Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

PERMITTEE

Orlando Utilities Commission (OUC)
Stanton Energy Center

Authorized Representative:
Mr. Chip Merriam, Vice President

Permit No. 0950137-050-AC/PSD-FL-084B
Permit Expires: December 31, 2017
Air Construction Permit
Project: Minor Source Air Construction Permit - Revisions
Orange County, Florida

PROJECT

This is the final air construction (AC) permit, which authorizes revisions to previously issued AC/PSD permits (Project). This facility is an existing electric power generation facility categorized under Standard Industrial Classification No. 4911. The existing Stanton Energy Center is located in Orange County at 5100 South Alafaya Trail in Orlando, Florida. UTM coordinates are: Zone 17, 483.6 km East and 3151.1 km North. Latitude is: 28° 29' 17" North; and, Longitude is: 81° 10' 03" West.

This final permit is organized into the following sections: Section I (General Information), Section II (Requirements); and, Section III (Emission(s) Unit(s) Specific Conditions). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section IV of this permit. [As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.]

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is <u>not</u> subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

David Lyle Read, P.E.
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For:

Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

SA/dlr/sms

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the persons listed below.

Mr. Chip Merriam, OUC: cmerriam@ouc.com
Mr. David R. Báez, OUC: dbaez@ouc.com
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Ms. Lynn Scearce, DEP OPC: lynn.scearce@dep.state.fl.us
U.S. EPA Region 4 NSR/PSD: nsrsubmittals@epa.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Lynn Scearce

2017.01.10 09:59:17 -05'00'

SECTION I. GENERAL INFORMATION

FACILITY DESCRIPTION

This facility consists of: two fossil fuel fired steam electric generating stations Unit Nos. 1 & 2 (E.U. ID Nos. 001 & 002); Stanton Unit A which consists of two nominal 170 megawatts (MW), General Electric "F" Class (PG7241FA) combustion turbine-electrical generators with two supplementary fired heat recovery steam generators (HRSG) (E.U. ID Nos. 025 & 026); Stanton Unit B which consists of one nominal 150 MW General Electric 7241 FA combustion turbine-electrical generator (CTG) with a supplementary fired heat recovery steam generator (HRSG) with natural gas fueled duct burners, and a nominal 150 MW steam turbine generator (STG) (E.U. ID No. 037); and, ancillary & auxiliary equipment.

Also included at this facility are miscellaneous insignificant emissions units and/or activities.

This project will affect the following *existing* permitted emissions units:

E.U. ID No.	Brief Description
001	Fossil Fuel Steam Generator (FFSG), Unit #1
002	FFSG, Unit #2

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- This facility operates units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

PROPOSED PROJECT

This project is for a minor source air construction (AC) permit for revisions to previously issued AC/PSD permits. The previously issued AC/PSD permits being revised pertain to FFSG, Units #1 & 2.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Minor Source Air Construction Permit Application received on November 22, 2016 (complete).

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance, Division of Air Resource Management, Florida Department of Environmental Protection (Department). The mailing address for the Office of Permitting and Compliance is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.

2. Compliance Authority: All documents related to compliance activities, such as reports, tests, and notifications, shall be submitted to the Compliance Authority. The Compliance Authority is listed on the cover page of the Title V air operation permit.

3. Appendices. The following Appendices are attached as part of this permit:
   a. Appendix A. Citation Formats and Definitions;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and,
   d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures. Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and, Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 & 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions. For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications. The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) & 62-212.300(1)(a), F.A.C.]

7. Source Obligation. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification. [Rule 62-212.400(12), F.A.C.]

8. Construction. **This permit authorizes the proposed project.** The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Office of Permitting and Compliance prior to the expiration of this permit. [Rules 62-210.300(1), 62-4.070(4) 62-4.080, and 62-4.210, F.A.C.]

This subsection of the permit addresses the following emissions units:

E.U. ID No.	Brief Description
001	FFSG, Unit #1
002	FFSG, Unit #2

This subsection of the permit addresses revisions to the SO_2 emission limits that apply to FFSG, Units # 1 & 2.

The revisions are for the addition of an SO_2 emission limit. This emission limit is based on an allowable SO_2 emissions rate that demonstrates compliance with the SO_2 National Ambient Air Quality Standard (NAAQS) in response to the U.S. Environmental Protection Agency's (U.S. EPA's) Data Requirements Rule (DRR) for future demonstration periods. Compliance with the new SO_2 emission limit shall occur on or before **January 13, 2017**.

Permits Being Modified:	PSD-FL-084. {Note: PSD-FL-084A was a revision to the original permit.}
Affected Emission Units:	FFSG, Units # 1 & 2 (E.U. ID Nos. 001 & 002)

The affected specific condition as cited below is hereby changed as follows (the remainder of the permit remains unchanged as a result of this permitting action):

Specific Condition 2.

Specific Condition 2. is changed as follows:

{For simplified reading, the important revisions are emphasized with yellow highlight in this electronic document. ~~Strikethrough~~ is used to denote the deletion of text and double-underlines are used to denote the addition of text.}

2. Emissions for each unit shall not exceed the allowable emission limits listed in the following Table for SO_2, PM, NOx and visible emissions. …

	Allowable Emission Limits
Pollutant	lb/MMBtu
PM	0.03
SO_2	1.14 (3 hr. average) and 90 percent reduction (30 day rolling average); and, 0.20 lb/million BTU heat input (30-boiler operating day average, as determined by CEMS) after ***January 13, 2017***.
	*{Permitting notes: Compliance with the new SO_2 emission standard of 0.20 lb/MMBtu of heat input based on a 30-boiler operating day average for all period of operation excluding startup and shutdown shall occur after **January 13, 2017**. In addition, the more stringent SO_2 emission limit assures compliance with the less stringent, yet applicable SO_2 emission standard from NSPS 40 CFR 60, Subpart Da.}*

…

The following are new conditions being added specifically for this part of the project, i.e., addition of the SO_2 emission limit.

No new or modified equipment (physical changes) or changes in methods of operation associated with this part of the project (SO_2 emission limit addition) are authorized under this permit.

PREVIOUS APPLICABLE REQUIREMENTS

1. Effect on Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for these emissions units. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070(1)&(3), *Reasonable Assurance*, F.A.C.]

CONFIRMATION REQUIREMENTS

2. Initial Confirmation: These emission units shall use the previously certified SO_2 CEMS data to confirm compliance with the new SO_2 emission limit of 0.20 lb/MMBtu. The initial compliance confirmation shall consist of the initial 30-day rolling average using SO_2 CEMS data collected during the first 30 boiler operating days following **January 13, 2017**. [Rules 62-4.070(1)&(3), *Reasonable Assurance*, F.A.C.; and, Application No. 0950137-050-AC/PSD-FL-084B.]

REPORTING REQUIREMENTS

3. Reports: The permittee shall prepare and submit a report summarizing the results of the initial confirmation demonstration. The report shall be submitted no later than 45 days following the conclusion of the demonstration period. Reports shall be prepared in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(10), F.A.C.; and, Application No. 0950137-050-AC/PSD-FL-084B.]