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June 26, 2006



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BUREAU OF AIR REGULATION

Mr. Jeff Koerner  
DEP/DARM  
North Permitting Section  
Division of Air Resource Management  
2600 Blair Stone Road MS 5500  
Tallahassee, Florida 32399-2400

Re: OUC Stanton Energy Center  
DEP Permit No. 0950137-009-AC  
Unit 1 Burner Replacement Project

Dear Mr. Koerner:

This letter serves to provide the data and reporting required by the above-referenced permit, Specific Condition 5, as follows:

5. Emissions Monitoring:

- a. *Completion of this project occurs when all burners have been installed and are operational. After completion of this project, the permittee shall monitor NO<sub>x</sub>, opacity, and SO<sub>2</sub> emissions consistent with the averaging times specified in Permit No. 0950137-006-AV. The monitoring period shall be conducted with the 6 new burners in operation. The permittee shall submit a report comparing the emissions data during this period to the specific emission limits in Permit No. 0950137-006-AV, within 60 days of completion of this project. The permittee shall provide a statement as to whether or not the unit is in compliance with the specific emission limits in Permit No. 0950137-006-AV. [Rule 62-4.070(3), F.A.C.]*
- b. *The actual operating rates of Unit No. 1 during this monitoring period, specifically, heat input {MMBtu/hr}, electrical output {MW}, type(s) of fuel(s) fired shall be provided in the report. The number of burners in operation, identification and their respective locations shall also be included in the report. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]*

The above-referenced project was completed on March 20, 2006 and notification of completion was provided to the Department via e-mail on March 27, 2006. Therefore, per Condition 5 above, the study period began on March 20<sup>th</sup> and concluded on April 20<sup>th</sup>. Test results are due within 60 days of commencement of the study period, or by May 20, 2006. These results were forwarded via e-mail on May 16, 2006 with a hard copy follow up shortly after (i.e., this report).

Specifically, permitted limits for Unit No. 1 are as follows:

- SO<sub>2</sub> - 1.2 lb/MMBtu (30 day rolling average) and 1.2 lb/MMBtu/hr (2 hour emission rate);
- Opacity – 20 percent opacity (6-minute average), except for one 6-minute period per hour not to exceed 27 percent opacity; and

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- NO<sub>x</sub> - 0.60 lb/MMBtu heat input (30-day rolling average), and 0.46 lb/MMBtu heat input on an annual average.

A comparison of the CEM data for the study period to the permit limits indicates that the unit is in compliance with the specific emission limits in Permit No. 0950137-006-AV. A plot of SO<sub>2</sub> emissions (Figure 1), based conservatively on 2-hour averages, shows that the monitored values are consistently less than one-half to one-third of the allowable standard. A plot of the opacity data (Figure 2) shows a similar trend. A plot of the NO<sub>x</sub> data is not provided, as the averaging period was 30 days and there were 30 days of data, resulting in one data point. However, the 30-day average of 0.36 lb/MMBtu was less than the 0.60 lb/MMBtu limit, based on a 30-day rolling average.

Graphical depictions of the hourly average heat input and MW values are also provided for the study period. Heat input values are within current permit limits and both the heat input and MW data are consistent with historical values (Figures 3 and 4, respectively). The unit continues to fire bituminous coal.

Finally, all six of the recently replaced burners were in service during the study period. The new burners are located on pulverizer 4 in the third row of burners. Their identification numbers are 4307, 4308, 4309, 4310, 4311 and 4312 (see attached Unit 1 Boiler Figure).

If you should have any questions with respect to this letter and attachments, please don't hesitate to contact me at (407) 658-6444 or Scott Osbourn at (813) 287-1717.

Sincerely,

*Louis M. Brown*

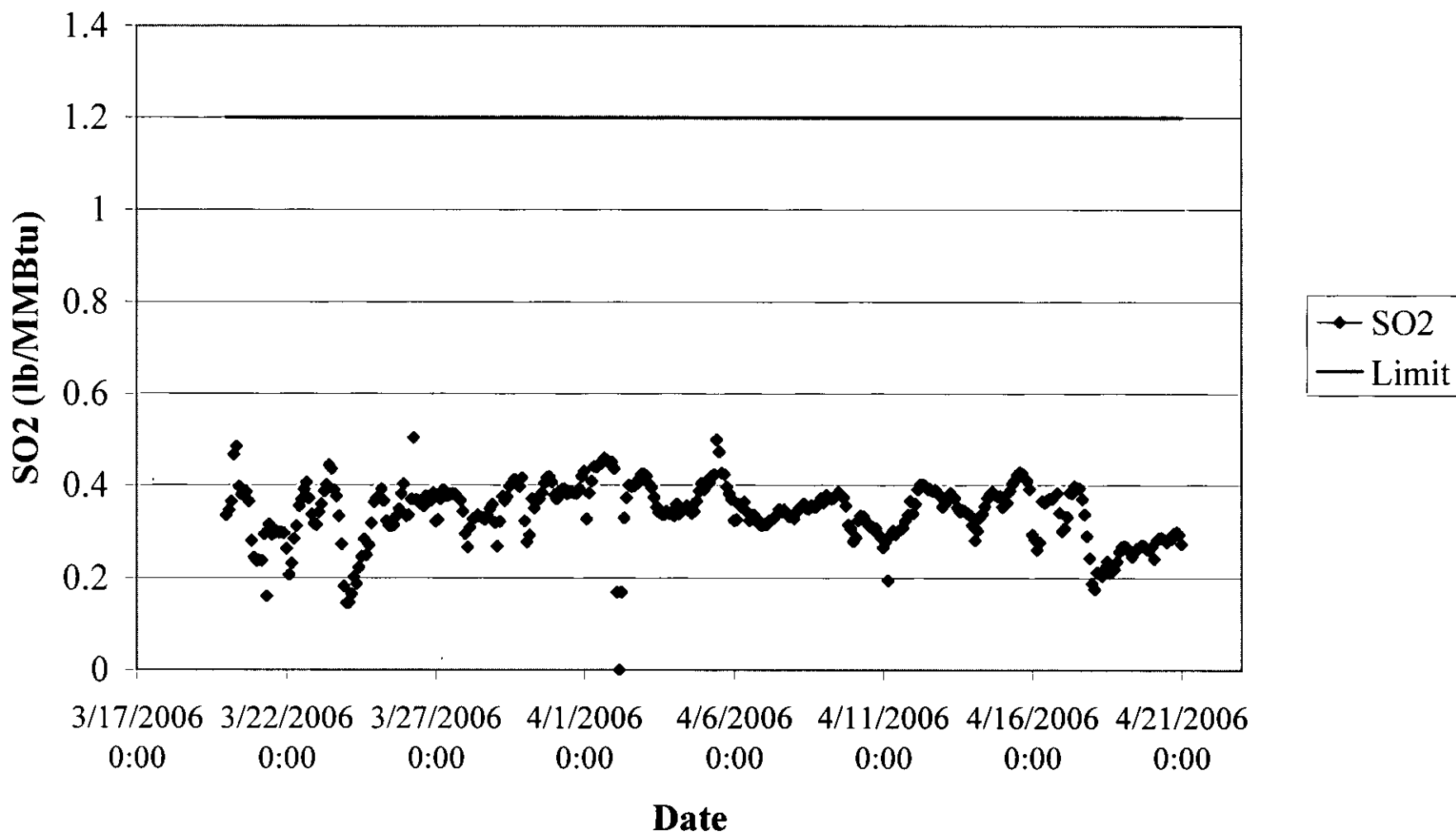
Louis Brown  
Senior Environmental Engineer

cc: Scott Osbourn, P.E., Golder Associates Inc.

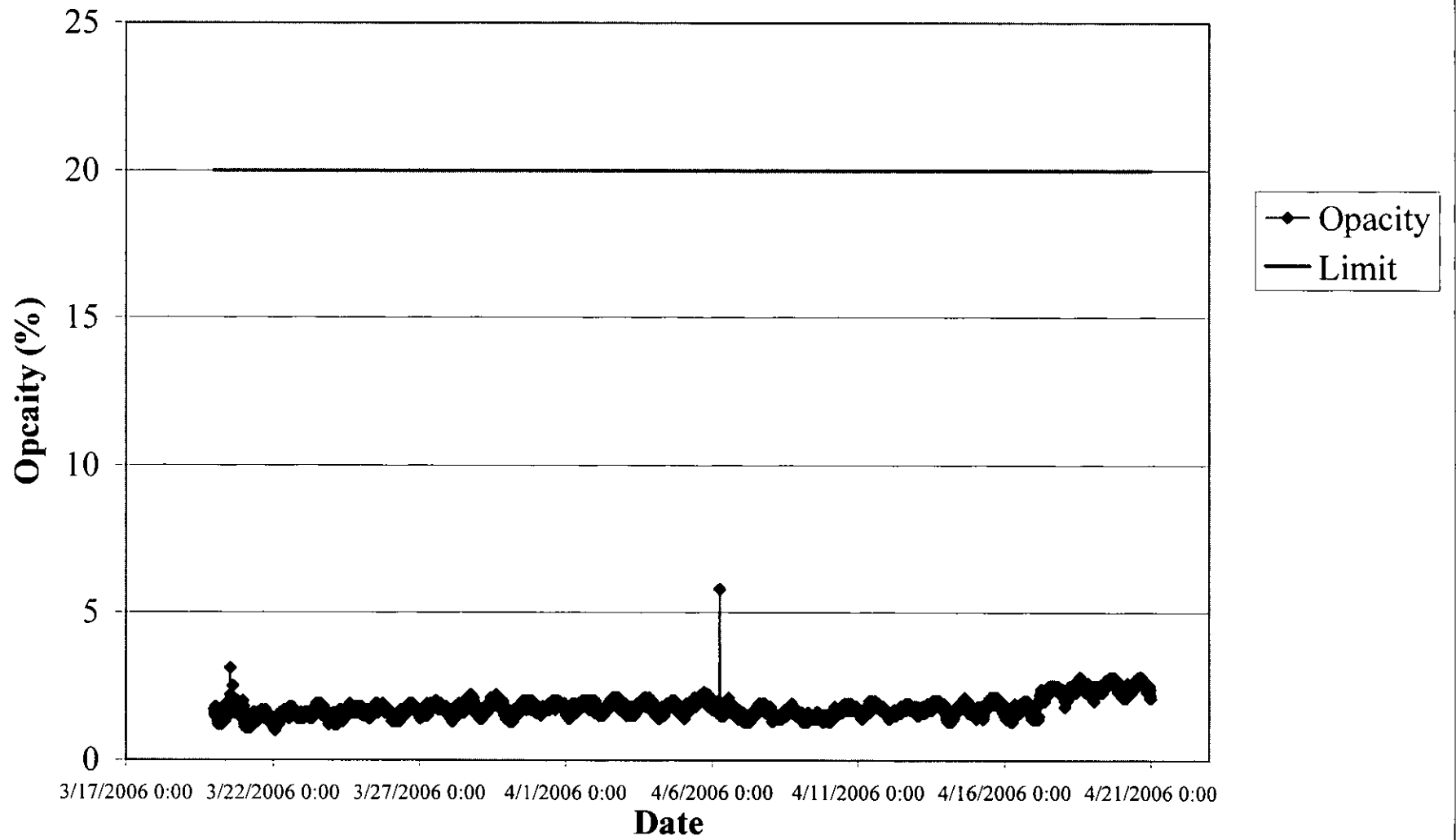
*cc: Center District*

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7/21/06*

**Figure 1. SO2 Emissions**



**Figure 2. Opacity (%)**



# NOx

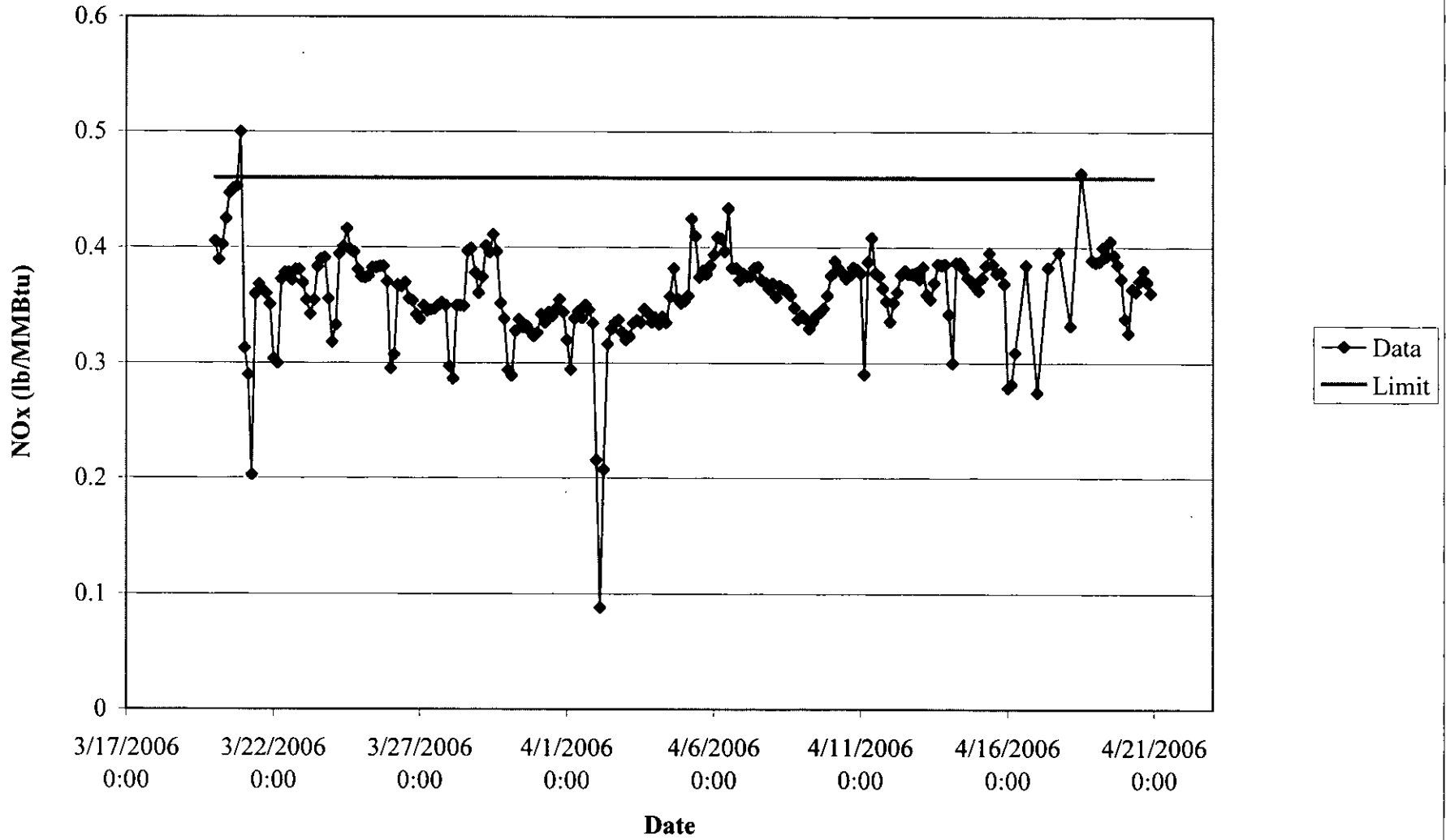


Figure 3. Heat Input

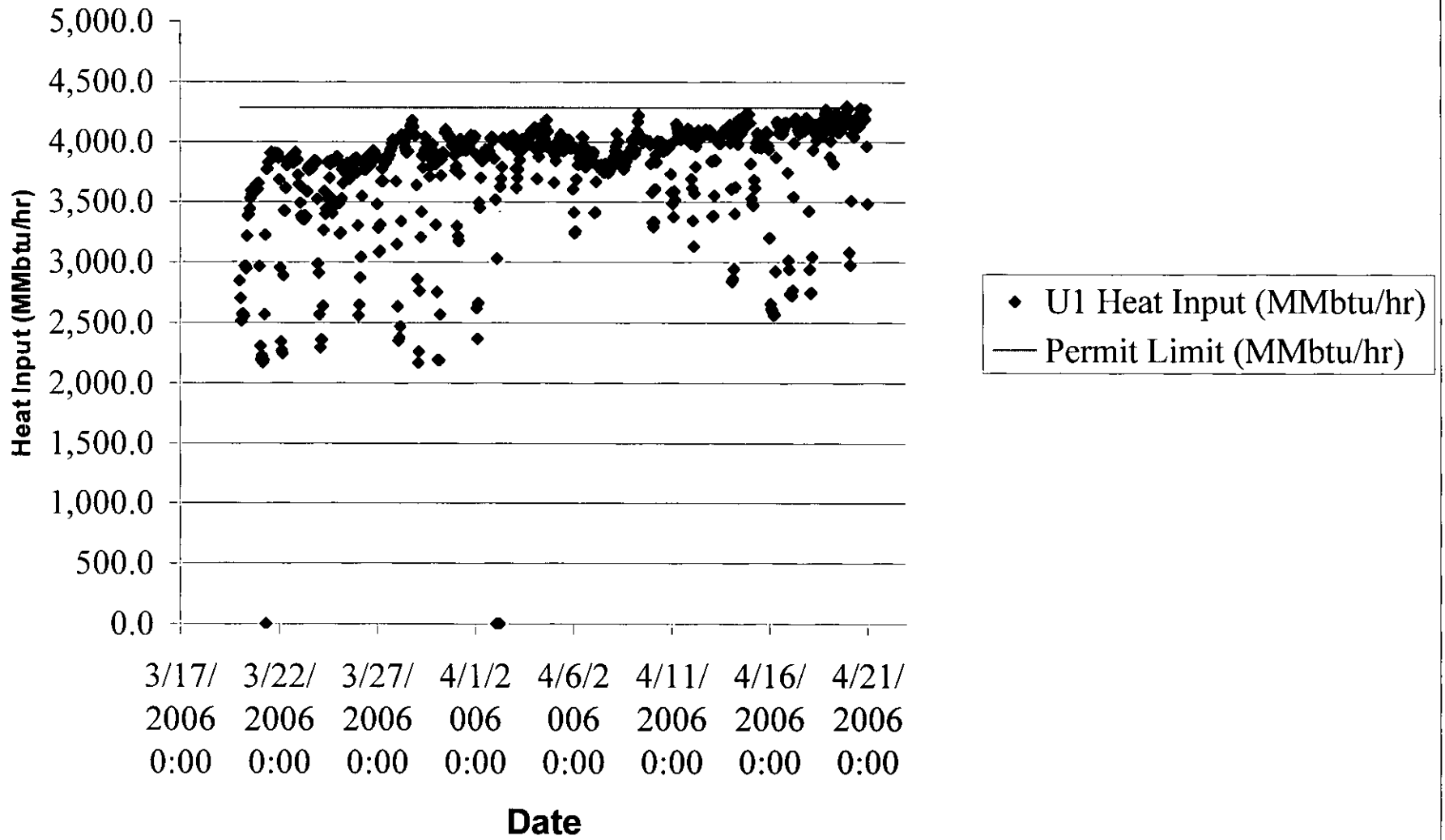
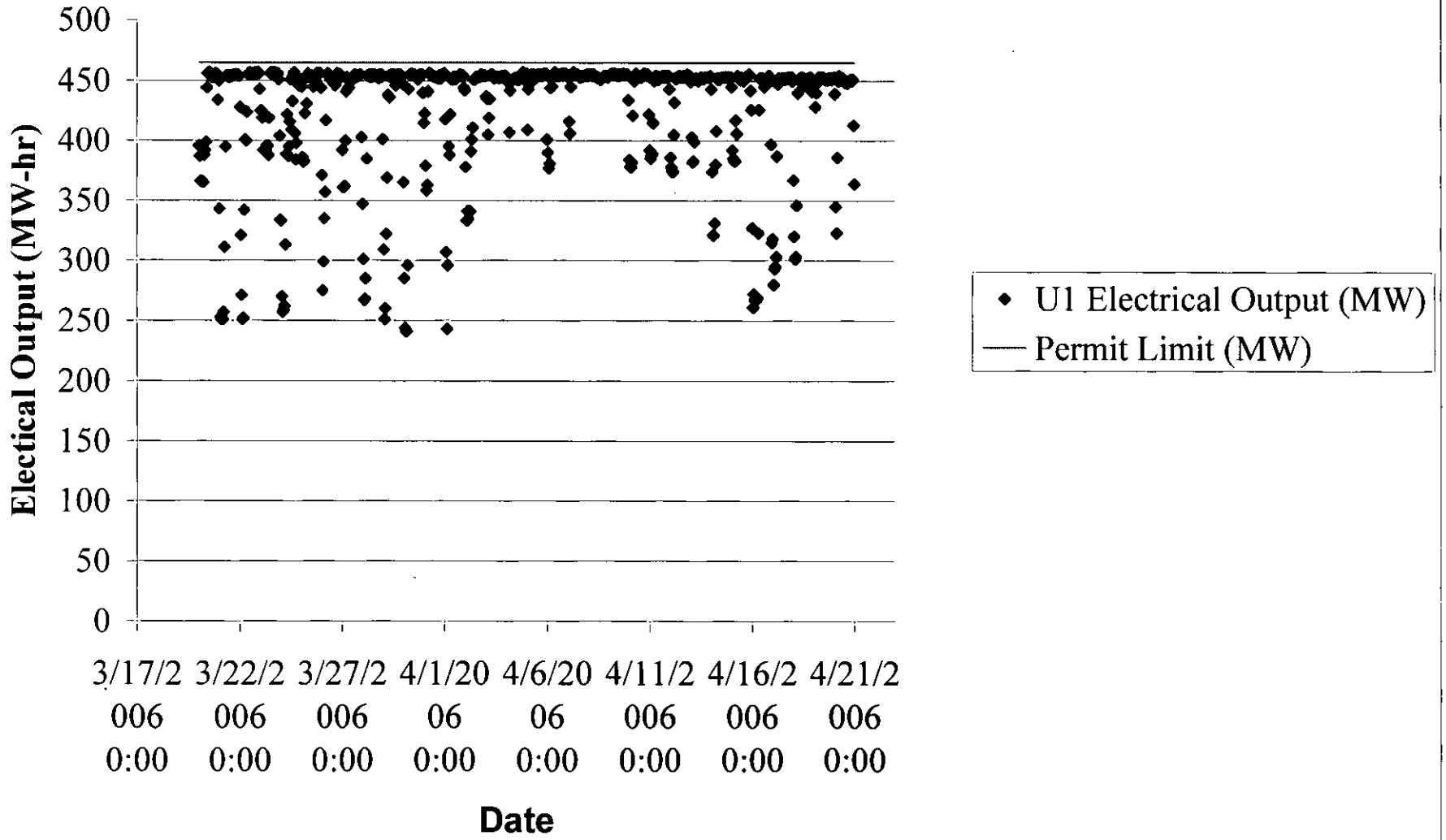
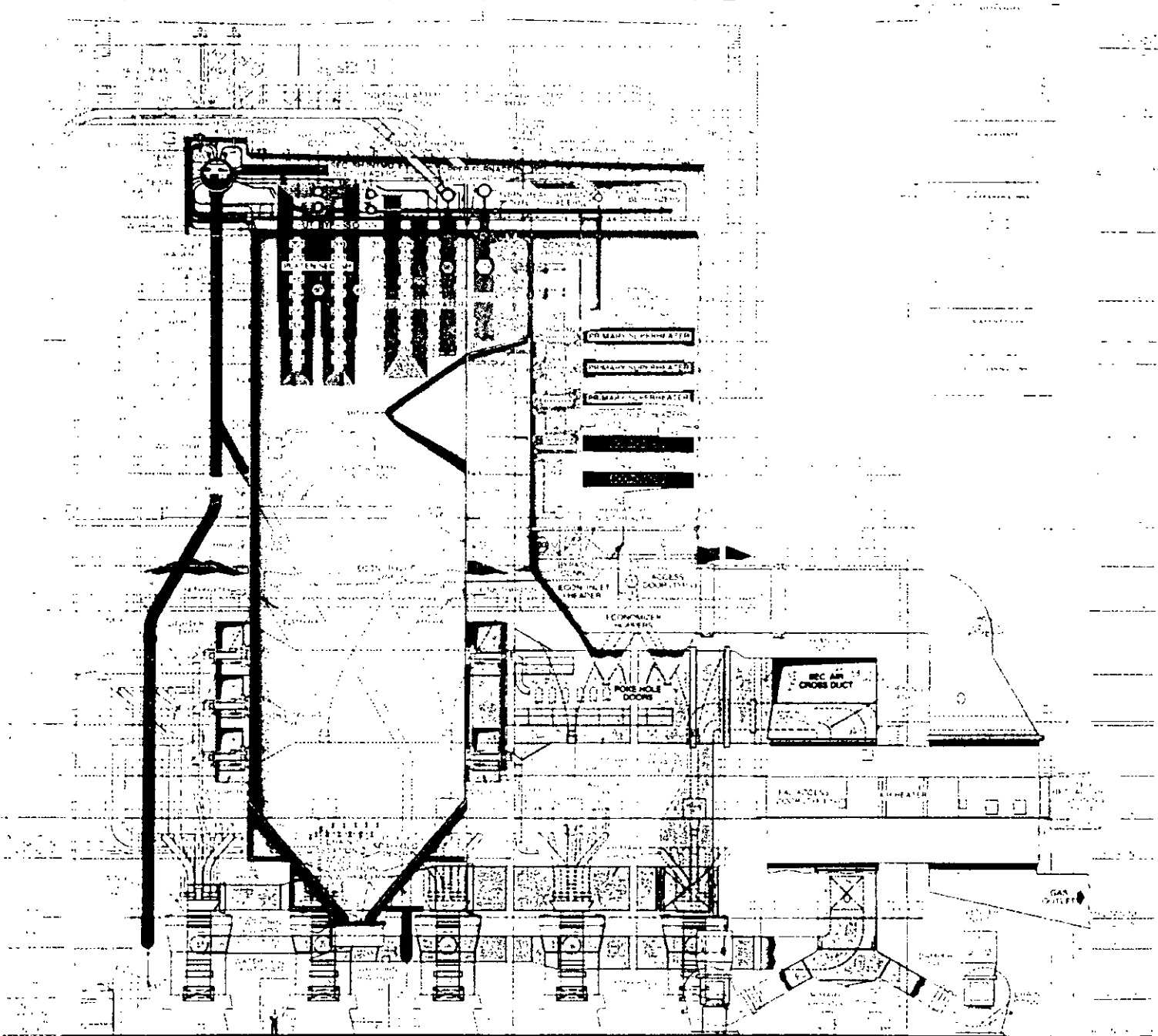


Figure 4. MW Output





ORLANDO UTILITIES COMMISSION  
 STANTON ENERGY CENTER, UNIT NO. 1  
 ORLANDO, FLORIDA

- AIR
- GAS
- WATER
- STEAM
- HEAT

