



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

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*Electronic Mail – Received Receipt Requested*

[brosmj@jea.com](mailto:brosmj@jea.com)

Michael J. Brost, V.P. Electric Systems  
JEA  
21 West Church Street, T-16  
Jacksonville, Florida 32202

Re: **Request for Additional Information**  
Project No. 0310045-040-AC  
JEA Northside Generating Station  
Byproduct Reintroduction Project

Dear Mr. Brost:

On August 25, 2014, we received your application for an air construction permit to temporarily reintroduce bottom ash and fly ash byproduct into Boilers 1 and 2 at Northside Generating Station, with the goal of using available lime in the byproduct to assist with control of sulfur dioxide emissions. The facility is located in Duval County at 4377 Heckscher Drive in Jacksonville, Florida. The application indicates that the project is subject to general preconstruction review pursuant to rule 62-212.300 of the Florida Administrative Code (F.A.C.). The application is incomplete. In order to continue processing your application, please provide the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. **Rate of Byproduct Reintroduction:** The application does not indicate how much byproduct JEA intends to reintroduce into Boilers 1 and 2, or the hourly or daily rate at which it intends to reintroduce the byproduct. Please identify the maximum rate (in pounds per hour) that byproduct will be reintroduced into the boilers as well as the maximum cumulative amount of byproduct (tons) that will be reintroduced over the course of the six-month reintroduction project. Also, please indicate the number of days over the course of the six month test period that JEA intends to reintroduce byproduct.
2. **Byproduct Reintroduction Process:** There is no information in the application on the physical process of byproduct reinjection. Please provide information on the method and point of byproduct injection into the boilers and the method of transport of byproduct from on-site storage to the boilers. Also, please describe any new temporary equipment, such as ducts, pipes, fans, conveyors, dust collectors, etc., that will be necessary. If a process flow diagram is necessary to describe this adequately, please provide one.
3. **Byproduct Metals Content:** In determining the effect of byproduct reintroduction on emissions, it is necessary to understand the content of important metals in the byproduct to be reintroduced. Please provide information on the content of the following metals in the ash byproduct to be reintroduced: mercury, antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, nickel, and selenium.
4. **Prevention of Mercury Breakthrough or Runaway Mercury Buildup:** The repeated reintroduction of the same unit of byproduct could potentially lead to an accumulation of mercury in the system. Please provide information on assuring that a unit of byproduct that is reintroduced to the boilers is not subsequently reintroduced again to the boilers. This may be as simple as providing a method for assuring that bottom ash and fly ash collected after reintroduction has commenced is segregated from the byproduct that has not yet been reintroduced.

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

## REQUEST FOR ADDITIONAL INFORMATION

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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 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, John Dawson, at 850/717-9085 or email, [john.dawson@dep.state.fl.us](mailto:john.dawson@dep.state.fl.us).

Sincerely,

David Read, Environmental Administrator  
Office of Permitting and Compliance  
Division of Air Resource Management

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

Mr. Michael Brost, V.P. Electric Systems, JEA: [brosmj@jea.com](mailto:brosmj@jea.com)

Mr. Jay Worley, JEA: [worlja@jea.com](mailto:worlja@jea.com)

Mr. Daniel Nay Hlaing, P.E., JEA: [hlaidn@jea.com](mailto:hlaidn@jea.com)

Ms. Alisa Coe, Earthjustice: [acoe@earthjustice.org](mailto:acoe@earthjustice.org)

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DLR/jpd