



June 24, 2010

Mr. Robert Bull, P.E.
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

093-87718

JUN 28 2010

BUREAU OF
AIR REGULATION

RE: PROJECT NO. 0310045-029-AC
ST. JOHNS RIVER POWER PARK UNITS 1 & 2
COMMENTS ON DRAFT PERMIT

Dear Mr. Bull:

On behalf of Jacksonville Electric Authority (JEA)/St. Johns River Power Park (SJRPP) we offer the following comments for consideration. As you will note, the comments are very minor and will not materially affect the Florida Department of Environmental Protection's (FDEP's) analysis and conditions.

Draft Permit, Pages 5 of 6 and 6 of 6, Section 3, Emissions Unit Specific Conditions (Draft), Condition 3, Nitrogen Oxides (NO_x). There were minor references to the Code of Federal Regulation (CFR) that should be updated in the final permit to reflect the precise citations in the CFR. These are as follows:

Condition 3: (1) "0.20 lb/MMBtu [40 CFR 60.44Da(a)(1)]", {Changed from 40 CFR 60.44a(b)(1) in draft permit.}

Condition 3: (2) "25 percent reduction [40 CFR 60.44Da(a)(2)]." {Changed from 40 CFR 60.44a(b)(2) in draft permit.} "Compliance with the NO_x emission limitation under 40 CFR 60.44Da(a)(1) constitutes compliance with the percent reduction requirements under 60.44Da(a)(2). [40 CFR 60.48Da(b)]" {Change from 40 CFR 60.48d(b)}

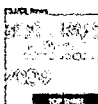
Condition 4: Change the reference to [40 CFR 60.44Da(c)] {Changed from 40 CFR 60.44a(c)}

Condition 5: Change the reference to [40 CFR 60.48Da(g)(1)] {Changed from 40 CFR 60.48a(g)}

Technical Evaluation and Preliminary Determination (TE&PD). There are minor values that were noted to be different from the information submitted. However, these did not change FDEP's analysis.

On Page 3 of 5 in the Project Description, Last Paragraph the natural gas quantity of 12,533 MMscf/year should be 12,000 MMscf/year based on the natural gas heat content of 1022 Btu/scf (see Segment 3 of 4 in the application. The calculation is based on the annual heat input of 12,264,000 MMBtu/year (700 MMBtu/hr/unit x 2 units x 8,760 hours/year). The difference, however, does not change FDEP's analysis in the TE&PD.

On Page 5 of 5 in the emission factor table showing baseline actual emissions and projected actual emissions the projected actual emission factor in lb/MMBtu shown as 0.02 for NO_x should have been 0.20 based on the subsequent information submitted in April 2010. However, this is still much less than the baseline actual of 0.42 lb/MMBtu and does not change FDEP's conclusions.



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Golder Associates: Operations in Africa, Asia, Australasia, Europe, North America and South America

If you have any questions, please do not hesitate to call us at (352) 336-5600 or via email (kkosky@golder.com and smohammad@golder.com).

Sincerely,

GOLDER ASSOCIATES INC.



Kennard Kosky, P.E.
Principal Engineer



Salahuddin K. Mohammad
Senior Project Engineer

cc: cc: B. Gianazza, JEA
J. Worley, JEA

KFK/SKM/tlc

Walker, Elizabeth (AIR)

From: Bull, Robert
Sent: Friday, June 25, 2010 7:34 AM
To: Walker, Elizabeth (AIR)
Subject: FW: JEA/SJRPP Draft Air Permit No. 0310045-029-AC
Attachments: L062410_718.pdf

I responded this morning that the hard copy would need to be received by Monday. Thanks

From: Mohammad, Sal [mailto:Sal_Mohammad@golder.com]
Sent: Thursday, June 24, 2010 4:47 PM
To: Bull, Robert
Cc: Kosky, Ken; GNV- Document Production; Gianazza, N. Bert
Subject: RE: JEA/SJRPP Draft Air Permit No. 0310045-029-AC

Bobby,
Please see attached the signed comments letter. Let me know if you have any questions.

Regards,
Sal

From: Bull, Robert [mailto:Robert.Bull@dep.state.fl.us]
Sent: 2010-06-24 15:07
To: Kosky, Ken
Cc: Gianazza, N. Bert; Worley, Jay A. - Director, Environmental Programs; Mohammad, Sal
Subject: RE: JEA/SJRPP Draft Air Permit No. 0310045-029-AC

Thank you Ken. Please send the signed copy of the comments to me. Per the public notice, please have these comments to me by Monday, no later than 5pm. If you have any questions, please contact me. Bert has sent the electronic copy of the proof of publication, and the notarized hard copy will be sent to me, too.

Thank you,

Bobby

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Kosky, Ken [mailto:Ken_Kosky@golder.com]
Sent: Thursday, June 24, 2010 2:40 PM
To: Bull, Robert
Cc: Gianazza, N. Bert; Worley, Jay A. - Director, Environmental Programs; Mohammad, Sal
Subject: JEA/SJRPP Draft Air Permit No. 0310045-029-AC

Dear Bobby: On behalf of JEA/SJRPP we offer the following comments for consideration. As you will note, the comments are very minor and will not materially affect the Department's analysis and conditions. Please let us know if you have any questions. If these comments need to be transmitted via a signed letter I will send one tomorrow. Please let me know. Also, an electronic copy of the public notice will be forwarded to you by Bert Gianazza with the official copy sent by mail. Regards, Ken

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Condition 3: (2) "25 percent reduction [40 CFR 60.44Da(a)(2)]." {Changed from 40 CFR 60.44a(b)(2) in draft permit.} "Compliance with the NOx emission limitation under 40 CFR 60.44Da(a)(1) constitutes compliance with the percent reduction requirements under 60.44Da(a)(2). [40 CFR 60.48Da(b)]" {Change from 40 CFR 60.48d(b)}

Condition 4: Change the reference to [40 CFR 60.44Da(c)] {Changed from 40 CFR 60.44a(c)}

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