



# 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

March 3, 2010

*Sent by Electronic Mail – Received Receipt Requested*

Mr. Michael J. Brost  
Vice President – Electric System  
JEA  
St. Johns River Power Park  
21 West Church Street  
Jacksonville, Florida 33202

Re: Project No. 0310045-029-AC  
Request for Additional Information  
St. Johns River Power Park, Units 1 and 2  
Request to Authorize Continuous Firing of Natural Gas During Normal Operations

Dear Mr. Brost:

On February 9, 2010, the Department received a request for an air construction permit to authorize continuous firing of natural gas during normal operations. Initial construction was authorized under PSD-FL-010. The application is incomplete. Based on our review of the proposed project, we have determined that the following additional information is needed in order to continue processing this request. Please provide all assumptions, calculations and reference materials that are used or reflected in any of your responses to the following issues:

1. Please provide a regulatory applicability determination regarding the New Source Performance Standards at 40 CFR 60, Subpart Da, for the firing of natural gas (NG) in Units 1 and 2. If any of the application pages need to be updated, then complete the pages and resubmit.
2. If necessary, please update the project discussion and/or Table 5, Part II of the application.

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction Review); and 62-212.400 (Prevention of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

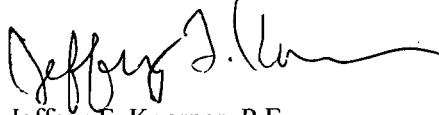
We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C., requires applicants to respond to requests for information within 90 days or to provide a

REQUEST FOR ADDITIONAL INFORMATION

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written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact the project engineer, Bruce Mitchell, at 850/413-9198.

Sincerely,



Jeffery F. Koerner, P.E.  
New Source Review Section Administrator  
Bureau of Air Regulation

JFK/bm

This letter was sent to the following people by electronic mail with received receipt requested.

Mr. Michael J. Brost, JEA ([brosmj@jea.com](mailto:brosmj@jea.com))  
Mr. N. Bert Gianazza, JEA ([giannb@jea.com](mailto:giannb@jea.com))  
Mr. Kennard F. Kosky, P.E., Golder Associates, Inc. ([ken\\_kosky@golder.com](mailto:ken_kosky@golder.com))  
Mr. Richard Robinson, Duval County Environmental Quality Division ([robinson@coj.net](mailto:robinson@coj.net))  
Ms. Kathleen Forney, U.S. EPA, Region 4 ([forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov))  
Ms. Heather Abrams, U.S. EPA, Region 4 ([abrams.heather@epamail.epa.gov](mailto:abrams.heather@epamail.epa.gov))  
Ms. Ana Oquendo, U.S. EPA, Region 4 ([oquendo.ana@epa.gov](mailto:oquendo.ana@epa.gov))  
Ms. Catherine Collins, Fish and Wildlife Service ([catherine\\_collins@fws.gov](mailto:catherine_collins@fws.gov))  
Ms. Vickie Gibson, DEP BAR Reading File ([victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us))

## Livingston, Sylvia

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**From:** Livingston, Sylvia  
**Sent:** Wednesday, March 03, 2010 2:52 PM  
**To:** 'brosmj@jea.com'  
**Cc:** 'giannb@jea.com'; 'ken\_kosky@golder.com'; 'robinson@coj.net'; 'forney.kathleen@epamail.epa.gov'; 'abrams.heather@epamail.epa.gov'; 'oquendo.ana@epa.gov'; 'catherine\_collins@fws.gov'; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)  
**Subject:** Request for Additional Information: JEA - St. Johns River Power Park 0310045-029-AC/ PSD-FL-010I  
**Attachments:** RAI 0310045-029-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); 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". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

**Tracking:**

## Livingston, Sylvia

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**From:** Brost, Mike J. - VP, Electric Systems [BrosMJ@jea.com]  
**Sent:** Wednesday, March 03, 2010 3:00 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: Request for Additional Information: JEA - St. Johns River Power Park 0310045-029-AC/ PSD-FL-010I

Received. I can view the document.

Mike Brost

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Wednesday, March 03, 2010 2:52 PM  
**To:** Brost, Mike J. - VP, Electric Systems  
**Cc:** Gianazza, N. Bert; 'ken\_kosky@golder.com'; 'robinson@coj.net'; 'forney.kathleen@epamail.epa.gov'; 'abrams.heather@epamail.epa.gov'; 'oquendo.ana@epa.gov'; 'catherine\_collins@fws.gov'; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)  
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Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

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Florida has a very broad Public Records Law. Virtually all written communications to or from State and Local Officials and

## Livingston, Sylvia

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**From:** Gianazza, N. Bert [GianNB@jea.com]  
**Sent:** Wednesday, March 03, 2010 3:20 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: Request for Additional Information: JEA - St. Johns River Power Park 0310045-029-AC/ PSD-FL-010I

Sylvia,

We have received the document and can view the document.

Thanks, Bert

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Wednesday, March 03, 2010 2:52 PM  
**To:** Brost, Mike J. - VP, Electric Systems  
**Cc:** Gianazza, N. Bert; 'ken\_kosky@golder.com'; 'robinson@coj.net'; 'forney.kathleen@epamail.epa.gov'; 'abrams.heather@epamail.epa.gov'; 'oquendo.ana@epa.gov'; 'catherine\_collins@fws.gov'; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)  
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Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvia

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**From:** Robinson, Richard [ROBINSON@coj.net]  
**Sent:** Wednesday, March 03, 2010 3:04 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: Request for Additional Information: JEA - St. Johns River Power Park 0310045-029-AC/ PSD-FL-010I

Hi Sylvia,

I was able to access the subject document that was attached to the e-mail 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](mailto: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.

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**From:** Livingston, Sylvia [<mailto:Sylvia.Livingston@dep.state.fl.us>]  
**Sent:** Wednesday, March 03, 2010 2:52 PM  
**To:** 'brosmj@jea.com'  
**Cc:** 'giannb@jea.com'; 'ken\_kosky@golder.com'; Robinson, Richard; 'forney.kathleen@epamail.epa.gov'; 'abrams.heather@epamail.epa.gov'; 'oquendo.ana@epa.gov'; 'catherine\_collins@fws.gov'; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)  
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