

21 West Church Street
Jacksonville, Florida 32202-3139

RECEIVED

NOV 05 2004

November 4, 2004

BUREAU OF AIR REGULATION



ELECTRIC

WATER

SEWER

Mr. Bruce Mitchell, P.E.
Environmental Administrator
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Brandy Branch Generating Station, Permit No. 0310485-005-AV
Kennedy Generating Station, Permit No. 0310047-011-AV
Requests for Permit Revisions to Remove Liquid Fuel Nitrogen
Testing Requirement

Dear Mr. Mitchell:

Per our conversation, please hold our request for permit revision dated September 22, 2004 and October 7, 2004 for Brandy Branch Generating Station in abeyance until we apply for a Title V revision to incorporate the combined cycle conversion of Units 2 and 3.

Also, enclosed please find the additional permit application pages you requested to process our permit revision request dated September 21, 2004 and October 7, 2004 pertaining to the Kennedy Generating Station.

An exception to the Responsible Official Certification is attached in the form of recent JEA correspondences as well.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Bert Gianazza', written over a white background.

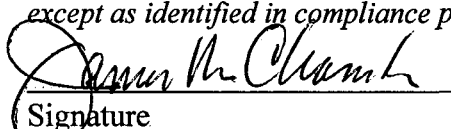
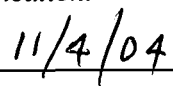
N. Bert Gianazza, P.E.
Environmental Services

Enclosures

APPLICATION INFORMATION

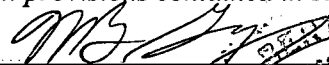
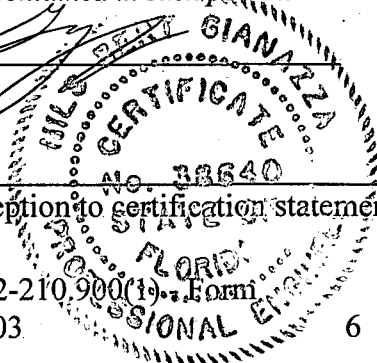
Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Mr. James M. Chansler, P.E., D.P.A., Vice President, Operations and Maintenance
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: JEA Street Address: 21 West Church Street City: Jacksonville State: FL Zip Code: 32202
4. Application Responsible Official Telephone Numbers... Telephone: (904) 665-4433 ext. Fax: (904) 665-7990
5. Application Responsible Official Email Address:
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature  Date

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, Tower 8 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 checked="" 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 checked="" 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>10/28/04</u> (seal) 

* Attach any exception to certification statement.



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: JEA	
2. Site Name: Kennedy Generating Station	
3. Facility Identification Number: 0310047	
4. Facility Location... 421 ⁵ Talleyrand Ave. Street Address or Other Locator: City: Jacksonville County: Duval Zip Code:	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Bert Gianazza	
2. Application Contact Mailing Address... Organization/Firm: JEA Street Address: 21 W. Church St. City: Jacksonville State: FL Zip Code: 32202	
3. Application Contact Telephone Numbers... Telephone: () - 904-665-6247 ext. Fax: () - 904-665-7376	
4. Application Contact Email Address: giannb@jea.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Project Number(s):	0310047-013-AC / 0310047-014-AV
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

21 West Church Street
Jacksonville, Florida 32202-3139



October 8, 2004

VIA FACSIMILE 202-343-2357

Mr. Manuel Oliva

6204J

USEPA Headquarters

Ariel Rios Building

1200 Pennsylvania Avenue, N.W.

Washington, D.C. 20460

E L E C T R I C

W A T E R

S E W E R

Re: Brandy Branch Generating Station – Combustion Turbines 1, 2, and 3
Title V Air Operation Permit No. 0310485-005-AV
(DEP E.U. I.D. No. 001, 002, and 003; EPA ID No. 001, 002, 003
(ORIS code 7846))

Kennedy Generating Station – Combustion Turbine No. 7
Title V Air Operation Permit No. 0310047-012-AV
(DEP E.U. I.D. No. 015; EPA ID No. 7 (ORIS code 0666))

Northside Generating Station – Boiler No. 3
Title V Air Operation Permit No. 0310045-011-AV
(DEP E.U. I.D. No. 003; EPA ID No. 3 (ORIS code 0667))

Dear Mr. Oliva:

This letter is to notify the U.S. Environmental Protection Agency (EPA) of potential deviations from monitoring-related requirements for the five above-referenced units located at three of JEA's facilities. Specifically, JEA suspects deviations from some of the specific and detailed requirements of 40 CFR Part 75 regarding the calibration, operation, and maintenance of continuous emissions monitors on these five units, as required under the Title V and Acid Rain permits and the federal acid rain program.

After receiving a critical error report from the EPA in response to a recently submitted quarterly emissions data report (EDR) for a Brandy Branch unit, JEA initiated a review and hired RMB Consulting, Inc., to assist in that review to identify and define any potential problems with the continuous emissions monitoring system, and eventually to

Letter to Oliva
October 8, 2004
Page 2 of 2

develop suggested resolutions to any such problems. I believe that Mr. Russell Berry with RMB contacted you regarding this initial effort.

Preliminary results of that review have identified potential deviations with certain requirements under 40 CFR Part 75 for all five of the units referenced above, and suggest that a more in-depth and detailed analysis of the situation is warranted. While this analysis will take some time to complete because of the enormous quantity of data to be reviewed and the number of units involved, we hope to have preliminary findings within the next three to four weeks. Concurrently, we are beginning to take immediate action to upgrade the continuous emissions monitoring programs at these three facilities.

In addition to addressing any specific points of deviation, however, we are also analyzing our entire continuous emissions monitoring program and approach to data quality. We are attempting to upgrade our program as quickly and as aggressively as possible, such as through increased personnel and improved procedures, training, equipment, and software. As a result of the review and analysis being performed by RMB, as an independent third party, and as a result of input from you and your staff, we intend to have an unexceptionable program as soon as is practicably possible.

In the meantime, we will be contacting you to schedule a meeting so we can provide a more detailed briefing regarding the initial findings of the review and our intended strategy at this point. If you have any questions in the meantime, please do not hesitate to call me.

Sincerely,



Susan Hughes
JEA Vice President of Environmental Services
Alternative Responsible Official and
Alternative Designated Representative

21 West Church Street
Jacksonville, Florida 32202-3139



October 8, 2004

VIA FACSIMILE 904-448-4319

E L E C T R I C

Mr. Chris Kirts
Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256

W A T E R

VIA FACSIMILE 904-630-3488

S E W E R

Ms. Janice Eggleton Davis, Director
Environmental Resource Management Department
117 West Duval Street, Suite 225
Jacksonville, FL 32202

Re: Brandy Branch Generating Station – Combustion Turbines 1, 2, and 3
Title V Air Operation Permit No. 0310485-005-AV
(DEP E.U. I.D. No. 001, 002, and 003; EPA ID No. 001, 002, 003
(ORIS code 7846))

Kennedy Generating Station – Combustion Turbine No. 7
Title V Air Operation Permit No. 0310047-012-AV
(DEP E.U. I.D. No. 015; EPA ID No. 7 (ORIS code 0666))

Northside Generating Station – Boiler No. 3
Title V Air Operation Permit No. 0310045-011-AV
(DEP E.U. I.D. No. 003; EPA ID No. 3 (ORIS code 0667))

Dear Ms. Davis and Mr. Kirts:

This letter is to notify the City of Jacksonville's Environmental Quality Division and the Florida Department of Environmental Protection of potential deviations from monitoring-related requirements for the five above-referenced units located at three of JEA's facilities. Specifically, JEA suspects deviations from some of the specific and detailed requirements of 40 CFR Part 75 regarding the calibration, operation, and

Letter to Kirts and Davis
October 8, 2004
Page 2 of 2

maintenance of continuous emissions monitors on these five units, as required under the Title V and Acid Rain permits and the federal acid rain program.

After receiving a critical error report from the EPA in response to a recently submitted quarterly emissions data report (EDR) for a Brandy Branch unit, JEA initiated a review and hired RMB Consulting, Inc., to assist in that review to identify and define any potential problems with the continuous emissions monitoring system, and to develop suggested resolutions to any such problems. The preliminary results of that review have identified potential deviations with certain requirements under 40 CFR Part 75 for all five of the units referenced above, and suggest that a more in-depth and detailed analysis of the situation is warranted.

While this analysis will take some time to complete because of the enormous quantity of data to be reviewed and the number of units involved, we hope to have preliminary findings within the next three to four weeks and we are beginning to take immediate action to upgrade the continuous emissions monitoring programs at these three facilities. As you may appreciate, each quarterly report includes approximately 20,000 lines of data per unit, and we are analyzing each quarterly report for the last four years for each of the five units. While part of the analysis is performed electronically, much data must still be reviewed by individuals on a manual basis, and this is, of course, quite time consuming.

In addition to addressing any specific points of deviation, however, we are also analyzing our entire continuous emissions monitoring program and approach to data quality. We are attempting to upgrade our program as quickly and as aggressively as possible, such as through increased personnel and improved procedures, training, equipment, and software. As a result of the review and analysis being performed by RMB, as an independent third party, and as a result of input from you and your staff, we intend to have an unexceptionable program as soon as practicably possible.

In the meantime, we will be contacting you to schedule a meeting so we can provide a more detailed briefing regarding the initial findings of the review and our intended strategy at this point. If you have any questions in the meantime, please do not hesitate to call me.

Sincerely,



James Chansler
JEA Vice President of O & M
Responsible Official and Designated Representative

Best Available Copy

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

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7001 0320 0001
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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To
Mr. N. Bert Gianazza, P.E.
JEA - Environmental Services
or PO Box No.
21 West Church Street
City, State, ZIP+4
Jacksonville, Florida 32202-3139

PS Form 3800, January 2001 See Reverse for Instructions

THIS SECTION ON DELIVERY

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:
Mr. N. Bert Gianazza, P.E.
JEA - Environmental Services
21 West Church Street
Jacksonville, Florida 32202-3139

A. Signature
J. Richardson Agent
 Addressee

B. Received by (Printed Name) *J. Richardson* C. Date of Delivery *9/27*

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2 Article Number
(Transfer from service label)

7001 0320 0001 3692 6679

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

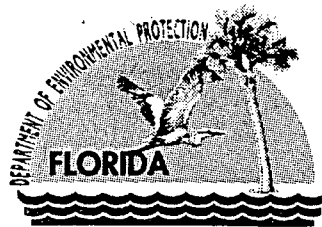
• Sender: Please print your name, address, and ZIP+4 in this box •

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd , MS 5505
Tallahassee, FL 32399-2400

RECEIVED

OCT 04 2004

BUREAU OF AIR REGULATION



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

September 23, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. N. Bert Gianazza, P.E.
JEA - Environmental Services
21 West Church Street
Jacksonville, Florida 32202-3139

Re: Authorization to Conduct Tests – low load operation
Brandy Branch Generating Station Unit 1
ARMS ID. 0310485

Dear Mr. Gianazza:

The Department has reviewed the request from JEA received on September 20, 2004 concerning low load testing on Brandy Branch Unit 1 located in Duval County, Florida.

You are hereby authorized to conduct testing on this emission unit while operating below 50% output. In order to accommodate the testing, the unit is authorized to operate below 50% output for more than 2 hours during each unit cycle, 24 hour period or calendar day. All conditions of existing permits shall remain in force during the testing other than the relaxation of this 2 hour limitation. This temporary authorization shall expire on November 30, 2004.

The performance tests shall be conducted in order to gather data regarding pollutant emissions at outputs below 50%. This testing is being conducted such that JEA can more precisely specify the percent output, above which compliance with permitted emission limitations can be continuously met. Unless otherwise specified, during this period, all data and test results for operation below 50% shall be sent to the Department's Bureau of Air Regulation within 30 days of the expiration of this temporary permit. Upon any request for a permanent permit revision for this emission unit, the Department will evaluate the establishment of new or additional permit conditions resulting from either increases or improvements in emission quality or quantity.

The performance tests shall be subject to the following conditions:

1. A minimum of three separate, non-consecutive days of testing while combusting each fuel (natural gas and low sulfur oil) shall be required in order to accommodate process variability.
2. NO_x CEMS shall be used to show compliance with the NO_x emission limit. The NO_x CEMS shall have been installed, certified, maintained and operated in accordance with existing permit conditions.
3. EPA Method 10 shall be used to show compliance with the existing CO emission limitations.
4. The permittee shall notify the Environmental Quality Division of the City of Jacksonville and the DEP Northeast District upon commencement of initial testing and 7 days prior to commencement of any stack performance testing.

"More Protection, Less Process"

Printed on recycled paper.

5. The Department's Northeast District, the Environmental Quality Division of the City of Jacksonville and the Bureau of Air Regulation shall be notified within 5 days, in writing, upon completion of the test program.
6. A written final report shall be submitted to the Bureau of Air Regulation within 45 days of completion of the last test.

This letter must be attached to and shall become a part of the existing permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Under Section 120.60(3), F.S., any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice. Petitions filed by any persons other than those entitled to written notice under section 120.60(3), F.S., must be filed within fourteen (14) days of receipt of this notice of intent. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

Mr. N. Bert Gianazza
JEA
Brandy Branch Generating Station Unit 1
Page 3 of 3

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty (30) days after this order is filed with the clerk of the Department.

Sincerely,



Trina L. Vielhauer, Chief
Bureau of Air Regulation
Division of Air Resource Management

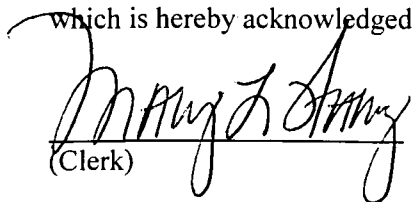
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Authorization to Conduct Performance Testing was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 9/23/04 to the person(s) listed:

N. Bert Gianazza, JEA*
Robert S. Pace, EQD
Chris Kirts, DEP NED
Buck Oven, DEP PPSO
Jim Little, EPA Region 4

Clerk Stamp

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)

9/23/04
(Date)

21 West Church Street
Jacksonville, Florida 32202-3139

RECEIVED

SEP 20 2004

September 17, 2004



Jim Pennington, P.E.
Administrator
Permitting North
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

ELECTRIC

RE: Brandy Branch Generating Station Units 1, 2, and 3
PSD Permits PSD-267 and PSD-310
Title V Permit 0310485-005-AV

WATER

SEWER

Dear Mr. Pennington:

Per my conversation of this date with Mr. Mike Halpin, we request approval to operate the above referenced units below 50% for the purpose of preparing for and conducting CO testing on gas and #2 diesel oil.

This testing will be performed to show compliance with the CO limit(s) at a lower load to support our forthcoming requests for permit revisions to replace the current low load limit of 50% with new low load limits of approximately 50 MW on each the three units as determined by stack testing.

NOx CEMs will be used to show compliance with the NOx limits on all three units, and CO CEMs will be used to show compliance with the CO limits on Units 2 and 3. The request for permit revision for Unit 1 (PSD-267) will be submitted separately and prior to the request for permit revision for Units 2 and 3 (PSD-310).

The appropriate stack testing notifications will be provided to the Environmental Quality Division of the City of Jacksonville prior to testing.

If you have any questions, please don't hesitate to call me at 665-6247.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Bert Gianazza'.

N. Bert Gianazza, P.E.
Environmental Services

cc: Robert S. Pace, P.E., EQD

MAIN FILE

21 West Church Street
Jacksonville, Florida 32202-3139

RECEIVED

OCT 12 2004

BUREAU OF AIR REGULATION

October 7, 2004



Jim Pennington, P.E.
Administrator
Permitting North
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

ELECTRIC

WATER

SEWER

RE: Brandy Branch Generating Station
Simple Cycle Combustion Turbines (Units 1, 2, 3)
Kennedy Generating Station
Simple Cycle Combustion Turbine (Unit 7)

Dear Mr. Pennington:

Per Bert Gianazza's correspondences dated September 21 and 22, please issue permit revisions to remove the nitrogen testing requirements for the above referenced units in accordance with the EPA final rule published in the Federal Register dated July 8, 2004 revising the standards of performance for stationary gas turbines (40 CFR 60, subpart GG).

If you have any questions, please don't hesitate to call me at 665-4433 or Bert Gianazza at 665-6247.

Sincerely,

A handwritten signature in cursive script that reads "James M. Chansler".

James M. Chansler, P.E., D.P.A.
Responsible Official
Vice President, Operations and Maintenance

cc: Bruce Mitchell, P.E., DEP

21 West Church Street
Jacksonville, Florida 32202-3139

September 22, 2004



Jim Pennington, P.E.
Administrator
Permitting North
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

ELECTRIC

WATER

RE: Brandy Branch Generating Station
Simple Cycle Combustion Turbines (Units 1, 2, 3)
Title V Permit 0310485-005-AV
Air Construction Permit PSD-FL-267

SEWER

Dear Mr. Pennington:

In accordance with the EPA final rule published in the Federal Register dated July 8, 2004 revising the standards of performance for stationary gas turbines (40 CFR 60, subpart GG), we request a revision to specific condition A.24 of the above referenced Title V permit and condition 44 of the above referenced PSD permit to remove the requirement for nitrogen testing of diesel fuel. NOx CEMs are used on these units to show compliance with the NOx limits, and the allowance for fuel bound nitrogen is not claimed.

If you have any questions, please don't hesitate to call me at 665-6247.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Bert Gianazza', written in a cursive style.

N. Bert Gianazza, P.E.
Environmental Services

cc: Robert S. Pace, P.E., EQD

21 West Church Street
Jacksonville, Florida 32202-3139

September 21, 2004



Jim Pennington, P.E.
Administrator
Permitting North
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

E L E C T R I C

W A T E R

S E W E R

RE: Kennedy Generating Station
Simple Cycle Combustion Turbine Unit 7
Title V Permit 0310047-01-AV

Dear Mr. Pennington:

In accordance with the EPA final rule published in the Federal Register dated July 8, 2004 revising the standards of performance for stationary gas turbines (40 CFR 60, subpart GG), we request a revision to specific condition D.30 of the above referenced permit to remove the requirement for nitrogen testing of diesel fuel. A NOx CEMs is used on this unit to show compliance with the NOx limits, and the allowance for fuel bound nitrogen is not claimed.

If you have any questions, please don't hesitate to call me at 665-6247.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Bert Gianazza', is written over a horizontal line.

N. Bert Gianazza, P.E.
Environmental Services

cc: Robert S. Pace, P.E., EQD