STATEMENT OF BASIS

JEA
Brandy Branch Generating Station
Facility ID No.: 0310485
Duval County

Title V Air Operation Permit Revision
DRAFT Permit No.: 0310485-016-AV

This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213 and 62-214. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of the permit.

This facility consists of three dual-fuel, nominal 170 megawatt (MW) General Electric model PG7241FA combustion turbine-electrical generators and two one-million gallon capacity fuel oil storage tanks. Two of the combustion turbines (EU-002 and EU-003) are configured for combined cycle mode and one (EU-001) for simple cycle operation. Emissions from the units are controlled by Dry Low NO_X (DLN-2.6) combustors when operating on natural gas, and wet injection when firing fuel oil. For the combined cycle units, SCR's are additionally utilized for further NO_X reductions. Inherently clean fuels and good combustion practices are employed to control all pollutants. The facility is located approximately 1 mile N.E. of Baldwin City, Duval County. UTM coordinates are: Zone 17; 408.81 km E; 3354.38 km N. Latitude: 30 degrees, 19 minutes, 14 seconds; Longitude 81 degrees, 56 minutes, 55 seconds.

Compliance Assurance Monitoring (CAM) *does not apply* to these emissions units.

Also, included in this permit are miscellaneous insignificant emissions units and/or activities.

Based on the Title V permit application received June 20, 2006, this facility is *not* a major source of hazardous air pollutants (HAPs). The facility holds ORIS code **7846** under the Federal Acid Rain Program.

Project Description

The subject of this permit is for the revision of the Title V Air Operation Permit to incorporate the terms and conditions of air construction permit (AC), No. 0310485-017-AC/PSD-FL-310(F). Specifically, the AC authorized an increase in the heat input rate to the heat recovery steam generator's (HRSG's) supplementary-fired (natural gas) duct burner from 170 to 200 MMBtu/hr for each combined-cycle combustion turbine-electrical generator, EU-002 and EU-003, at the existing Brandy Branch Generating Station. No physical change is required to achieve this heat input rate increase. The change reflects the installed capacity of the HRSGs's duct burners. Also, each HRSG's duct burner will have a restriction on the hours of operation of 4,500 hours per consecutive 12-months to avoid PSD new source review. Specific condition B.43. adds a recordkeeping requirement for duct burner operation.

Miscellaneous.

Emissions Unit -001 is a simple cycle combustion turbine, permitted under air construction permit, No. 0310485-001-AC/PSD-FL-267. In the permit, specific condition "22" required an evaluation of the initial performance tests conducted for carbon monoxide (CO) using EPA Reference Method 10, 40 CFR 60, Appendix A, in order to determine if a reduction in the permit's CO limit was warranted (see below). The Department received a report of these tests dated October 2, 2002, and the Department decided that a reduction in the permit's CO limit was not warranted. However, this requirement has been carried continually in the Title V Permits (specific condition A.12.) since receiving the report. The requirement is considered to be obsolete and, therefore, the following paragraph from specific condition A.12. will be deleted:

A.12. "Within 18 months after the initial compliance test on the CT, the permittee shall prepare and submit for the Department's review and acceptance an engineering report regarding the lowest CO emission rate that can consistently be achieved firing natural gas. This lowest recommended rate shall include a reasonable operating

margin, taking into account long-term performance expectations and good operating and maintenance practices. The Department may revise the CO emission rate based upon this report."

Filename: 0310485.016.AV.Revision.SOB.JEA.Brandy.Branch.doc
Directory: O:\Bar\Title V\BRUCE\PERMITS\0310485.016.AV.Revision.017.AC.PSD.FL.310F.JEA.Brandy.Branch
Template: C:\Documents and Settings\friday_b\Application Data\Microsoft\Templates\Normal.dot
Title: (FOR TALLAHASSEE OFFICE USE ONLY)
Subject:
Author: Bruce Mitchell
Keywords:
Comments:
Creation Date: 8/1/2006 4:00:00 PM
Change Number: 13
Last Saved On: 8/31/2006 3:26:00 PM
Last Saved By: mitchell_b
Total Editing Time: 37 Minutes
Last Printed On: 9/1/2006 12:23:00 PM
As of Last Complete Printing
Number of Pages: 2
Number of Words: 629 (approx.)
Number of Characters: 3,583 (approx.)