

21 West Church Street
Jacksonville, Florida 32202-3139

August 24, 2005

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BUREAU OF AIR REGULATION



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SEWER

Mr. Jeffrey F. Koerner, P.E.
Program Administrator
Permitting North
Bureau of Air Regulation
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Northside Generating Station/St. Johns River Power Park
Project No. 0310045-016-AV

Dear Mr. Koerner:

This purpose of this letter is to request a revision to the conditions related to Northside Units 1 and 2 circulating fluidized bed (CFB) boilers in the above referenced permit.

The requested changes to the CEM language in the permit are summarized in the attachment to this letter.

If you have any questions, please call Bert Gianazza at (904) 665-6247.

Sincerely,

A handwritten signature in black ink that reads "James M. Chansler".

James M. Chansler, P.E., D.P.A.

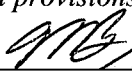
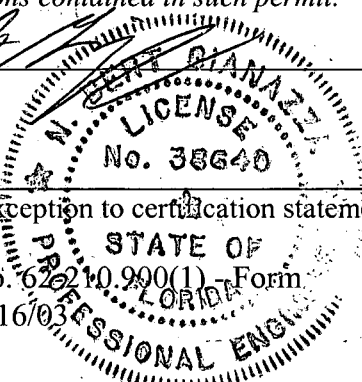
Responsible Official

Vice President, Operations and Maintenance

cc: Bruce Mitchell, FDEP
Mike Halpin, P.E., FDEP
Steve Pace, P.E., RESD

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: N. Bert Gianazza Registration Number: 38640
2. Professional Engineer Mailing Address... Organization/Firm: JEA Street Address: 21 W. Church Street City: Jacksonville State: FL Zip Code: 32202
3. Professional Engineer Telephone Numbers... Telephone: (904) 665 - 6247 ext. Fax: (904) 665 - 7376
4. Professional Engineer Email Address: giannb@jea.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature  Date <u>2/24/05</u> (seal) 

* Attach any exception to certification statement.

Permit 0310045-011-AV Condition H.28

From:

H.28. Sulfur Dioxide.

a. Compliance with sulfur dioxide (SO₂) emissions limits in Specific Condition **H.10.a.** shall be demonstrated with Continuous Emissions Monitoring Systems (CEMS's) installed, certified, operated and maintained in accordance with 40 CFR Part 75, based on 24-hour block and 30-day rolling averages, as applicable, and excluding periods of startup, shutdown, and malfunction. When monitoring data are not available, substitution for missing data shall be handled as required by the federal Acid Rain Program. Emissions recorded in parts per million shall be converted to lb/MMBtu using an appropriate F-factor for purposes of determining compliance with the emission limits in Specific Condition **H.10.a.**

To:

H.28. Sulfur Dioxide.

a. Compliance with sulfur dioxide (SO₂) emissions limits in Specific Condition **H.10.a.** shall be demonstrated with Continuous Emissions Monitoring Systems (CEMS's) installed, certified, operated and maintained in accordance with 40 CFR Part 75, based on 24-hour block and 30-day rolling averages, as applicable, and excluding periods of startup, shutdown, and malfunction. Emissions recorded in parts per million shall be converted to lb/MMBtu using an appropriate F-factor for purposes of determining compliance with the emission limits in Specific Condition **H.10.a.**

Justification:

The statement regarding the use of missing data substitution should be removed because it conflicts with Condition H.32 that states that the averages should be based "valid hourly emission rates." While missing data substitution is required under Part 75 for allowance calculation purposes, including the isolated reference in the permit where the focus is compliance with separate, non-allowance related emission limits is potentially confusing.

It would be incongruous to include Part 75 missing data substitution in the averages used to determine compliance with the permit limits. Only valid data can be used for determining compliance with an emissions standard. If data are invalid or missing, a compliance determination simply cannot be made. To suggest that substitute data should be used to calculate averages for compliance purposes is potentially tantamount to implying a violation without credible evidence. The Part 75 missing data substitution provisions represent a conservative scheme to fill in periods when data are unavailable specifically for allowance tracking purposes. The values represent "made up" numbers that inherently have no place in determining compliance with permit limits and should not be included in any block compliance average.

Permit 0310045-011-AV Condition H.29

From:

H.29. Oxides of Nitrogen.

a. Compliance with the oxides of nitrogen (NOx) emissions limit in Specific Condition **H.11.a.** shall be demonstrated with a CEMS's installed, certified, operated and maintained in accordance with 40 CFR Part 75, based on a 30-day rolling average and excluding periods of startup, shutdown and malfunction. When monitoring data are not available, substitution for missing data shall be handled as required by the federal Acid Rain Program to calculate the 30-day rolling average.

To:

H.29. Oxides of Nitrogen.

a. Compliance with the oxides of nitrogen (NOx) emissions limit in Specific Condition **H.11.a.** shall be demonstrated with a CEMS's installed, certified, operated and maintained in accordance with 40 CFR Part 75, based on a 30-day rolling average and excluding periods of startup, shutdown and malfunction. The 30-day rolling averages will be determined based on hourly values calculated in accordance with Appendix F of 40 CFR Part 75.

Justification:

The statement regarding the use of missing data substitution should be removed because it conflicts with Condition H.32 that states that the averages should be based "valid hourly emission rates." Missing data substitution should not be used for determining compliance average. See justification for Condition H.28.

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