FLORIDA DEPARTMENT OF
Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

(Sent by Electronic Mail – Return Receipt Requested)

Ms. Melissa Jones
Director of Production Energy Supply
City of Gainesville, Gainesville Regional Utilities (GRU)
P.O. Box 147117, Station A132
Gainesville, Florida 32614-7117

Re: Title V Air Operation Permit Renewal
Proposed Permit No. 0010005-013-AV
J.R. Kelly Generating Station

Dear Ms. Jones:

One copy of the proposed permit determination for the renewal of the Title V air operation permit for the J.R. Kelly Generating Station located in Alachua County at 605 SE 3rd Street in Gainesville, Florida, is enclosed. This letter is only a courtesy to inform you that the draft permit has become a proposed permit.

An electronic version of this determination has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. Interested persons may view the proposed permit by visiting the following website: https://fldep.dep.state.fl.us/air/emission/apds/default.asp and entering the permit number shown above.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the proposed Title V air operation permit is made by the USEPA within 45 days, the proposed permit will become a final permit no later than 55 days after the date on which the proposed permit was mailed (posted) to USEPA. If USEPA has an objection to the proposed permit, the final permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact David Lyle Read, P.E., at 850/717-9075, or by email at David.REad@dep.state.fl.us.

Sincerely,

David Lyle Read, P.E.

David Lyle Read, P.E.
2018.08.24 11:03:56 -04'00'

For:
Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

SA/dlr

Copies sent by electronic mail to the following:

Ms. Melissa Jones, Director of Production Energy Supply, GRU: jonesmc@gru.com
Mr. Brian Mott, Acting Production Manager II Kelly Plant, GRU: mottbj@gru.com
Ms. Regina Embry, GRU: embryrg@gru.com
Mr. Thomas W. Davis, P.E., TD Air Quality Consulting, LLC: tomdair1@gmail.com
Mr. Stuart Bartlett, DEP NED: stuart.bartlett@dep.state.fl.us
U.S. EPA Region 4: R4Title VFL@epa.gov
Ms. Lynn Scearce, DEP OPC: lynn.scearce@dep.state.fl.us
Ms. Barbara Friday, DEP OPC: barbara.Friday@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Lynn Scearce 2018.08.24 13:06:26 -04'00'

Permit No. 0010005-013 -AV

I. Public Notice.

An Intent To Issue Air Permit issued to City of Gainesville, Gainesville Regional Utilities (GRU) for the J.R. Kelly Generating Station located in Alachua County at 605 SE 3rd Street in Gainesville, Florida, was clerked on July 13, 2018. The Public Notice Of Intent To Issue Air Permit was published in The Gainesville Sun on July 22, 2018. The draft Title V air operation permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice Of Intent To Issue Air Permit was received on July 26, 2018.

II. Public Comment(s).

No Comments were received from the public during the 30-day public comment period; however, comments were received from the Permittee. The comments were not considered significant enough to reissue the draft Title V air operation permit and require another Public Notice; therefore, the draft Title V air operation permit was changed. Most comments were very minor in nature and dealt with typos, scrivener errors, incorrect descriptive text, etc. These minor changes were made to the proposed permit. Several significant comments were received and these comments are summarized below along with the Department's response.

Email from GRU dated August 15, 2018.

1. **Comment**: Replace the draft Appendix I insignificant activities with the 16 activities shown in Attachment D of the TV renewal application.

   Response: The Department will replace Appendix I with the correct version.

2. **Comment**: Add DLN tuning events to **Specific Condition II.A.17**, Excess Emission Allowed.

   Response: The changed was not part of the original permit application nor was the change included in the draft permit that was publicly noticed. Consequently, the changed cannot be made as part of the present permitting action. However, the Department is willing to make the change the next time the Title V air operation permit is open for revision or renewal.

3. **Comment**: Change "one-hour" to "720-operating hour block average in **Specific Condition II.A.24**, NOx CEMS for Reporting Excess Emissions and Emissions Above the 720-Operating Hour Block Average or the Annual Emissions Cap.

   Response: As before, the changed was not part of the original permit application nor was the change included in the draft permit that was publicly noticed. Consequently, the changed cannot be made as part of the present permitting action. However, the Department is willing to make the change the next time the Title V air operation permit is open for revision or renewal.

4. **Comment**: Change, as specified in Specific Conditions A.17 and A.24 occur" to "exceed the emission limits specified in Condition A.11, or if visible emissions exceed the emission limit specified in Condition A.16 in **Specific Condition III.A.42**, Excess Emissions Report.

   Response: As before, the changed was not part of the original permit application nor was the change included in the draft permit that was publicly noticed. Consequently, the changed cannot be made as part of the present permitting action. However, the Department is willing to make the correction the next time the Title V air operation permit is open for revision or renewal.

III. Conclusion.

The enclosed proposed Title V air operation permit includes the aforementioned changes to the draft Title V air operation permit. The permitting authority will issue the proposed permit No. 0010005-013-AV, with the changes noted above.