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 JEA
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Mr. James M. Chansler
 V.P. Operations and Maintenance
 JEA
 St. Johns River Power Park
 21 West Church Street
 Jacksonville, Florida 32202

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Dept. of Environmental Protection
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Tallahassee, FL 32399-2400

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OCT 27 2005

AIR REGULATION



Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

October 20, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James M. Chansler
V. P. Operations and Maintenance
JEA
St. Johns River Power Park
21 West Church Street
Jacksonville, Florida 32202

Re: DEP File No. 0310045-014-AC, PSD-FL-010
St. Johns River Power Park

Dear Mr. Chansler:

The Department is in receipt of your letter dated September 29, 2005. It is our understanding that SJRPP asserts that the historical Annual Operating Reports (AOR's) for carbon monoxide emissions of coal-fired units 1 and 2 are incorrect. Additionally, SJRPP has provided EPA Method 10 test data for years 1997 through 2001 supporting the above assertion, and has further asked the Department to revise the table in Section 7 of the Technical Evaluation and Final Determination for DEP File No. 0310045-014-AC to reflect the newer information.

As the Authorized Representative, you are required to certify that to the best of your knowledge the information provided within the AOR is correct. In the event that there are errors or omissions within past submittals, it is incumbent upon you to make those corrections, and to re-certify their accuracy. Regarding the (above) requested change to DEP File No. 0310045-014-AC, the referenced table was based upon AOR submittals. If SJRPP elects to revise past AOR's, the Department will make changes as appropriate based upon the more accurate AOR data. Accordingly, this office requests that it be copied on such submittals.

You are encouraged to use due diligence in ensuring that:

- 1) Historical emissions are accurate, and that submittals to this Department are appropriately reflective of actual operation and conditions, and
- 2) Emissions which increase or decrease as a result of the authorization within DEP File No. 0310045-014-AC are accounted for.

If you have any further questions, please contact M. P. Halpin, P.E. at 850/921-9519.

Sincerely,

Trina Vielhauer, Chief,
Bureau of Air Regulation

TV/mph

Enclosures

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TRINA / STPL

1/3



It appears that STPL is ~~saying~~ ^{saying} that they reported their AOR's incorrectly (for) the basis of which was relevant to the recent permit mod I issued increasing the % pet coke from 20% - 30%.

The AOR's were submitted using AP-42 emission factors ~~for~~ for CO of ".021 lb / mscf" whereas test data supports a factor of ".123 lb / mscf".

I issued the permit based upon the AOR's which showed a 24r avg of 966.1 tpy (2001-2002), and gave them 999 tpy on top of that for a future "welco"-type limit of 1066 tpy. However, based upon the test data, the past actual was 5916 tpy suggesting that the "welco" limit should have been ≈ 6010 tpy.

This would normally appear very suspicious, however here are some things to consider:

2/3



- 1) The units have ~~no~~ limits for CO, nor do they have limits other than as they relate to ~~and~~ these limits which I've imposed
- 2) The permit does not require them to report C.O. emissions by any specific method.
- 3) There's no reason that I can see that SJRPP could not continue to report C.O. emissions using AP 42 and comply with the 1966 rule requirement. They are simply pointing out that they believe the test data is better.
- 4) It appears that SJRPP is offering to correct their past AOP's as they relate to C.O., based upon this better info.

3/3



My recommendations are:

- 1) Respond to SRELL that we will allow the AOR to be corrected based upon their submission, and
- 2) Once the above has been certified as correct (i.e. V.P. Chandler signs it) we will correct the related permit docs.

Mike

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OCT 10 2005

BUREAU OF AIR REGULATION



September 29, 2005

Ms. Trina L. Vielhauer, Chief Bureau of Air Regulation
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

Attention: Mr. Mike Halpin, P.E., New Review Section

RE: Northside Generating Station/St. Johns River Power Park (SJRPP)
Title V Permit 0310045-014-AC; PSD-FL-10

Dear Mr. Halpin:

SJRPP recently received the authorizations referenced above to co-fire up to 30 percent petroleum coke with coal. The basis of that authorization included information supplied by SJRPP on annual emissions based on the annual operating reports (AORs) submitted to the Department for the entire Northside Generating Station/St. Johns River Power Park. For carbon monoxide, the AORs were prepared based on using the EPA AP-42 emission factors. The final Technical Evaluation and Preliminary Determination of the authorizations were reviewed against the historical data on record at SJRPP. This review indicated that the CO emissions provided in the AORs may not be representative of previous operation when co-firing petroleum coke with coal. Tests for CO were conducted using EPA Method 10 on both units for 5-years from 1997 through 2001 to fulfill the Department's requirement that CO emissions had not increased as a result of co-firing up to 20 percent petroleum coke with coal. The results of these tests are summarized in the attached Table CO-1. The average CO emissions during this 5-year period were 0.123 lb/MMBtu.

The actual average CO emission rate is much different than the AP-42 emission factor of 0.5 lb/ton or about 0.021 lb/MMBtu based on 12,000 Btu/lb coal. These AORs had been prepared for SJRPP as part of the Northside Generating Station/St. Johns River Power Park using historical methods. The CO test was not included in the AOR calculations. The SJRPP has been required to meet NOx emission limits since its initial operation and required by the Acid Rain Program. The NOx controls, low-NOx burners and over-fire air, influence combustion and therefore CO test data would be more appropriate than EPA AP-42 emission factors.

The annual emissions for CO for 1999 through 2003 were recalculated based on an average CO emission rate of 0.123 lb/MMBtu. The results of the annual emissions and the 2001-2002 average CO emissions are presented in Table 2-3 (Rev. 1). This table is similar to the information previously provided to the Department in the request to co-fire 30 percent petroleum coke with coal.

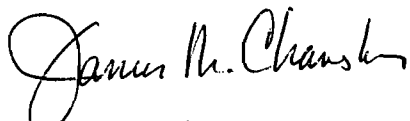
Based on the updated information on CO emissions, SJRPP requests that the table contained in the Technical Evaluation and Preliminary Determination be revised as indicated below:

Pollutant	2001 Actual Emissions (TPY)	2002 Actual Emissions (TPY)	2001-2002 Average (TPY)	PSD Significant Emission Rates (TPY)	Maximum average Emission Rate without a PSD review (TPY)
NO _x	26379.1	26738.5	26558.8	40	26598.7
CO	5883.7	5936.8	5910.2	100	6010.2
VOC	118.873	118.179	118.53	40	158.5
SO ₂	22535.41	20902.199	21718.8	40	21758.7
SAM	1311.0	1322.9	1316.9	7	1323.8
PM	317.258	326.2401	321.75	25	346.7
PM ₁₀	72.964	75.596	74.28	15	89.2
Pb	1.21	0.81	1.01	0.6	1.59

Note: Years 2001 and 2002 were proposed by the applicant as a "representative" period for comparison to future emissions.

No changes are required in the permit conditions issued by the Department. The requested change would only affect the basis for comparing future actual emissions of CO with the historical emissions for 2001-2002. The SJRPP appreciates the Department's consideration in this matter. Please call Mr. Jay Worley or our environmental consultant Mr. Ken Kosky, P.E. (352-336-5600) if there are any questions.

Sincerely,



James M. Chansler, P.E.
V.P. Operations and Maintenance

Enclosures

cc: Hamilton Oven, P.E., Siting Coordination Office

Table CO-1. Summary of CO Test Data Using EPA Method 10 for SJRPP

Fuel	Date	Unit	CO (lb/mmBtu)	
Coal/Pet Coke	6/4/1997	1	0.067	
	6/5/1997	2	0.114	
	11/3/1997	1	0.035	
	11/4/1997	2	0.093	
	5/19/1998	1	0.278	
	5/20/1998	2	0.095	
	10/12/1998	1	0.013	
	10/13/1998	2	0.032	
	6/2/1999	1	0.048	
	6/3/1999	2	0.01	
	10/15-18/99	1	0.266	
	10/16/1999	2	0.09	
	6/1/2000	1	0.043	
	6/2/2000	2	0.027	
	10/18/2000	1	0.068	
	12/18/2000	2	0.291	
	12/13/2001	1	0.183	
	12/12/2001	2	0.458	
		Average Unit 1:		0.111
		Average Unit 2:		0.134
	Average Both Units:		0.123	

Table 2-3 (rev 1). SJRPP Annual Average Emissions for each Consecutive Two Year Period, 1999-2003

Pollutant	2003-2002	2002-2001	2001-2000	2000-1999	2003-1999
NOx	25,860.3	26,558.8	25,712.6	25,350.0	25,759.9
CO	954.9	966.1	961.3	945.1	954.0
Revised CO ^a	5,879.3	5,910.2	5,857.7	5,784.4	5,842.2
SO2	21,007.7	21,718.8	22,056.7	23,032.5	22,123.2
VOC	117.1	113.5	112.5	95.5	106.8
PM	235.8	321.7	313.1	295.5	275.9
PM10	109.6	74.3	72.0	68.0	85.6
SAM	1,310.1	1,316.9	1,440.0	1,423.7	1,355.7

^a based on the the following emission calculations:

Year	Heat Input (MMBtu/hr)		Unit 1	CO Emissions ^b		Average
	Unit 1	Unit 2		Unit 2		
2003	46,416,440	48,376,056	2,850.7	2,971.1	5,821.8	
2002	51,497,802	45,166,544	3,162.8	2,774.0	5,936.8	
2001	46,245,091	49,554,215	2,840.2	3,043.5	5,883.7	
2000	49,067,877	45,885,639	3,013.6	2,818.1	5,831.7	
1999	44,524,193	48,888,602	2,734.5	3,002.6	5,737.1	

^b based on 0.123 lb/MMBtu from EPA Method 10 tests (see Table CO-1).

March 15, 2006

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MAR 23 2006

Mr. Wayne Tutt, QEP
Environmental Program Supervisor
Air & Water Quality Division
Regulatory Environmental Services Department (RES D)
117 West Duval Street, Suite 225
Jacksonville, FL 32202

BUREAU OF AIR REGULATION



RE: St. Johns River Power Park (SJRPP) / JEA
FDEP File No. 1310045-014-AC and PA 81-13
Certification of Annual Emissions

Dear Mr. Tutt:

Please find attached a letter and certification from Ken Kosky, P.E. of Golder Associates to Mr. Jay Worley, SJRPP Superintendent, regarding the above certification of annual emissions. This certification letter addresses the requirements of Specific Condition 3 of the above referenced Florida Department of Environmental Protection (FDEP) authorizations. As stated in the letter from Mr. Kosky:

"These authorizations allow SJRPP to co-fire up to 30-percent petroleum coke by weight with coal provided the annual emissions do not exceed maximum average emission rates without requiring a Prevention of Significant Deterioration (PSD) review that was specified by the FDEP. As required by Specific Condition 3, data must be submitted on an annual basis for a period of 5 years from the date each unit begins firing petroleum coke with coal, demonstrating accordance with 40 CFR 52.21(b)(21)(v) and (b)(33) that operational changes did not result in emissions increases of nitrogen oxides (NOx), carbon monoxide (CO), sulfuric acid mist (SAM), volatile organic compounds (VOCs), and particulate matter (PM)".

Please refer to Mr. Kosky's attached certification letter which concludes that SJRPP Unit 1 and 2 met the annual requirements for 2005 specified in FDEP File No. 030045-014-AC and PA 81-13.

Please contact Jay Worley at (904) 665-8729 if you have any questions regarding this certification.

Sincerely,

A handwritten signature in cursive script that reads "Paul M. Smith".

Paul M. Smith
Alternate Responsible Official
Plant Manager, St. Johns River Power Park

for SJRPP
huc

Enclosures

cc: Hamilton Oven, P.E., FDEP Siting Coordination Office
✓ Mike Halpin, FDEP, Bureau of Air Regulation, New Source Review
Jay Worley, SJRPP
Ken Kosky, Golder & Associates

✓ Mike

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



February 22, 2006

043-7580-0100

Mr. Jay A. Worley, Group Leader Bulk Materials
St. Johns River Power Park
11201 New Berlin Road
Jacksonville, FL 32226

RE: St. Johns River Power Park
FDEP File No. 0310045-014-AC and PA 81-13
Certification of Annual Emissions

Dear Jay:

Golder Associates is providing this certification to address the requirements of Specific Condition 3 of the above-referenced Florida Department of Environmental Protection (FDEP) authorizations. These authorizations allow St. Johns River Power Park (SJRPP) to co-fire up to 30-percent petroleum coke by weight with coal provided the annual emissions do not exceed maximum average emission rates without requiring a Prevention of Significant Deterioration (PSD) review that was specified by the FDEP. As required by Specific Condition 3, data must be submitted on an annual basis for a period of 5 years from the date each unit begins firing petroleum coke with coal, demonstrating accordance with 40 CFR 52.21(b)(21)(v) and (b)(33) that operational changes did not result in emissions increases of nitrogen oxides (NO_x), carbon monoxide (CO), sulfuric acid mist (SAM), volatile organic compounds (VOCs), and particulate matter (PM). In the final determination, the FDEP provided the basis for comparing annual emissions as well as compliance methods.

This certification covers the period of April 16, 2005, through December 31, 2005. April 16, 2005, was the first time Units 1 and 2 were co-fired with petroleum coke above 20-percent by weight. Information for the period April 16, 2005, through December 31, 2005, was annualized to provide a comparison for determining compliance. The annual period of January 1, 2005, through December 31, 2005, is presented for comparison. The heat input used to calculate emissions and the emission rates are presented in the attached Table 2005-Compliance. Baseline emissions included in the FDEP authorization are included in the table and used for determining emission increases. Future compliance certifications will be made on a calendar year basis. The certification for each pollutant is presented below.

Nitrogen Oxides and Sulfur Dioxide: The compliance method for determining if the operational change increased emissions of NO_x and sulfur dioxide (SO₂) is the use of continuous emission monitoring systems (CEMSs). The annualized emissions of NO_x and SO₂ from CEMs for 2005 did not exceed the maximum average emission rate without requiring a PSD review that was specified by FDEP.

Particulate Matter: The compliance method for determining if the operational change increased emissions of PM is through the use of stack tests. The annualized emissions of particulate matter using stack test data for 2005 did not exceed the maximum average emission rate without requiring a PSD review that was specified by FDEP.

Sulfuric Acid Mist: The compliance method for determining if the operational change increased emissions of SAM is the use of stack tests. While the test method was not specified, SJRPP performed tests in August 2005 and November 2005 using EPA Method 8 and the controlled condensate method. The controlled condensate was developed by the pulp and paper industry and was a previous EPA test method (Method 8A). This method is intended to condense SAM and sulfur trioxide (SO₃) without the potential of artifacts created by SO₂ in Method 8. This method is currently used at some facilities in Florida as the compliance method. Method 8A was investigated since previous stack tests conducted using EPA Method 8 showed considerable variability that could not be accounted for in any of the testing parameters (SO₂ concentration, oxygen concentration, heat input, etc.). A summary of the test data from Methods 8 and 8A are presented in Table Method 8 and 8A. In general, the SAM emissions data developed using EPA Method 8 was more variable than Method 8A and higher than Method 8A by a factor of two. For the purpose of this certification, the average emission rate using Method 8 was used in the calculations presented in Table 2005-Compliance. The annualized emissions of SAM using EPA Method 8 test data for 2005 did not exceed the maximum average emission rate without requiring a PSD review that was specified by FDEP. SJRPP will continue to investigate SAM emissions in the future using both Methods 8 and 8A.

Volatile Organic Compounds: The compliance method for determining if the operational change increased emissions of VOCs is the use of the historical methods used in providing information for the Annual Operating Reports (AORs). Historically, SJRPP calculated VOC emissions based on the EPA AP-42 emission factors. Using the AP-42 emission factor for VOCs, the annualized emissions of VOCs for 2005 did not exceed the maximum average emission rate without requiring a PSD review that was specified by FDEP.

Carbon Monoxide: The compliance method for determining if the operational change increased emissions of carbon monoxide is the use of stack tests. However, the tons provided in the FDEP determination were based on AP-42 emission factors. In addition, previous stack tests demonstrated considerably the variability of CO emissions when tests with 20-percent petroleum coke by weight were conducted. Therefore, a more accurate method for determining CO concentrations is needed. SJRPP has had CEMs measuring CO since the mid-1990s. This equipment has been used as an operational indicator for the units and was not required for compliance or reporting emissions. The Relative Accuracy Test Audits (RATAs) for the CO CEMs were conducted in 2001, 2003, 2004, and 2005. With the exception of the 2003 RATA for Unit 1, all RATAs passed the requirements. As a result, valid data were generally obtained over the last 5 years that would be more accurate in establishing baseline emissions than historical stack test data. Moreover, CO test data using EPA Method 10 were not obtained after 2001. Under a separate request, SJRPP is requesting that the FDEP allow the use of CEMs for determining historical emissions for CO. The annualized emissions of compliance, based on the use of CEMs for the historical data and 2005 data, did not exceed the maximum average emission rate without requiring a PSD review that was specified by FDEP.

In conclusion, SJRPP Units 1 and 2 met the annual requirements for 2005 specified in FDEP File No. 030045-014-AC and PA 81-13. Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.



Kennard F. Kosky, P.E.
Principal

Professional Engineer Certificate #14996
Golder Associates Certificate of Authorization #00001670

Enclosures

KFk/nav

L022206-PEcert_Final.doc



Table 2005-Compliance. Period and Annual Emissions Estimates for Co-firing 30-percent Petroleum Coke with Coal for SJRPP Units 1 and 2

	Units	April 16 - Dec, 2005 ^a			Annualized Emissions ^b	January 1 - December 31, 2005			Baseline Actual Emissions
		Unit 1	Unit 2	Total		Unit 1	Unit 2	Total	
Heat Input	MMBtu	33,109,500	32,149,041			40,576,121	44,879,935		
NOx	lb/MMBtu tons	0.384 6,357.02	0.388 6,236.91	12,593.94	17,679.95	0.402 8,155.80	0.384 8,616.95	16,772.75	26,598.7
CO	lb/MMBtu tons	0.181 2,996.41	0.155 2,491.55	5,487.96	7,704.25	0.173 3,509.83	0.159 3,567.95	7,077.79	13,776.5
VOC ^c	lb/MMBtu tons	0.003 49.66	0.003 48.22	97.89	137.42	0.003 60.86	0.003 67.32	128.18	158.5
SO ₂	lb/MMBtu tons	0.41 6,787.45	0.439 7,056.71	13,844.16	19,435.07	0.415 8,419.55	0.438 9,828.71	18,248.25	21,758.7
SAM	lb/MMBtu tons	0.010 162.24	0.016 262.01	424.25	595.58	0.010 198.82	0.016 365.77	564.59	1,323.8
PM	lb/MMBtu tons	0.0017 28.14	0.0032 51.44	79.58	111.72	0.0017 34.49	0.0032 71.81	106.30	346.7

^a Co-firing of Petroleum Coke above 20% by weight was initiated on April 16, 2005.

^b Annualized emissions based on the ratio of 365 divided by the number of days since April 16, 2005 (i.e., 260 days).

^c AP-42 emissions factor for VOC is 0.06 lb/ton (Table 1.1-19) or 0.003 lb/MMBtu based on 12,000 Btu/lb of coal.

Table Method 8A and 8. Summary of Method 8A (Controlled Condensate) and Method 8 Tests for SJRPP

Date and Time	Unit	Run	Percent (%) Petroleum Coke	Method 8A (lb/MMBtu)	Method 8 (lb/MMBtu)
8/23/2005	1	1	30%	0.0043	0.0033
8/23/2005	1	2	30%	0.0046	0.0036
8/24/2005	1	1	20%	0.0065	0.0028
8/24/2005	1	2	20%	0.0074	0.0185
8/24/2005	2	1	30%	0.0065	0.02
8/24/2005	2	2	30%	0.0037	0.0188
8/24/2005	2	1	20%	0.0059	0.0208
8/24/2005	2	2	20%	0.0043	0.0109
11/8/2005	1	1	30%	0.0081	0.0155
11/8/2005	1	2	30%	0.0077	0.0127
11/8/2005	1	3	30%	0.0071	0.0122
11/7/2005	2	1	30%	0.0116	0.0127
11/7/2005	2	2	30%	0.0082	0.0162
11/7/2005	2	3	30%	0.0067	0.0149
Averages:					
20-percent Petroleum Coke				0.0060	0.0133
30-percent Petroleum Coke				0.0068	0.0130
Unit 1 ^a				0.0065	0.0098
Unit 2 ^b				0.0067	0.0163
All Data				0.0066	0.0131

^a Method 8 results of 0.0098 lb/MMBtu was used for the comparison with baseline actual emissions.

^b Method 8 results of 0.0163 lb/MMBtu was used for the comparison with baseline actual emissions.

Table CO-CEMS. Historical CO Emissions Using Continuous Emissions Monitors

Year	Unit	Heat Input (MMBtu)	CO CEMs (lb/MMBtu)	CEMs Total Tons Per Unit	CEMs Total Tons Per Plant
2000	1	49,485,420	0.327	8,090.9	15,590.8
	2	45,454,152	0.330	7,499.9	
2001	1	47,963,552	0.239	5,731.6	14,463.5
	2	48,645,432	0.359	8,731.9	
2002	1	50,932,641	0.262	6,672.2	12,891.6
	2	44,905,573	0.277	6,219.4	
2003	1	44,949,751	0.251	5,641.2	11,927.6
	2	48,171,325	0.261	6,286.4	
2004	1	50,640,690	0.188	4,760.2	9,716.2
	2	38,718,787	0.256	4,956.0	
2001 and 2002 used as baseline emissions					13,677.5



Jeb Bush
Governor

f/Tring

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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JUL 11 2005

DIVISION OF AIR
RESOURCE MANAGEMENT

Colleen M. Castille
Secretary

July 08, 2005

- CERTIFIED MAIL - RETURN RECEIPT REQUESTED -

Mr. James M. Chansler
St. Johns River Power Park
11201 New Berlin Road
Jacksonville, Florida 32226

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JUL 15 2005

BUREAU OF AIR REGULATION

**RE: St Johns River Power Park
Modification to Conditions of Certification
DEP Case Number PA 81-13L
OGC Case Number 05-1677**

INTENT TO MODIFY CONDITIONS OF CERTIFICATION

Dear Mr. Chansler:

The Department gives notice to Jacksonville Electric Authority of its intent to modify the conditions of certification for **St. Johns River Power Park** (PA 81-13) to incorporate a final Title V Permit revision into the Conditions of Certification. Pursuant to Section 403.516, Florida Statutes ("F.S."), and Rule 62-17.211, Florida Administrative Code ("F.A.C."), all parties to the certification proceeding have 45 days from the issuance of this corrected notice by mail to such party's last address of record in which file a written objection to the modification.

A public notice will be published on the Department's internet home page at <http://www.dep.state.fl.us/> under the link or button titled "Official Notices" regarding this Intent to Modify the Conditions of Certification. Any person who is not already a party to the certification proceeding and whose substantial interests will be affected by the requested modification has 30 days from the date of publication of the public notice on the FAW to object in writing. Failure to act within the time frame constitutes a waiver of the right to become a party.

Written objections must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000. If the Department does not receive any written objections, then an Order Modifying the Conditions of Certification shall be issued by the Department. If written objections are timely filed which

St. Johns River Power Park
Order Modifying Conditions of Certification
DEP Case Number PA81-13L
7/8/2005

CC by certified mail:

James Antista, Esquire
Fish and Wildlife Conservation Commission
6230 South Meridian Street
Tallahassee, FL 32399-1600

Craig Varn, Esquire
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100

Mary Ann Helton, Esquire
Florida Public Service Commission
Gerald Gunter Building
2450 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Sheauching Yu, Esquire
Department of Transportation
Haydon Burns Building
605 Suwannee Street
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Jim Maher, PE
DEP Northeast District Office
Industrial Wastewater Supervisor
7825 Baymeadows Way, Suite B-200\
Jacksonville, FL 32256

~~Michael Cooke~~
✓ Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Kathryn L. Manella, Esq
General Counsel
St. Johns River Water Management District
POB 1429
Palatka, FL 32178-1429

Gregory K. Radlinski, Esq
Office of General Counsel
City of Jacksonville
Room 1300- City Hall
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Jacksonville, FL 32202

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3000 Independent Square
Jacksonville, FL 32202

Gary P. Sams, Esq
Hopping Green Sams & Smith, P.A.
POB 6526
Tallahassee, FL 32314

And by hand delivery to:

Scott A. Goorland, Esquire
Department of Environmental Protection
3900 Commonwealth Blvd.
Mail Station 35
Tallahassee, FL 32399-3000

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XX/XX/05

- CERTIFIED MAIL - RETURN RECEIPT REQUESTED -

Mr. James M. Chansler
St. Johns River Power Park
11201 New Berlin Road
Jacksonville, Florida 32226

**RE: St Johns River Power Park
Modification to Conditions of Certification
DEP Case Number PA 81-13L
OGC Case Number 05-1677**

FINAL ORDER MODIFYING CONDITIONS OF CERTIFICATION

Dear Mr. Chansler:

On January 1, 2004, the Department of Environmental Protection (DEP) issued a final Title -V permit revision (0310045-011-AV) for **St. John River Power Park (SJRPP)**. Review of the Conditions of Certification for SJRPP indicated that a modification would be necessary.

On or before July 10, 2005 all parties to the certification proceeding were provided with notice by certified mail of the Department's intent to modify the Conditions of Certification for this facility, along with a copy of the proposed Order Modifying Conditions of Certification. Additionally, on July 10, 2005, notice of the Department's intent to modify the Conditions of Certification for this facility was published on the Department's internet home page at <http://www.dep.state.fl.us/> under the link or button titled "Official Notices." Those notices specified that pursuant to Section 403.516, Florida Statutes ("F.S."), and Rule 62-17.211, Florida Administrative Code ("F.A.C."), all parties to the certification proceeding have 45 days from the issuance of notice by mail to such party's last address of record in which to file a written objection to the modification; that any person who is not already a party to the certification proceeding and whose substantial interests will be affected by the requested modification has 30 days from the date of publication of the public notice on the Department's internet home page to

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object in writing; that failure to act within the time frame constitutes a waiver of the right to become a party; and that the Department will issue an Order Modifying the Conditions of Certification for this facility if no written objections are received by the Department.

No objections to the modification have been received by the Department. The Conditions of Certification for Deerhaven are hereby modified as follows:

All reference to 'permittee' is changed to 'licensee'

I. Air

The construction and operation of SJRPP Units 1 & 2 at the JEA Jacksonville steam electric power plant site shall be in accordance with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-296, 62-297, 62-701 and 62-702, Florida Administrative Code, ~~and PSD Permit PSD-FL-010, as amended, and Title V Air Operation Permit No 0310045-011-AV a and any modification or amendment to such Title V permit.~~ In addition to the foregoing, the ~~permittee~~ licensee shall comply with the following conditions of certification:

A. Emission Limitations

1. No Change
2. When Unit 1 or Unit 2 are burning a mixture of coal and petroleum coke, the following limitations shall apply:
 - a. When blends of petroleum coke and coal with a sulfur content of up to or equal to 2 percent by weight are fired in Units 1 & 2, the SO₂ emissions shall not exceed ~~0.55~~ 0.53 pound per million British Thermal Units (lb/MMBtu) and a minimum of ~~76~~ 79 percent reduction shall be achieved in the flue gas desulfurization system.
 - b. When co-firing petroleum coke with coals having a sulfur content between 2.00 and 3.63 percent by weight, the emission limitation shall be based on the following formula: SO₂ emission limit (lb/MMBtu)=(0.2 x C/100)+0.4, where C=percent of coal fired on a heat input basis.
 - c. When coals with a sulfur content greater than 3.63 percent by weight are co-fired with petroleum coke, the SO₂ emission limitation shall be established by the following formula: SO₂(lb/MMBtu)=(0.1653 x C x S - 0.4 x C+40) x 1/100, where C=percent of coal co-fired on a heat input basis and S=weight percent sulfur in the coal.
 - d. The maximum SO₂ emission rate when firing petroleum coke and coal shall not exceed 0.676 lb/MMBtu heat input.
 - e. Compliance with the SO₂ emission limit shall be based on a 30-day rolling average for those days when petroleum coke is fired. Any use of petroleum coke during a 24-hour period shall be considered one day of the 30-day rolling average. The 30-day rolling average shall be calculated according to the New Source Performance Standards (NSPS) codified in 40 CFR 60 Subpart Da, except as noted above.

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f. The petroleum coke blends shall be limited to a maximum of ~~20~~ 30 percent petroleum coke by weight. The maximum weight of petroleum coke burned shall not exceed ~~400,000~~ 150,000 lb/hr based on a 30-day rolling average using production information for the amount of coal and petcoke metered from the coal storage bins to the boilers. The maximum sulfur content of the petroleum coke-coal blend shall not exceed 4.00 percent by weight.

g. The ~~permittee~~ licensee shall maintain and submit to the Department on an annual basis for a period of five years from the date the unit is initially co-fired with petroleum coke above 20% by weight, information demonstrating in accordance with 40 CFR 52.21(b)(21)(v) and 40 CFR 52.21(b)(33) that operation changes did not result in emissions increases of nitrogen oxides, carbon monoxide, sulfur dioxide, sulfuric acid mist, volatile organic compounds and particulate matter.

~~h. The permittee licensee shall maintain and submit to the Department on a semiannual basis for a period of two years from the date the unit is initially co-fired with petroleum coke, and then on an annual basis (if the first two years of data show no significant increase in carbon monoxide emissions) for an additional three years, information demonstrating that the operational changes did not result in a significant emission increase of carbon monoxide. The carbon monoxide emissions shall be based on test results using EPA Method 10. Additionally, quarterly continuous emission monitoring data for carbon monoxide emissions shall be submitted to the Department for a period of two years to show the range of emissions experienced during each quarter.~~

~~i. The permittee licensee shall maintain and submit to the Department on a semiannual basis, for a period of two years from the date a unit is initially co-fired with petroleum coke, information demonstrating that the operational changes did not result in significant increases of sulfuric acid mist. The sulfuric acid mist emissions shall be based on test results using EPA Method 8.~~

3. – 15. No Change

B. – E. No Change

XXIII. Definitions

The meaning of terms used herein shall be governed by the definitions contained in Chapter 403, Florida Statutes, and any regulation adopted pursuant thereto. In the event of any dispute over the meaning of a term used in these general or special conditions which is not defined in such statutes or regulations, such dispute shall be resolved by reference to the most relevant definitions contained in any other state or federal statute or regulation or, in the alternative, by the use of the commonly accepted meaning as determined by the Department. The term "Licensee" shall mean JEA.

Any party to this Order has a right to seek judicial review of it pursuant to Section 120.68, Florida Statutes by filing a Notice of Appeal, pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, M.S. 35, Tallahassee, Florida 32399-3000, and by filing a copy of the Notice of Appeal, accompanied by the applicable filing fees, with the

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appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty days from the date this Order is filed with the Clerk of the Department of Environmental Protection.

Executed in Tallahassee, Florida.

Hamilton S. Oven, P.E.
Administrator, Siting Coordination Office

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52
Florida Statutes, with the designated
Department Clerk, receipt of which is
hereby acknowledged.

Clerk Date

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St. John River Power Park
Modification to Conditions of Certification
DEP Case Number PA 81-13L
OGC Case Number 05-1677
July XX, 2005

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CC by certified mail:

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