

21 West Church Street  
Jacksonville, Florida 32202-3139

November 30, 2005

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DEC 01 2005

BUREAU OF AIR REGULATION



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

ELECTRIC

Subject: JEA Northside Generating Station (0310045-011-AV)  
Installation of Black Start Emergency Generators

WATER

Dear Ms. Vielhauer:

SEWER

JEA is planning on moving two existing diesel fuel fired, 2,307 hp emergency black start engines and the associated 3,000 gallon diesel fuel storage tank to the JEA Northside Generating Station (NGS) from the JEA Kennedy Generating Station. The two black start engines will be used to start the NGS combustion turbines only when facility electrical power is not available for that purpose. As such, the black start diesel generators are considered emergency generators. The engines will also be operated for a brief period each month for maintenance and reliability purposes.

Because the emergency black start engines are considered emergency generators, their installation at NGS qualifies for a permitting exemption under Rule 62-210.300(3)(a)20, F.A.C. Rule 62-210.300(3)(a)20, F.A.C. indicates that "a facility, emissions unit, or pollutant-emitting activity shall be exempt from the permitting requirements of this chapter, Chapters 62-212 and 62-4, F.A.C., if it satisfies the applicable criteria of paragraph 62-210.300(3)(a) or (b), F.A.C., or if it has been exempted from permitting pursuant to Rule 62-4.040, F.A.C." It further indicates that "Any proposed new emissions unit or activity that would be exempt from permitting under this rule shall not be required to obtain an air construction permit pursuant to this chapter, Chapter 62-212 or 62-4, F.A.C., even if such unit or activity would be contained within a Title V source." Emergency generators are given a categorical exemption under Rule 62-210.300(3)(a)20. As such, the installation of the two black start engines is exempt from the requirement to obtain a construction permit. Further, the black start engines are not subject to any new source performance standards (NSPS) or maximum achievable control technology (MACT) standards as discussed below.

#### **New Source Performance Standard (NSPS) applicability**

There is a proposed New Source Performance Standard (NSPS) for Stationary Compression Ignition Internal Combustion Engines that was published in the Federal Register on July 11, 2005. The proposed subpart would be located at 40 CFR Part 60 Subpart IIII. Proposed Subpart IIII would be applicable to all owners or operators of stationary compression ignition internal combustion engines that commence construction, modification or reconstruction after July 1, 2005. Under the NSPS General Provisions in 40 CFR 60 Subpart A, relocation of an existing emissions unit does not constitute a modification under the NSPS definition. Therefore, the black start engines predate the applicability date of this proposed NSPS and as such, are not subject to proposed Subpart IIII.

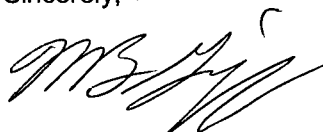
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**MACT Standard applicability**

The maximum achievable control technology (MACT) standard for stationary reciprocating internal combustion engines (RICE) is found at 40 CFR 63 Subpart ZZZZ. This MACT standard is applicable to stationary RICE at a major source of HAP emissions. However, per 40 CFR 63.6590(b)(3), a stationary RICE which is an existing emergency stationary RICE does not have to meet the requirements of Subpart ZZZZ and of 40 CFR 63 Subpart A. Because the black start engines meet the definition of emergency stationary RICE given at 40 CFR 63.6675, the black start engines are not subject to Subpart ZZZZ.

We are requesting written concurrence that no permitting is required regarding this matter and that the black start emergency generators be added to the Northside Title V permit as an insignificant activity. If you have any questions, please call me at (904) 665-6247.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Bert Gianazza', written in a cursive style.

N. Bert Gianazza, P.E.  
Environmental Services

cc: Bruce Mitchell, FDEP  
Steve Pace, P.E., EQD