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August 10, 2010

Jon Holtom, P.E., Title V Section Administrator
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

AUG 12 2010
BUREAU OF
AIR REGULATION

RE: **NGS/SJRPP/ST FACILITY
DRAFT PERMIT NO. 0310045-027-AC AND 0310045-028-AV
COMMENTS ON DRAFT PERMIT**

Dear Mr. Holtom:

Jacksonville Electric Authority (JEA) has received the Florida Department of Environmental Protection's (FDEP's) Draft Air Construction Permit No. 0310045-027-AC and draft Title V Operating Permit No. 0310045-028-AV dated April 26, 2010. On behalf of JEA, Golder Associates Inc. is submitting the following comments regarding the Draft Air construction Permit and Draft Title V Operating Permit.

Draft Permit No. 0310045-027-AC

SECTION 1. GENERAL INFORMATION

Facility Description

Page 3 of 9 – JEA is modifying its original request to burn landfill gas (LFG) in NGS Units 1 and 2. In the original request, a new line was to be installed to deliver LFG to a lance above the existing above-bed burners in Units 1 and 2. JEA would like to retain that option for the future, but at present, JEA desires to burn LFG using the burners already existing since the LFG can be valved directly into the natural gas as it enters the plant. Under this option, no physical changes would be needed in order to burn the LFG in Units 1 and 2; the valving already exists.

Per conversation between JEA and the Department, JEA requests that the air construction (AC) permit be issued for a period of 5 years to allow for the option in the future of installing a new LFG line and lances in the boilers.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. NGS: Circulating Fluidized Bed Boiler Nos. 1 and 2

Page 8 of 9, Condition 8, Initial and Annual Monitoring- H₂S Content: This condition requires initial and annual confirmation of the H₂S content of the LFG. JEA requests that this requirement be changed to "initially and once every 5 years thereafter upon permit renewal". Since the SO₂ emissions from the NGS Units 1 and 2 are controlled by limestone injection into the fluidized bed boiler and by the spray dryer absorber (SDA) system, and the amount of LFG that will be burned is small, the H₂S content of the LFG is not an issue in meeting SO₂ emission limits. Suggested revised wording of this condition is as follows:

The permittee shall perform an initial confirmation of the H₂S content of the landfill gas relied upon in the permit application. Analysis of the H₂S content of the landfill gas fired shall be performed initially and once every 5 years upon permit renewal. The initial analysis of the H₂S



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content shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initially burning landfill gas in either Units 1 or 2.

Page 9 of 9, Condition 11, Test Methods: Per conversation between JEA and the Department, it is requested that that any reference to the GEM 2000 analyzer be removed. Reference should be made to: "An appropriate analytical method, mutually agreed upon by JEA and the Department, shall be used to determine H₂S content".

Page 9 of 9, Condition 15, H₂S Report: It is requested to delete the requirement to notify the Department if the H₂S concentration exceeds 482 ppmvd. As discussed above, since the SO₂ emissions from the NGS Units 1 and 2 are controlled by limestone injection into the fluidized bed boiler and by the SDA system, and the amount of LFG that will be burned is small, the H₂S content of the LFG is not an issue. NGS will continue to meet all SO₂ emission limits when LFG is being burned in the boilers.

Draft Permit No. 0310045-028-AV

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

G. Emissions Unit -026 & -027

Page 56, Condition 25, Test Methods: In the narrative below the table, it is requested that any reference to the GEM 2000 analyzer be removed. Reference should be made to: "An appropriate analytical method, mutually agreed upon by JEA and the Department, shall be used to determine H₂S content".

Page 58, Condition G.31.2, Annual Monitoring- H₂S Content: This condition requires annual monitoring of the H₂S content of the LFG. JEA requests that this requirement be changed to "initially and once every 5 years thereafter upon permit renewal". Since the SO₂ emissions from the NGS Units 1 and 2 are controlled by limestone injection into the fluidized bed boiler and by the SDA system, and the amount of LFG that will be burned is small, the H₂S content of the LFG is not an issue. Suggested revised wording of this condition is as follows:

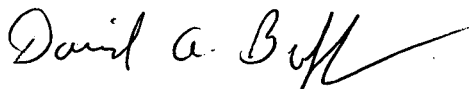
Analysis of the H₂S content of the landfill gas fired shall be performed initially and once every five years upon permit renewal.

Page 61, Condition G.45.5, H₂S Report: It is requested to delete the requirement to notify the Department if the H₂S concentration exceeds 482 ppmvd. As discussed above, since the SO₂ emissions from the NGS Units 1 and 2 are controlled by limestone injection into the fluidized bed boiler and by the SDA system, and the amount of LFG that will be burned is small, the H₂S content of the LFG is not an issue in meeting the SO₂ emission limits. NGS will continue to meet all SO₂ emission limits when LFG is being burned in the boilers.

Thank you for consideration of this comment. If you have any questions, please do not hesitate to call me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.
Principal Engineer

cc: Bert Gianazza, JEA

DB/tlc