

Orlando Utilities Commission
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June 27, 2008

Mr. Jonathan Holtom, Program Administrator
Florida Department of Environmental Protection
Title V Section
Division of Air Resource Management
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

**RE: ST. CLOUD GENERATING STATION
NOTIFICATION OF EXTENDED COLD SHUTDOWN
FACILITY ID No. 0970002**

Dear Mr. Holtom:

Orlando Utilities Commission (OUC) is contracted to perform operations and maintenance functions at the above-referenced St. Cloud Generating Station under an interlocal agreement with the City of St. Cloud. The facility, consisting of diesel-fired generating units and other miscellaneous insignificant emission units, commenced operation in the 1950s. OUC management has evaluated future demand and potential operation of this facility and determined that it is no longer economically feasible to operate these units in today's environment due to their age, condition and overall reliability. The determination has been made that the most prudent course of action is to shutdown the facility and put it into a cold standby mode. OUC has reviewed the applicable requirements and our understanding is summarized below.

- Florida Rule 62-210.300(2)(a)4 indicates that a unit may be on cold standby or long-term reserve shutdown if reasonable notification is provided of re-activation and compliance testing is conducted in a timely manner (e.g., within 30 days of startup), and that no modification or reconstruction of the unit occurred prior to re-activation.
- OUC would need to submit a letter to the Department (this letter) requesting this cold standby mode to confirm relief from testing and reporting requirements. This letter would be to meet the requirements of 210.300(2)(a)3.b.(I)-(III). Also, as required, the date of shut down is estimated to be July 30, 2008. OUC also confirms that the emissions units will be operating in compliance with all applicable rules as of the time the source is shut down. Finally, OUC unit agrees to and is legally prohibited from providing the allowable emissions permitted by the renewed permit as an emissions offset to any other person under Rule 62-212.500, F.A.C.
- The rule provides additional requirements in the event that a Title V (TV) permit expires and needs to be renewed while in the cold standby mode. The current TV permit (0970002-003-AV) was issued on March 1, 2007 and expires on February 28, 2012.

June 27, 2008

OUC will continue to submit an annual operating report (AOR) every year; even if it is only to indicate that the facility did not operate. In addition, OUC will also submit an annual TV Statement of Compliance (SOC), pursuant to the Title V permit, indicating that the facility did not operate. Finally, OUC will submit the annual emissions fee and form every year, accompanied by the minimum \$250 fee.

In the event that OUC considers reactivation of these emission units, a plan for demonstration of compliance with applicable limits will be submitted, along with a notification of the planned reactivation. Please do not hesitate to contact me at (407) 737-4236 if you should have any questions on this request.

Sincerely,

ORLANDO UTILITIES COMMISSION



Denise M. Stalls
Vice President Environmental Affairs

CITY OF ST. CLOUD



Tom Hurt
City Manager, City of St. Cloud
Responsible Official

cc: Byron Knibbs, OUC
Jan Aspuru, OUC