

## FINAL DETERMINATION

---

### PERMITTEE

Orlando Utilities Commission  
500 South Orange Avenue  
Post Office Box 3193  
Orlando, Florida 32802

### PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)  
Division of Air Resource Management  
Bureau of Air Regulation, Special Projects Section  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida 32399-2400

### PROJECT

Air Permit No. PSD-FL-373A  
Project No. 0950137-020-AC  
Orlando Utilities Commission (OUC)

The project is to construct a nominal 300 megawatts natural gas-fueled combined cycle unit (Unit B). The new equipment will be installed at the existing OUC Curtis H. Stanton Energy Center.

### NOTICE AND PUBLICATION

The Department distributed a Notice of Intent to Issue Air Permit package on March 25, 2008. The applicant published the Public Notice of Intent to Issue Air Permit in The Orlando Sun-Sentinel on April 2. The Department received the proof of publication on April 18. The Department granted an extension of time to file a petition for an administrative hearing on April 18. The permittee withdrew this request on May 2.

### COMMENTS

No comments on the Draft Permit were received from the public, the Orange County Environmental Protection Division, Department's Central District Office, the EPA Region 4 Office, the National Park Service or the Fish and Wildlife Service.

### Applicant

On April 23, the Department received comments from the applicant. The following summarizes the comments and the Department's response.

1. The applicant advised that a nominal 531 million Btu per hour (mmBtu/hr) duct burner (DB) contracted for the cancelled integrated coal gasification and combined cycle (IGCC) project will be used for the natural gas-fueled combined cycle project instead of the nominal 450 mmBtu/hr duct burner described in the application. The applicant requested that the final permit reflect the larger DB.

*Response:* The request to increase the nominal rating of the DB is acceptable. The applicant has not requested greater mass or concentration emissions from the larger DB. The Department has reasonable assurance that the larger DB can meet the mass and concentration limits established in the draft permit. The reason is that the combustion turbine-electrical generator (CTG) and DB emissions are not actually additive due to reburn phenomena that occur in the DB.

2. The applicant corrected the Department's description of the inlet air cooling system. It had been described by the Department as "inlet fogging" whereas the application refers to "evaporative cooling".

*Response:* The Department will correct the permit to reflect evaporative cooling instead of inlet fogging. No changes in emission mass rates or concentrations are required.

## FINAL DETERMINATION

---

3. The applicant corrected a condition regarding the option to use Method CTM-027 or EPA Method 320. The condition in the permit required use of both methods rather than an option to use one or the other.

*Response:* The Department will correct the affected condition (Section III, Condition 13.E) as requested by the applicant.

4. The applicant noted that Condition 24 of Section III describes continuous compliance with the 24-hour carbon monoxide (CO) and nitrogen oxides (NO<sub>x</sub>) standards but does not reflect the 12-month CO limitation specified in Condition 13.

*Response:* The Department concurs and will add the 12-month CO limitation to the continuous compliance requirements of Section III, Condition 24.

5. The applicant suggested that the units of operating rates in Section III, Condition 29 should be specified in mmBtu/hr.

*Response:* At present the units of operating rate are not specified. The Department agrees that mmBtu/hr are appropriate units for specifying combustion turbine and duct burner operating rates.

6. The applicant requested a change of stack height from 205 to 165 feet (ft).

*Response:* The original stack height of 205 ft was premised on the cancelled IGCC project for which modeling was originally conducted assuming much greater emissions. The Department requested and received dispersion model input and output files. After reviewing the additional information, the Department concurs that maximum project impacts will remain well below the Class II significant impact levels (SILs). Air quality impacts at the Chassahowitzka National Wilderness Area will also remain well below the PSD Class I SILs.

## CONCLUSION

The final action of the Department is to issue the permit with the revisions, corrections, and clarifications as described above.