

Florida Department of
Environmental Protection

Memorandum

TO: Michael G. Cooke

THRU: Trina Vielhauer *TV*
J. F. Koerner *JFK*

FROM: Michael P. Halpin *MH*

DATE: October 13, 2005

SUBJECT: JEA - Brandy Branch Generating Station
PSD Permit Modification – Low Load Operation Units 2 and 3
DEP File No. 0310485-015-AC, PA 00-43, PSD-FL-310 **E**

Attached is the final permit modification relative to JEA's Brandy Branch PSD permit.

The permit modification allows for Units 2 and 3 to operate on natural gas down to loads of 65 gross megawatts (approximately 35% output). This is an existing facility and neither a PSD Review nor a new determination of Best Available Control Technology (BACT) was required as a result of this request.

In support of the request, JEA has provided test results for its simple cycle Unit 1 (an identical, co-located combustion turbine), under tests which were authorized by the Department during October of 2004; which indicate that CO levels can be consistently maintained under 11 ppmvd @ 15% O₂ while operating at 65 megawatts. Currently, the permit limits CO emissions to 15 ppmvd @ 15% O₂ while firing natural gas and minimizes operation below 50% output (approximately 90 megawatts) as a result of expected increases in CO while operating at loads below 50%.

A review supports the applicant's contention that the existing permit condition limiting the low load to 50% may be relaxed while ensuring that all other permit conditions (emission limits) will be met.

Notice was published in the Florida Times-Union on September 25, 2005. No comments were received.

I recommend your approval.

Attachments

/mph