



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

April 26, 2006

Mr. James M. Chansler, P.E., D.P.A.
V.P., Operations and Maintenance and Responsible Official
JEA
21 West Church Street
Jacksonville, Florida 32202

Re: PROPOSED Title V Permit Revision No.: 0310045-016-AV
JEA
St. Johns River Power Park/Northside Generating Station/Separation Technologies, Inc.

Dear Mr. Chansler:

One copy of the "PROPOSED Determination" for the JEA's St. Johns River Power Park/Northside Generating Station/Separation Technologies, Inc. located at 4377 Heckscher Drive, Jacksonville, Duval County, 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 provided to the United States Environmental Protection Agency (USEPA) Region 4 office for their review. The web site address is:

"http://www.dep.state.fl.us/air/permitting/airpermits/AirSearch_ltd.asp"

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED 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 the 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Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.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 Bruce Mitchell at 850/413-9198.

Sincerely,

Trina L. Vielhauer
Chief
Bureau of Air Regulation

TLV/sms/bm

Enclosures

Copy furnished to:
Mr. Bert Gianazza, P.E., JEA, Application Contact (E-mail)
Mr. Hamilton Oven, P.E., DEP-SCO (E-mail)
Mr. Richard Robinson, P.E., ERMD-EQD (E-mail)
U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

"More Protection, Less Process"

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PROPOSED Determination

JEA

St. Johns River Power Park/Northside Generating Station/Separation Technologies, Inc.

Title V Air Operation Permit Revision No.: 0310045-016-AV

I. Public Notice.

An "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION" to the JEA's St. Johns River Power Park/Northside Generating Station located at 4377 Heckscher Drive, Jacksonville, Duval County, was clerked on March 2, 2006. The "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION" was published in The Florida Times-Union on March 16, 2006. The DRAFT Title V Air Operation Permit Revision was available for public inspection at the City of Jacksonville's Environmental Resource Management Department - Environmental Quality Division in Jacksonville and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION" was received on March 31, 2006.

II. Public Comment(s).

A comment was received during the 30 (thirty) day public comment period, which concluded on April 15, 2006. A comment was received in a letter dated April 11th, from Mr. Ebinezer Gujjarlapudi, Chief of the City of Jacksonville's Environmental Resource Management Department (ERMD), via an e-mail received on April 13th from Mr. Richard Robinson, Environmental Engineering Manager, ERMD-Environmental Quality Division/Air Quality Branch. Responses to the comment were received from Mr. N. Bert Gianazza, P.E. of Record, JEA, via e-mails received on April 24th and 25th. Based on the comment and subsequent responses, an amendment to Specific Condition H.21. will be made. The change is considered to be significant and would require another Public Notice if it is to be considered as "federally enforceable"; however, and based upon the responses received from Mr. Gianazza on April 24th and 25th, the request from Mr. Gujjarlapudi is acceptable to and was requested by JEA for inclusion in the Title V permit. Therefore, an amendment to Specific Condition H.21. will be made as follows and will include a flag of "Not Federally Enforceable":

FROM:

H.21. Authorized Emissions. Notwithstanding other emission limits and standards established by this permit, excess emissions resulting from startup, shutdown, or malfunction shall be permitted provided (1) that best operational practices are adhered to and (2) the duration of excess emissions shall be minimized but not exceed sixty (60) hours in any calendar month per emissions unit (CFBs Units Nos. 1 and 2). The permittee shall keep operational records necessary to demonstrate compliance with this restriction. Emissions data collected during periods of startup, shutdown, and malfunction shall be included when determining compliance with annual emission limits. The CFB Units shall not be started up at the same time. The permittee shall update the written procedure summarizing the current best operational practices to be followed every 5 years (at operating permit renewal).

Pursuant to Rule 62-210.200, F.A.C., Definitions, the following are defined:

- a. Startup: The commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.
- b. Shutdown: The cessation of the operation of an emissions unit for any purpose.
- c. Malfunction: Any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner.

{Permitting Note: See Specific Conditions H.49. and H.51. for reporting of excess emissions.}

[Rules 62-210.200, 62-210.700(1) & (5), F.A.C.; and, 0310045-015-AC/PSD-FL-265C]

PROPOSED Determination (cont.)

JEA

St. Johns River Power Park/Northside Generating Station/Separation Technologies, Inc.

Title V Air Operation Permit Revision No.: 0310045-016-AV

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TO:

H.21. Authorized Emissions.

(1) Notwithstanding other emission limits and standards established by this permit, excess emissions resulting from startup, shutdown, or malfunction shall be permitted provided (1) that best operational practices are adhered to and (2) the duration of excess emissions shall be minimized but not exceed sixty (60) hours in any calendar month per emissions unit (CFBs Units Nos. 1 and 2). The permittee shall keep operational records necessary to demonstrate compliance with this restriction. Emissions data collected during periods of startup, shutdown, and malfunction shall be included when determining compliance with annual emission limits. The CFB Units shall not be started up at the same time. The permittee shall update the written procedure summarizing the current best operational practices to be followed every 5 years (at operating permit renewal).

Pursuant to Rule 62-210.200, F.A.C., Definitions, the following are defined:

- a. **Startup:** The commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.
- b. **Shutdown:** The cessation of the operation of an emissions unit for any purpose.
- c. **Malfunction:** Any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner.

{Permitting Note: See Specific Conditions **H.49.** and **H.51.** for reporting of excess emissions.}

[Rules 62-210.200, 62-210.700(1) & (5), F.A.C.; and, 0310045-015-AC/PSD-FL-265C]

(2) **Not Federally Enforceable.** Notwithstanding other emission limits and standards established by this permit, excess emissions resulting from startup, shutdown, or malfunction shall be permitted provided (1) that best operational practices are adhered to and (2) the duration of excess emissions shall be minimized but not exceed sixty (60) hours during any 30 consecutive calendar days per emissions unit (CFBs Units Nos. 1 and 2). The permittee shall keep operational records necessary to demonstrate compliance with this restriction. Emissions data collected during periods of startup, shutdown, and malfunction shall be included when determining compliance with annual emission limits. The CFB Units shall not be started up at the same time. The permittee shall update the written procedure summarizing the current best operational practices to be followed every 5 years (at operating permit renewal).

Pursuant to Rule 62-210.200, F.A.C., Definitions, the following are defined:

- a. **Startup:** The commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.
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{Permitting Note: See Specific Conditions **H.49.** and **H.51.** for reporting of excess emissions.}

[Rules 62-210.200, 62-210.700(1) & (5), F.A.C.; 0310045-015-AC/PSD-FL-265C; and, applicant requested]

III. Conclusion.

A comment was received during the 30 (thirty) day public comment period. The change made does not require another Public Notice. The permitting authority hereby issues the PROPOSED Permit, with any changes noted above.