PERMITTEE

Orlando Utilities Commission (OUC)
Reliable Plaza, 100 West Anderson
Orlando, Florida 32801

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. 0950137-045-AC
Stanton Energy Center
Minor Air Construction Permit
Units 1 and 2 Pollution Reduction Project

This is the final air construction permit that authorized the installation and operation of several pollutant reduction systems at the reference facility. Specifically, OUC is authorized to install Fuel Lean Gas Reburn (FLGR) systems on the fossil fuel-fired Units 1 and 2 at the Stanton Energy Center for additional nitrogen oxide (NO_X) reduction. In addition, OUC is authorized to upgrade the existing flue gas desulfurization (FGD) scrubber system on Unit 2 to help meet the sulfur dioxide (SO_2) emissions limit in the Mercury and Air Toxics (MATS) rule. Finally, OUC is authorized to install an activated carbon injection (ACI) system on Unit 2, similar to the temporary system previously authorized by Permit No. 0950137-042-AC. This system will be used in combination with chemical spray technology to mitigate mercury emissions.

NOTICE AND PUBLICATION

The Department distributed a draft minor air construction permit package on January 15, 2015. The applicant published the Public Notice in the Orlando Sentinel on January 24, 2015. The Department received the proof of publication on January 28, 2015.

COMMENTS

No comments on the Draft Permit were received from the public, the Department's Central District Office, or the EPA Region 4 Office.

Three minor comments were received from the applicant by e-mail on January 27, 2015. The comments resulted in clarifications and corrections that are not considered significant enough to reissue a revised draft permit and require another Public Notice, therefore, the draft permit was corrected. The following administrative type changes have been made in the final permit. Each of these comments are summarized below, along with the Department's response. The changes are highlighted in yellow with additions indicated by double underline and deletions indicated by ~~strikethrough~~.

Comment 1-Units 1 and 2 Heat Input Limit: Permit Condition 7. reads in part: "The FLGR systems will use natural gas-firing above the OFA zone in each unit of up to 10% of the permitted heat input rate (i.e., 400 million British thermal units per hour on a 4-hour block average)". This sentence implies that the units have a heat input limit of 4,000 MMBtu. The correct Heat Input limit for these units is 4,800 MMBtu on a 4 hr. block average.

Department Response: The comment was accepted by the Department as a typo error, and Condition 7. has been corrected in the final permit as follow:

7. Fuel Lean Gas Reburn (FLGR) Systems: The permittee is authorized to install FLGR systems on Units 1 and 2 as described in the application. The FLGR systems will use natural gas-firing above the OFA zone in each unit of up to 10% of the permitted heat input rate (i.e., ~~400~~ nominal 480 million British thermal units per hour on a 4-hour block average). Natural gas will displace coal or other authorized fuels. The heat input rate from the FLGR systems do not increase the maximum heat input rate for either unit. [Application No. 0950137-045-AC and Rule 62-210.200(PTE), F.A.C.]

Comment 2-Use of NaHS and/or Equivalent: Permit Condition 10. reads in part: "The permittee is authorized to use a chemical spray technology consisting of halogen-based additives such as calcium bromide (CaBr2) into the coal feeder and sodium hydrosulfide (NaHS) into the wet FGD system for Units 1 and 2". OUC requested authorization for the injection of sodium hydrosulfide (NaHS) or an equivalent sulfide-donating liquid agent, into the recirculating pumps of the wet flue gas desulfurization (WFGD) system. OUC requests the condition to be expanded to include equivalent sulfide donating agents as requested in the construction permit application.

Department Response: The comment was accepted by the Department as a clarification, and Condition 10. has been clarified in the final permit as follow:

10. ACI and Chemical Spray Technology: The permittee is authorized to install a portable ACI system for use on either Units 1 or 2. The permittee is authorized to use a chemical spray technology consisting of halogen-based additives such as calcium bromide ($CaBr_2$) into the coal feeder and sodium hydrosulfide (NaHS) or an equivalent sulfide-donating liquid agent, into the recirculating pumps of the wet FGD system for Units 1 and 2. The portable ACI system will be used in combination with chemical spray technology to mitigate mercury emissions. The portable ACI system may be used on either Unit 1 or Unit 2 as needed. [Application No. 0950137-045-AC]

Comment 3-Construction Permit Expiration Date: The draft permit was issued with an expiration date of December 31, 2015. The majority of the project must be completed during the unit outages. Unit 1's outage occurs in the spring of 2015, and the Unit 2 outage occurs in the fall of 2016. In order to fully complete the Unit 2 installation, performance verification and the request for an operating permit, OUC requests the expiration date to be extended to June 30, 2016.

Department Response: The Department agrees to this request and the expiration date of the permit will be extend until June 30, 2016.

CONCLUSION

The final action of the Department is to issue the final air construction permit No. 0950137-045-AC, with the minor changes, corrections and clarifications as described above.