP-42 Table 1.3-3 - VOC_{OIL}; AP-42 Table 1.4-1 - CO_{NG}; AP-42 Table 1.4-2 - PM/PM_{10(NG)} and VOC_{NG, LG}; AP-42 Table 2.4-5 - PM/PM_{10(LG)} and CO_{LG}; Average of 5 years of annual stack tests - PM_{OIL}; and CEMS - NO_x and SO₂.
- b. Baseline actual emissions were calculated as the annual average of the highest consecutive two years of operation in the last five years (May 2004 – April 2006).
- c. Projected actual emissions were calculated by scaling up the baseline emissions by 39.7%, which is the projected demand growth rate for the highest year in the projected 5-year period after completing the project. This assumes that the percentage of each fuel fired will remain the same as the baseline period.
- d. The projected emissions increase is the difference between projected actual emissions and baseline actual emissions.
- e. When determining projected actual emissions, Rule 62-210.200(250), F.A.C. states that the Department ... “... Shall exclude that portion of the unit’s emissions following the project that an existing unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions and that are also unrelated to the particular project including any increased utilization due to product demand growth.” Since Unit 3 is currently capable of operating at maximum permitted capacity given sufficient demand, all of the actual emissions resulting from the increased utilization of Unit 3 due to product demand growth shall be excluded from projected actual emissions. For this case, the applicant excluded all of the emissions resulting from the predicted 39.7% increase in operation to meet the predicted demand growth for the highest year in the projected 5-year period after completing the project.
- f. The project increase is the projected actual emissions minus the baseline actual emissions minus the excludable actual emissions due to demand growth.
- g. Assumes all PM is PM₁₀.

Appendix D of the application provides data showing the actual heat input rate from firing residual oil, natural gas and landfill gas from January 2008 through April 2009. The data collected during this period of time shows that the unit is capable of achieving the maximum permitted heat input rate for Unit 3 prior to the proposed project. The proposed project will not regain lost capacity or increase the performance or capacity of Unit 3. Therefore, the portion of the unit's actual emissions after completing the refurbishment project may be excluded and the project will not result in emissions increases above the PSD significant emissions rates.

3. DEPARTMENT REVIEW

Brief Discussion of Emissions and PSD Applicability

Unit 3 is scheduled for an outage to conduct annual maintenance beginning in the fall of 2010. The applicant predicts an increase in demand for power between January 2011 and December 2016. Because of the delay in startup of JEA's new electric generating facility, the Greenland Energy Center, the applicant plans to meet at least a portion of this demand by operating Unit 3 approximately 39.7% more for the projected highest year of the 5-year period following the completion of the project. Because it is necessary to depend on Unit 3 for a part of this projected demand, the applicant proposes additional component repairs and replacements to ensure the reliability of Unit 3 during this period.

Rule 62-210.200(250), F.A.C. includes the following criteria in the definition of *projected actual emissions*, "In determining the projected actual emissions, the Department ... shall exclude that portion of the unit's emissions following the project that an existing unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions and that are also unrelated to the particular project including any increased utilization due to product demand growth." To show that Unit 3 could have accommodated the increased operation due to demand growth, the applicant provided a summary of days and times between January 3, 2008 and April 30, 2009 during which Unit 3 operated within 90% of the maximum heat input rate. For example, between February 5, 2009 and February 6, 2009, Unit 3 operated 21 consecutive hours above 4511 MMBtu per hour, which is within 90% of the maximum heat input rate. During this period, 19 hours were above 95% of the maximum heat input rate.

In June of 1999, when permitting the construction of coal-fired fluidized bed combustors to re-power the steam-electrical generators for Units 1 and 2, JEA agreed to the following specific "Community Commitment Emission Levels" for combined operation of Units 1, 2 and 3.

Pollutant	Tons/year
NO _x	3600
PM/PM ₁₀	881
SO ₂	12,284

These commitments represent a 10% reduction in actual annual emissions from Units 1, 2 and 3 estimated for 1994 and 1995. Since Units 1 and 2 are base-loaded units, this helps ensure that Unit 3 will be dispatched only as necessary so that the combined actual emissions for Units 1 - 3 remain below the Community Commitment Emission Levels.

The applicant contends that the proposed maintenance and replacement of this equipment is not intended to regain lost capacity. The project will not result in any increase in the boiler heat input, fuel consumption, steam generation or emissions. The applicant maintains that the unit has no known defects or deficiencies restricting operation and the unit can currently sustain the permitted heat input rate. Records indicate that Unit 3 is currently capable of operating at permitted capacity. Based on the projections and supporting information provided by the applicant, the Department does not dispute the applicant's estimate of actual emissions increases from the project and the assertion that the project does not trigger PSD preconstruction review. Nevertheless, in accordance with Rule 62-212.300, F.A.C., the applicant must provide reports for five years after completing the project summarizing the actual emissions for each year during the 5-year period following completion of the project.

NSPS Applicability

A project for an existing unit may trigger the federal New Source Performance Standards (NSPS) in two ways.

1. The project is considered a modification when the project results in an increase in the hourly mass emissions rate of an NSPS-regulated pollutant. Since this project will not change the performance or increase the capacity (heat input rate, fuel consumption rate or steam generation rate) of Unit 3, the hourly mass emissions rates will not increase.
2. Pursuant to 40 CFR 60.15, a project is considered reconstruction when the fixed capital costs of the replacement components exceed 50% of the fixed capital costs for a comparable new replacement unit. The applicant estimates a cost of \$22,660,000 for the proposed component replacement and maintenance items on Unit 3. The estimated component cost for the replacement of the Unit 3 electric generator rotor and assembly is \$6,104,000. The applicant predicts that the fixed replacement cost for a comparable 560 MW oil-fired boiler is \$716,850,000. Therefore, the total project costs will be less than 50% of the cost of a comparable replacement unit and the project is not considered reconstruction for purposes of the NSPS.

Therefore, the project requires a minor air construction permit to authorize the component repairs and replacements for Unit 3. Pursuant to Rule 62-212.300(1)(e), F.A.C., the applicant shall provide reports in summarizing actual emissions (CO, NO_x, PM, PM₁₀, SO₂ and VOC) computed in accordance with the requirements of Rule 62-210.370, F.A.C. for each year during the 5-year period following completion of the project. The applicant is reminded that an application for an air construction permit is required for authorization to replace the electric generator rotor and assembly for Unit 3, which is tentatively planned for 2013.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Tammy McWade is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

PERMITTEE

JEA
21 West Church Street
Jacksonville, FL 32202

Authorized Representative:
Mr. James M. Chansler, P.E., D.P.A. Vice President

Air Permit No. 0310045-026-AC
Permit Expires: September 1, 2011

Northside Generating Station
ARMS ID No. 0310045
Unit 3 Refurbishment Project

PROJECT AND LOCATION

This permit authorizes repair and replacement of components on existing Unit 3, a nominal 560 megawatt (MW) electric utility steam generating unit. The proposed work will be conducted at the Northside Generating Station, which is an electric utility power plant (Standard Industrial Classification No. 4911). The existing facility is located in Duval County at 4377 Heckscher Drive in Jacksonville, Florida. The UTM coordinates are Zone 17; 446.9 km East; 3359.15 km North.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.); and . The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

Executed in Tallahassee, Florida

(DRAFT)

Joseph Kahn, Director
Division of Air Resource Management

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY DESCRIPTION

JEA operates the existing Northside Generating Station, St. Johns River Power Park and Separation Technologies, Inc. fly ash processing system. The fossil fuel fired steam electric plant consists of the following equipment:

- Northside Generating Station: Unit 1 (EU-027) and Unit 2 (EU 026), which are coal and petroleum coke fired circulating fluidized bed boilers; Unit 3 (EU-003), which is a nominal 560 MW electric utility steam generating unit fired with natural gas, residual fuel oil, landfill gas and used oil; four 62.1 MW combustion turbine Units 3, 4, 5 and 6 (EU-006 – EU-009); and an auxiliary boiler (EU-014).
- St. Johns River Power Park: Unit 1 (EU-016) and Unit 2 (EU-017), which are nominal 680 MW units fired with pulverized coal, a blend of petroleum coke and coal, distillate oil (startup and low-load operation) and “on-specification” used oil.
- A fly ash processing system operated by Separation Technologies, Inc.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PROJECT DESCRIPTION

Unit 3 (Emissions Unit EU-003) is an existing nominal 560 megawatt electric utility steam generating unit permitted to fire residual fuel oil, natural gas and landfill gas. JEA proposes extensive maintenance on existing Unit 3 to consist of the repair and replacement of numerous equipment including fuel oil piping, structural components, induced and forced draft fan components, steam tubing, soot-blowing components, duct work, and feed water system components. JEA predicts an increase in demand for power between January 2011 and December 2016. Because it may be necessary to depend on Unit 3 for a part of this projected demand, the applicant proposes additional component repairs and replacements to ensure the reliability of Unit 3 during the scheduled maintenance outage to begin in the fall of 2010 and expected to be completed by January 2011.

The project is not intended to regain lost capacity and will not result in any increase in the boiler heat input, fuel consumption, steam generation or emissions. There are no known defects or deficiencies restricting operation and the unit can currently sustain the permitted heat input rate. Records indicate that Unit 3 is currently capable of operating at permitted capacity. Pursuant to Rule 62-212.400, F.A.C., JEA provided information to show that the project will not exceed the significant emissions rates that require preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality. In accordance with Rule 62-212.300, F.A.C., the draft permit requires JEA to provide reports summarizing the actual emissions for each year during the 5-year period following completion of the project. This is to ensure that the project remains minor with respect to PSD preconstruction review.

Eventually, the plant plans to replace the electric generator rotor and assembly for Unit 3 to ensure uninterrupted electricity production. Purchase and delivery of the generator replacement components may occur outside of the proposed construction period for the maintenance project, perhaps not until fall of 2013. A separate application for an air construction permit is required for generator component replacement project.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. **Permitting Authority:** The permitting authority for this project is the Bureau of Air Regulation, Division of Air Resource Management, Florida Department of Environmental Protection (Department). The Bureau of Air Regulation's mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. **Compliance Authority:** All documents related to compliance activities such as reports, tests, and notifications shall be submitted to: Air Quality Branch, Environmental Quality Division, Environmental and Compliance Department, City of Jacksonville, 407 North Laura Street, 3rd Floor, Jacksonville, Florida 32202 and Phone 904/255-7100.
3. **Appendices:** The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions; and
 - d. Appendix D. Common Testing Requirements
4. **Applicable Regulations, Forms and Application Procedures:** Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. **New or Additional Conditions:** For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. **Modifications:** The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1) (a), F.A.C.]
7. **Source Obligation:**
 - a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]
8. **Application for Title V Permit:** This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. FOSSIL FUEL-FIRED STEAM GENERATOR (EU 003)

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
003	Northside Generating Station Unit 3 is a fossil fuel-fired steam generator with a nominal nameplate rating of 563.7 MW.

Northside Generating Station Unit 3 began commercial operation in 1977. It is a fossil fuel-fired steam generator with a nominal nameplate rating of 563.7 megawatts (electric). The unit fires No. 6 residual fuel oil, natural gas, liquefied petroleum gas (LPG), "on-specification" used oil, landfill gas and blends of fuel oil/natural gas/landfill gas. The maximum heat input rates are: 5033 million British thermal units (MMBtu) per hour when firing fuel oil; 5260 MMBtu per hour when firing natural gas or natural gas/landfill gas; or 5033 - 5260 MMBtu per hour when firing blends fuel oil/natural gas/landfill gas. LPG is used as the igniter fuel when natural gas is not available. Fuel additives (e.g., magnesium oxide, hydroxide or sulfonate or calcium nitrate origin) are used to enhance combustion and/or control acidity. Pollutant emissions from this emissions unit are uncontrolled. The combustion gases exhaust through a stack that is 300 feet tall. Sulfur dioxide (SO₂) and nitrogen oxides (NO_x) are monitored with continuous emissions monitoring systems (CEMS).

{Permitting Notes: This emissions unit is regulated under: Phase II of the Acid Rain Program; Rule 62-296.405(1), F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input; Rule 62-296.702, F.A.C., Reasonably Available Control Technology (RACT) Particulate Matter, Fossil Fuel Steam Generators; Permit No. AC16-85951; Permit No. 0310045-012-AC; and Rule 62-296.470, F.A.C., Clean Air Interstate Rule (CAIR).}

PORPOSED WORK

1. Unit 3: The permittee is authorized to conduct maintenance on Unit 3 including the repair and replacement of the following equipment:
 - Handcuff replacement on the primary superheater elements;
 - Condenser structural assessment and repairs;
 - Fiberglass circulating piping assessment and repairs;
 - Feed water and heater drains piping flow corrosion inspection and repairs;
 - Fuel oil piping condition assessment and repairs;
 - Boiler soot-blowing system piping replacement;
 - No. 4 feed water heater replacement;
 - Furnace left and right water-wall replacement;
 - Boiler waterside chemical cleaning;
 - Replacement of Digital Control System (DCS) field devices;
 - 480 V motor control center (MCC) refurbishment;
 - Boiler duct work repair and replacement;
 - Rebuild water rack;
 - East air heater to wind-box expansion joint replacement;
 - Induced draft fans A and B rotor replacements;

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. FOSSIL FUEL-FIRED STEAM GENERATOR (EU 003)

- Upgrade drum level transmitters;
- Closed cooling strainer cabinet replacement;
- Feed water heater and boiler feed water pump valve inspection and repair;
- Force draft fan motor replacement;
- Main steam line and cold reheat line elevation sag correction;
- Boiler feed pump turbine blade replacement; and
- Other changes as appropriate to ensure safe, reliable operations of the unit will be required.

[Application No. 0310045-026-AC]

PERFORMANCE RESTRICTIONS

2. Capacities and Fuels: The proposed work shall not result in any increase in the boiler heat input rate, fuel consumption rates and steam generation rates. [Rule 62-4.070(3), F.A.C. and Application No. 0310045-026-AC]

TESTING REQUIREMENTS

3. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and the project avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.
 - a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
 - b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
 - (1). The name, address and telephone number of the owner or operator of the major stationary source;
 - (2). The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
 - (3). If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
 - (4). Any other information that the owner or operator wishes to include in the report.
 - c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.
 - d. For this project, the permittee estimated the following baseline actual emissions: 243 tons/year of carbon monoxide (CO); 1,916 tons/year of NO_x; 6,791 tons/year of SO₂; 232 tons/year of particulate matter (PM), 232 tons/year particulate matter of 10 microns or less (PM₁₀); and 29 tons/year of volatile organic compounds (VOC).
 - e. The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. as provide by Appendix C of this permit. For this project, the permittee shall use the following

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. FOSSIL FUEL-FIRED STEAM GENERATOR (EU 003)

methods in reporting the actual annual emissions for Unit 3:

- (1). The permittee shall use data collected from the CEMS to determine and report the actual annual emissions of SO₂ and NO_x.
- (2). The permittee shall use the data collected from the required stack tests to determine and report the actual annual emissions of PM/PM₁₀. The permittee shall follow the stack test methods, test procedures and test frequencies specified in the current Title V air operation permit.
- (3). Unless otherwise approved by the Department, the permittee shall use the same emissions factors for reporting the actual annual emissions of CO and VOC as used in the application to establish baseline emissions.
- (4). As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.

[Application No. 0310045-026-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

SECTION 4. APPENDICES (DRAFT)

Contents

- Appendix A. Citation Formats and Glossary of Common Terms
- Appendix B. General Conditions
- Appendix C. Common Conditions
- Appendix D. Common Testing Requirements

Citation Formats and Glossary of Common Terms

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
 “AO” identifies the permit as an Air Operation Permit
 “123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
 “2222” represents the specific facility ID number for that county
 “001” identifies the specific permit project number
 “AC” identifies the permit as an air construction permit
 “AF” identifies the permit as a minor source federally enforceable state operation permit
 “AO” identifies the permit as a minor source air operation permit
 “AV” identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality
 “FL” means that the permit was issued by the State of Florida
 “317” identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

µg: microgram

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System
 (Department’s database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

SECTION 4. APPENDIX A (DRAFT)

Citation Formats and Glossary of Common Terms

CAA: Clean Air Act	NESHAP: National Emissions Standards for Hazardous Air Pollutants
CMS: continuous monitoring system	NO_x: nitrogen oxides
CO: carbon monoxide	NSPS: New Source Performance Standards
CO₂: carbon dioxide	O&M: operation and maintenance
COMS: continuous opacity monitoring system	O₂: oxygen
DARM: Division of Air Resource Management	Pb: lead
DEP: Department of Environmental Protection	PM: particulate matter
Department: Department of Environmental Protection	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
dscf: dry standard cubic feet	ppm: parts per million
dscfm: dry standard cubic feet per minute	ppmv: parts per million by volume
EPA: Environmental Protection Agency	ppmvd: parts per million by volume, dry basis
ESP: electrostatic precipitator (control system for reducing particulate matter)	QA: quality assurance
EU: emissions unit	QC: quality control
F: fluoride	PSD: prevention of significant deterioration
F.A.C.: Florida Administrative Code	psi: pounds per square inch
F.A.W.: Florida Administrative Weekly	PTE: potential to emit
F.D.: forced draft	RACT: reasonably available control technology
F.S.: Florida Statutes	RATA: relative accuracy test audit
FGD: flue gas desulfurization	RBLC: EPA's RACT/BACT/LAER Clearinghouse
FGR: flue gas recirculation	SAM: sulfuric acid mist
ft²: square feet	scf: standard cubic feet
ft³: cubic feet	scfm: standard cubic feet per minute
gpm: gallons per minute	SIC: standard industrial classification code
gr: grains	SIP: State Implementation Plan
HAP: hazardous air pollutant	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
Hg: mercury	SO₂: sulfur dioxide
I.D.: induced draft	TPD: tons/day
ID: identification	TPH: tons per hour
kPa: kilopascals	TPY: tons per year
lb: pound	TRS: total reduced sulfur
MACT: maximum achievable technology	UTM: Universal Transverse Mercator coordinate system
MMBtu: million British thermal units	VE: visible emissions
MSDS: material safety data sheets	VOC: volatile organic compounds
MW: megawatt	

SECTION 4. APPENDIX B (DRAFT)

General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

General Conditions

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rules 624.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology;
 - b. Determination of Prevention of Significant Deterioration; and
 - c. Compliance with New Source Performance Standards.
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

RECORDS AND REPORTS

10. **Records Retention:** All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
11. **Emissions Computation and Reporting**
 - a. **Applicability.** This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance

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with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]

- b. *Computation of Emissions.* For any of the purposes set forth in subsection 62-210.370(1), F.A.C.; the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
- (1) *Basic Approach.* The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
- (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
- (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (2) *Continuous Emissions Monitoring System (CEMS).*
- (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
- 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
- 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
- (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
- 1) A calibrated flow meter that records data on a continuous basis, if available; or
- 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- (3) *Mass Balance Calculations.*
- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
- 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and

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- 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
 - (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
 - (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- (4) Emission Factors.
- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
 - 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
 - b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- (7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

[Rule 62-210.370(2), F.A.C.]

c. *Annual Operating Report for Air Pollutant Emitting Facility*

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
 - a. All Title V sources.
 - b. All synthetic non-Title V sources.
 - c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
 - d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.
- (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.
- (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
- (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

SECTION 4. APPENDIX D (DRAFT)

Common Testing Requirements

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units that require testing.

COMPLIANCE TESTING REQUIREMENTS

1. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
2. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. [Rule 62-297.310(2), F.A.C.]
3. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
4. Applicable Test Procedures:
 - a. Required Sampling Time.
 - (1) Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
 - (2) Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - (a) For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
 - (b) The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
 - (c) The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
 - b. Minimum Sample Volume. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.

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Common Testing Requirements

- c. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.
- d. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.
- e. Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calibration liquid in glass	5° F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5° F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/- 0.001" mean of at least three readings; Max. deviation between readings, 0.004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, when 5% change observed, annually	Spirometer or calibrated wet test or dry gas test meter	2%
	2. One Point: Semiannually		
	3. Check after each test series	Comparison check	5%

[Rule 62-297.310(4), F.A.C.]

5. Determination of Process Variables:

- a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

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Common Testing Requirements

6. **Sampling Facilities:** The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must also comply with all applicable Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.
- a. **Permanent Test Facilities.** The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.
 - b. **Temporary Test Facilities.** The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.
 - c. **Sampling Ports.**
 - (1) All sampling ports shall have a minimum inside diameter of 3 inches.
 - (2) The ports shall be capable of being sealed when not in use.
 - (3) The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
 - (4) For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.
 - (5) On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.
 - d. **Work Platforms.**
 - (1) Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.
 - (2) On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.
 - (3) On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.
 - (4) All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toe board, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.
 - e. **Access to Work Platform.**
 - (1) Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.
 - (2) Walkways over free-fall areas shall be equipped with safety rails and toe boards.
 - f. **Electrical Power.**

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- (1) A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.
- (2) If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

g. Sampling Equipment Support.

- (1) A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.
 - (a) The bracket shall be a standard 3 inch × 3 inch × one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.
 - (b) A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.
 - (c) The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.
- (2) A complete monorail or dual rail arrangement may be substituted for the eyebolt and bracket.
- (3) When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

7. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

a. General Compliance Testing.

1. The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit.
2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to sub-subparagraph 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - (a) Did not operate; or
 - (b) In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours,
4. During each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

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Common Testing Requirements

- (a) Visible emissions, if there is an applicable standard;
 - (b) 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 air pollutant; and
 - (c) Each NESHAP pollutant, if there is an applicable emission standard.
- 5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.
 - 6. For fossil fuel steam generators on a semi-annual particulate matter emission compliance testing schedule, a compliance test shall not be required for any six-month period in which liquid and/or solid fuel is not burned for more than 200 hours other than during startup.
 - 7. For emissions units electing to conduct particulate matter emission compliance testing quarterly pursuant to paragraph 62-296.405(2)(a), F.A.C., a compliance test shall not be required for any quarter in which liquid and/or solid fuel is not burned for more than 100 hours other than during startup.
 - 8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
 - 9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
 - 10. An annual compliance test conducted for visible emissions shall not be required for units exempted from air permitting pursuant to subsection 62-210.300(3), F.A.C.; units determined to be insignificant pursuant to subparagraph 62-213.300(2)(a)1., F.A.C., or paragraph 62-213.430(6)(b), F.A.C.; or units permitted under the General Permit provisions in paragraph 62-210.300(4)(a) or Rule 62-213.300, F.A.C., unless the general permit specifically requires such testing.
 - (a) **Special Compliance Tests.** When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
 - (b) **Waiver of Compliance Test Requirements.** If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of paragraph 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.]

REPORTS

8. Test Reports:

- a. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- b. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

SECTION 4. APPENDIX D (DRAFT)**Common Testing Requirements**

- c. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information.
- (1) The type, location, and designation of the emissions unit tested.
 - (2) The facility at which the emissions unit is located.
 - (3) The owner or operator of the emissions unit.
 - (4) The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 - (5) The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 - (6) The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 - (7) A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 - (8) The date, starting time and duration of each sampling run.
 - (9) The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
 - (10) The number of points sampled and configuration and location of the sampling plane.
 - (11) For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
 - (12) The type, manufacturer and configuration of the sampling equipment used.
 - (13) Data related to the required calibration of the test equipment.
 - (14) Data on the identification, processing and weights of all filters used.
 - (15) Data on the types and amounts of any chemical solutions used.
 - (16) Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
 - (17) The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
 - (18) All measured and calculated data required to be determined by each applicable test procedure for each run.
 - (19) The detailed calculations for one run that relate the collected data to the calculated emission rate.
 - (20) The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
 - (21) A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

MISCELLANEOUS

9. Stack and Duct: The terms stack and duct are used interchangeably in this rule. [Rule 62-297.310(9), F.A.C.]

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Tuesday, October 20, 2009 1:23 PM
To: 'chanjm@jea.com'
Cc: 'gianNB@jea.com'; Felton-Smith, Rita; 'robinson@coj.net'; Halpin, Mike; 'forney.kathleen@epa.gov'; 'oquendo.ana@epa.gov'; 'abrams.heather@epa.gov'; Gibson, Victoria; Koerner, Jeff; McWade, Tammy; Walker, Elizabeth (AIR)
Subject: JEA - Northside Generating Station; 0310045-026-AC
Attachments: 0310045-026-AC_Intent.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0310045.026.AC.D_pdf.zip

Owner/Company Name: JEA

Facility Name: NORTHSIDE/SJRPP

Project Number: 0310045-026-AC

Permit Status: DRAFT

Permit Activity: CONSTRUCTION / Unit 2 Refurbishment Project

Facility County: DUVAL

Processor: Tammy McWade

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Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Chansler, James M. - Chief Operating Officer [ChanJM@jea.com]
To: Livingston, Sylvia
Sent: Tuesday, October 20, 2009 1:58 PM
Subject: Read: JEA - Northside Generating Station; 0310045-026-AC

Your message

To: ChanJM@jea.com
Subject:

was read on 10/20/2009 1:58 PM.

Livingston, Sylvia

From: Gianazza, N. Bert [GianNB@jea.com]
Sent: Tuesday, October 20, 2009 3:27 PM
To: Livingston, Sylvia
Subject: RE: JEA - Northside Generating Station; 0310045-026-AC

Sylvia,

My R.O. and I have received this email and can view the documents.

Thanks, Bert

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Tuesday, October 20, 2009 1:23 PM
To: Chansler, James M. - Chief Operating Officer
Cc: Gianazza, N. Bert; Felton-Smith, Rita; robinson@coj.net; Halpin, Mike; forney.kathleen@epa.gov; oquendo.ana@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; Koerner, Jeff; McWade, Tammy; Walker, Elizabeth (AIR)
Subject: JEA - Northside Generating Station; 0310045-026-AC

Dear Sir/ Madam:

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http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0310045.026.AC.D_pdf.zip

Owner/Company Name: JEA
Facility Name: NORTHSIDE/SJRPP
Project Number: 0310045-026-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION / Unit 2 Refurbishment Project
Facility County: DUVAL
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Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any

Livingston, Sylvia

From: Robinson, Richard [ROBINSON@coj.net]
Sent: Tuesday, October 20, 2009 3:47 PM
To: Livingston, Sylvia
Cc: Hunter Barnes, Gloria
Subject: RE: JEA - Northside Generating Station; 0310045-026-AC

Sylvia,

I was able to access the subject documents through the e-mail link below.

Thanks,

Richard

Richard L. Robinson, P.E.

Environmental Engineering Manager
Environmental Quality Division
City of Jacksonville, Florida
407 North Laura Street, Third Floor
Jacksonville, FL 32202
Phone: (904) 255-7201
Fax: (904) 588-0518
E-Mail: robinson@coj.net

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Please note: that under Florida's very broad public records law, e-mail communications to and from City officials may be subject to public disclosure.



Please consider the environment before printing this email.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Tuesday, October 20, 2009 1:23 PM
To: chanjm@jea.com
Cc: gianNB@jea.com; Felton-Smith, Rita; Robinson, Richard; Halpin, Mike; forney.kathleen@epa.gov; oquendo.ana@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; Koerner, Jeff; McWade, Tammy; Walker, Elizabeth (AIR)
Subject: JEA - Northside Generating Station; 0310045-026-AC

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Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>>

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