

## Memorandum

# Florida Department of Environmental Protection

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TO: Trina Vielhauer, Chief, Bureau of Air Regulation

THROUGH: Syed Arif, New Source Review Section <sup>SA</sup>

FROM: Bruce Mitchell, New Source Review Section <sup>RAM</sup>

DATE: November 19, 2008

SUBJECT: Project No. 0310045-023-AC  
JEA - Northside Generating Station  
Circulating Fluidized Bed (CFB) Boilers Nos. 1 and 2  
Notification to Receive, Store and Reclaim Kaolinite Type Material and Coal Bottom Ash  
as Fuel Additives for Use in the CFB Boilers Nos. 1 and 2  
Generic Emissions Unit Exemption

On July 28, 2008, and subsequent dates, we received information to support JEA's contention that the usage of fuel additives in the existing JEA Northside Generating Station's CFB Boilers Nos. 1 and 2 (boilers) will assist in the reliable operation of the boilers by preventing agglomeration of the bed material while firing 100 percent petroleum coke, which would require the boilers to be shutdown for maintenance. The information and supplementary information was submitted to support the JEA's contention that the receiving, storage, reclamation and usage of the fuel additive material would qualify for a generic emissions unit exemption pursuant to Rule 62-210.300(3)(b)1., Florida Administrative Code. Based on information received and reviewed during the evaluation process, JEA's position appears to be valid and should be recognized in the Title V Air Operation Permit as an insignificant activity and as a fuel additive under the Methods of Operation in the emissions units' subsection. We recommend your approval of the attached Receipt of Notification of Generic Emissions Unit Exemption letter.

Attachments



# 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

November 20, 2008

*Sent by Electronic Mail – Received Receipt Requested*

Mr. James M. Chansler, P.E., D.P.A., Chief Operating Officer  
JEA  
Northside Generating Station  
21 West Church Street  
Jacksonville, Florida 32202

Re: Notification to Receive, Store and Reclaim Kaolinite Type Material and Coal Bottom Ash as Fuel Additives for Use in the Circulating Fluidized Bed Boilers Nos. 1 and 2  
Project No. 0310045-023-AC  
Generic Emissions Unit Exemption

Dear Mr. Chansler:

On July 28, 2008, and subsequent dates, information was submitted that a proposed fuel additive operation related to the existing circulating fluidized bed (CFB) Boilers Nos. 1 and 2 would qualify for a generic emissions unit exemption pursuant to Rule 62-210.300(3)(b)1., Florida Administrative Code. The purpose is to assist in the reliable operation of the boilers by preventing agglomeration of the bed material while firing 100 percent petroleum coke, which would require the boilers to be shutdown for maintenance. The activity included the receiving, storage, reclamation and use of the material. Thank you for the submittal and supplementary information to support your contention.

  
Trina Vielhauer, Chief  
Bureau of Air Regulation

TLV/sa/bm

**RECEIPT OF NOTIFICATION OF GENERIC EMISSIONS UNIT EXEMPTION**

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**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Receipt of Notification of Generic Emissions Unit Exemption was sent by electronic mail (or a link to this document made available electronically on a publicly accessible server) with received receipt requested before the close of business on 11/20/08 to the persons listed below.

Mr. James M. Chansler, P.E., D.P.A., Chief Operating Officer, JEA ([chanJM@jea.com](mailto:chanJM@jea.com))

Mr. N. Bert Gianazza, P.E., JEA ([gianNB@jea.com](mailto:gianNB@jea.com))

Mr. Richard Robinson, ERMD-EQD ([ROBINSON@coj.net](mailto:ROBINSON@coj.net))

Ms. Vickie Gibson, DEP BAR ([Victoria.Gibson@dep.stste.fl.us](mailto:Victoria.Gibson@dep.stste.fl.us)) (for read file)

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)

11/20/08  
(Date)

## Livingston, Sylvia

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**From:** Livingston, Sylvia  
**Sent:** Thursday, November 20, 2008 4:19 PM  
**To:** 'chanJM@jea.com'; 'gianNB@jea.com'  
**Cc:** 'robinson@coj.net'; Gibson, Victoria; Mitchell, Bruce; Arif, Syed; Walker, Elizabeth (AIR)  
**Subject:** JEA - Northside Generating Station - Notification of Generic Emissions Unit Exemption Submittal

**Attachments:** 0310045-023-AC Notification.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.



0310045-023-AC  
Notification.pd...

Thank you,

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>> .

| Tracking: | Recipient               | Read                     |
|-----------|-------------------------|--------------------------|
|           | 'chanJM@jea.com'        |                          |
|           | 'gianNB@jea.com'        |                          |
|           | 'robinson@coj.net'      |                          |
|           | Gibson, Victoria        |                          |
|           | Mitchell, Bruce         |                          |
|           | Arif, Syed              | Read: 11/21/2008 9:57 AM |
|           | Walker, Elizabeth (AIR) |                          |

**Livingston, Sylvia**

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**From:** Gianazza, N. Bert [GianNB@jea.com]  
**Sent:** Friday, November 21, 2008 9:05 AM  
**To:** Livingston, Sylvia  
**Subject:** RE: JEA - Northside Generating Station - Notification of Generic Emissions Unit Exemption Submittal

My R.O. and I have received this.

Tx, Bert

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Thursday, November 20, 2008 4:19 PM  
**To:** Chansler, James M. - Chief Operating Officer; Gianazza, N. Bert  
**Cc:** robinson@coj.net; Gibson, Victoria; Mitchell, Bruce; Arif, Syed; Walker, Elizabeth (AIR)  
**Subject:** JEA - Northside Generating Station - Notification of Generic Emissions Unit Exemption Submittal

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<<0310045-023-AC Notification.pdf>>

Thank you,

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

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Florida has a very broad Public Records Law. Virtually all

11/21/2008

**Livingston, Sylvia**

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**From:** Robinson, Richard [ROBINSON@coj.net]  
**Sent:** Thursday, November 20, 2008 4:26 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: JEA - Northside Generating Station - Notification of Generic Emissions Unit Exemption Submittal

Sylvia,

I was able to view the attached document.

Thanks,

Richard

Richard L. Robinson, P.E.  
Environmental Engineering Manager  
Air Quality Branch  
Environmental Quality Division  
Environmental and Compliance Department  
City of Jacksonville, Florida  
117 West Duval Street, Suite 225  
Jacksonville, FL 32202

Phone: (904) 630-4900  
Fax: (904) 630-3638  
E-Mail: robinson@coj.net

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]  
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**Cc:** Robinson, Richard; Gibson, Victoria; Mitchell, Bruce; Arif, Syed; Walker, Elizabeth (AIR)  
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<<0310045-023-AC Notification.pdf>>

Thank you,

11/20/2008

## Livingston, Sylvia

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**From:** Chansler, James M. - Chief Operating Officer [ChanJM@jea.com]  
**To:** Livingston, Sylvia  
**Sent:** Friday, November 21, 2008 10:16 AM  
**Subject:** Read: JEA - Northside Generating Station - Notification of Generic Emissions Unit Exemption Submittal

Your message

To: [ChanJM@jea.com](mailto:ChanJM@jea.com)  
Subject:

was read on 11/21/2008 10:16 AM.