

Florida Department of  
Environmental Protection

**Memorandum**

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TO: Joseph Kahn

THRU: Trina Vielhauer *TV*  
Jeff Koerner *JK*

FROM: Jonathan Holtom *J.H.*

DATE: March 14, 2008

SUBJECT: Project No. 0950137-019-AC  
Final Construction Permit For Orlando Utilities Commission (OUC)  
Unit 2 Secondary Superheater Tube Replacement Project

Attached for your approval and signature is a final construction permit for OUC's Stanton Energy Center. This permit authorizes the replacement of the secondary superheater tubes for Unit 2.

The Public Notice requirements were met on February 21<sup>st</sup> by publishing in the Orlando Sentinel. No comments were received from either the public or the applicant, in response to this Public Notice. No petitions were filed for an Administrative Hearing.

I recommend your approval and signature.

Attachments

TLV/jk/jh

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
**NOTICE OF FINAL PERMIT**

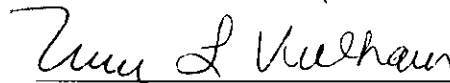
In the Matter of an Application for Permit by:  
Jan C. Aspuru, Vice President, Power Resources.  
Orlando Utilities Commission  
Post Office Box 3193  
Orlando, Florida 32802

Air Permit No. 0950137-019-AC  
Stanton Energy Center  
Orange County

Enclosed is Final Permit Number 0950137-019-AC. This permit authorizes the replacement of the secondary superheater tubes on Unit 2. This permit is issued pursuant to Chapter 403, Florida Statutes.

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.



Trina L. Vielhauer, Chief  
Bureau of Air Regulation

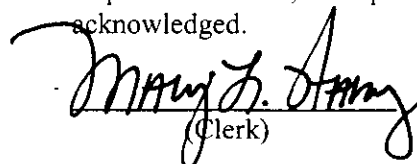
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Determination and the Final Permit) was sent by e-mail with return receipt requested before the close of business on 3/19/08 to the persons listed:

Jan C. Aspuru, OUC: [jaspuru@ouc.com](mailto:jaspuru@ouc.com)  
Denise M. Stalls, OUC: [dstalls@ouc.com](mailto:dstalls@ouc.com)  
Jim Bradner, DEP CD: [james.bradner@dep.state.fl.us](mailto:james.bradner@dep.state.fl.us)  
Lori Cunniff, Orange County EPD: [lori.cunniff@ocfl.net](mailto:lori.cunniff@ocfl.net)  
Jim Little, EPA Region 4: [little.james@epamail.epa.gov](mailto:little.james@epamail.epa.gov)  
Katy Forney, EPA Region 4: [forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov)  
Scott Osbourn, P.E., Golder Associates: [sosbourn@golder.com](mailto:sosbourn@golder.com)  
Mike Halpin, DEP Siting: [mike.halpin@dep.state.fl.us](mailto:mike.halpin@dep.state.fl.us)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**  
**FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

 3/19/08  
(Clerk) (Date)

## **FINAL DETERMINATION**

Orlando Utilities Commission  
Stanton Energy Center  
Air Permit No. 0950137-019-AC

The Department distributed a public notice package on February 15, 2008, to authorize the replacement of the secondary superheater tubes for Unit 2 at the OUC Stanton Energy Center, which is located at 5100 Alafaya Trail, Orlando, Orange County. The Public Notice of Intent to Issue was published in the Orlando Sentinel on February 21, 2008.

### **COMMENTS/CHANGES**

No comments were received from the public or from the applicant.

### **CONCLUSION**

The final action of the Department is to issue the final permit as it was issued in the draft permit.



# Florida Department of Environmental Protection

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

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## PERMITTEE:

Orlando Utilities Commission (OUC)  
P.O. Box 3193  
Orlando, Florida 32802

### *Authorized Representative:*

Jan C. Aspuru, Vice President, Power Resources

Permit No. 0950137-019-AC  
Curtis H. Stanton Energy Center  
Stanton Unit 2  
SIC No. 4911  
Secondary Superheater Tube Replacement Project  
Orange County, Florida  
Permit Expires: March 31, 2009

## PROJECT AND LOCATION

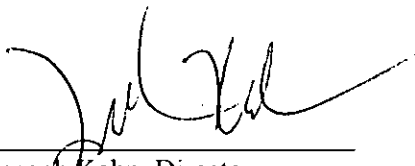
This permit authorizes the replacement of the secondary superheater tubes on Unit 2 at the OUC Curtis H. Stanton Energy Center. The facility is located at 5100 Alafaya Trail, Orlando, Orange County.

## 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.) and Title 40, Part 60 of the Code of Federal Regulations (CFR). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Florida Department of Environmental Protection (the Department).

## CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendix GC

  
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Joseph Kahn, Director  
Division of Air Resource Management

3/18/08  
(Date)

JK/tlv/jfk/jh

## SECTION 1. GENERAL INFORMATION

### FACILITY AND PROJECT DESCRIPTION

The existing facility consists of two 468 megawatt (MW) fossil fuel fired steam electric generating units (Units 1 and 2), and one 640 MW combined cycle unit. There are storage and handling facilities for solid fuels, fly ash, limestone, gypsum, slag, and bottom ash.

As noted above, the project under this permit is for the replacement of the secondary superheater tubes on Unit 2. The tubes are being repaired and replaced because metallurgical analyses indicate advanced and irreparable erosion. The new replacement tubes are characterized as functionally equivalent or a "like-kind" replacement, although the type of replacement material (SA213 TP304H) will be slightly different from the existing material and is expected to be more corrosion resistant than the existing material. The project is scheduled to begin on March 15, 2008, will require about 8 weeks to complete, and is estimated to cost about \$5 million.

EU ID	Emissions Unit Description
002	Fossil Fuel Fired Steam Electric Generator No. 2

### REGULATORY CLASSIFICATION

The facility is a potential major source of hazardous air pollutants (HAP).

The facility operates existing units subject to the Acid Rain provisions of Title IV of the Clean Air Act (CAA).

The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.

The facility is a major Prevention of Significant Deterioration (PSD) stationary source in accordance with Rule 62-212.400, F.A.C.

The facility operates units subject to the Standards of Performance for New Stationary Sources pursuant to 40 CFR Part 60.

The facility is subject to the Federal Clean Air Interstate Rule (CAIR) in accordance with the Final Department Rules issued pursuant to CAIR as implemented by the Department in Rule 62-296.470, F.A.C.

The facility is subject to the Federal Clean Air Mercury Rule (CAMR) implemented by the Department in Rule 62-296.480, F.A.C.

The facility operates units that were certified under the Florida Power Plant Siting Act, 403.501-518, F.S.

### RELEVANT DOCUMENTS

The following relevant documents are not a part of this permit, but helped form the basis for this permitting action: the permit application and the Department's Technical Evaluation and Preliminary Determination.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The Permitting Authority for this project is the Bureau of Air Regulation in the Division of Air Resource Management of the Department. The mailing address for the Bureau of Air Regulation 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 Central District Office. The mailing address and phone number of the Central District Office are: Department of Environmental Protection, Central District Office, 3319 Maguire Boulevard, Suite 232, Orlando Florida 32803-3767. Telephone: (407) 894-7555. Fax: (407) 897-5963.
3. Appendices: The following Appendix is attached as part of this permit: Appendix GC (General Conditions).
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, 62-214, 62-296, and 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: No emissions unit shall be constructed or 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) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes specific modifications and/or new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Bureau of Air Regulation with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

### SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS

This section of the permit addresses the following existing emissions unit.

#### Emissions Unit 002

Fossil Fuel Fired Steam Generator 2 is a wall-fired, dry bottom boiler, firing pulverized coal as the primary fuel and No. 6 fuel oil for purposes of startup and flame stabilization. The unit has a maximum heat input rate of 4,286 million British thermal units (MMBtu) per hour with a nominal generating capacity of 468 MW. The unit is equipped with an electrostatic precipitator (ESP) for control of particulate matter (PM/PM<sub>10</sub>), a wet flue gas desulfurization (WFGD) system for sulfur dioxide (SO<sub>2</sub>) control, and low NO<sub>x</sub> burners for nitrogen oxides (NO<sub>x</sub>) control. Unit 2 is also equipped with a selective catalytic reduction (SCR) system for further control of NO<sub>x</sub> emissions. The following parameters are continuously monitored: NO<sub>x</sub>, opacity, SO<sub>2</sub>, carbon dioxide (CO<sub>2</sub>), and stack gas flow rate.

#### APPLICABLE STANDARDS AND REGULATIONS

1. Applicable Requirements: Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. The requirements of this permit are in addition to all other applicable requirements. [Rule 62-210.300, F.A.C.]

#### GENERAL OPERATION REQUIREMENTS

2. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4), F.A.C.]
3. 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 exceeding its projected actual emissions, 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)(c), F.A.C.]

#### AUTHORIZED REPAIRS AND REPLACEMENT

4. Secondary Superheater Tubes: The permittee is authorized to repair/replace the secondary superheater tubes for Unit 2, as described in the application. The new replacement tubes are characterized as functionally equivalent or a "like-kind" replacement, although the type of replacement material will be slightly different from the existing material and is expected to be more corrosion resistant than the existing material. This permit only authorizes the repair/replacement of the secondary superheater tubes and does not authorize any increases in allowable heat input or allowable pollutant emissions rates.  
[Applicant Request.]

#### REPORTING AND NOTIFICATION REQUIREMENTS

5. Notification: Within one week of commencing the secondary superheater tube replacement project, the permittee shall notify the Compliance Authority that the project has commenced and provide a general schedule of construction activities. Within one week following the end of construction, the permittee shall notify the Compliance Authority that the project was completed.  
[Rule 62-4.210, F.A.C.]

### SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS

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6. PSD Applicability Monitoring and Reporting Requirements:

- a. The permittee shall monitor the emissions of NO<sub>x</sub>, SO<sub>2</sub>, CO, PM, SAM, lead and VOC; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years from the issuance date of this permit. Emissions shall be computed in accordance with Rule 62-210.370, F.A.C.
- b. The permittee shall report to the Department within 60 days after the end of each year during which records must be generated under subparagraph 62-212.300(1)(e)1., F.A.C., setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
  1. The name, address and telephone number of the owner or operator of the major stationary source;
  2. The annual emissions as calculated pursuant to subparagraph 62-212.300(1)(e)1., F.A.C.;
  3. If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and,
  4. Any other information that the owner or operator wishes to include in the report.
- c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1. and 2., F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

[Rule 62-212.300(1)(e), F.A.C.]

7. Computation of Emissions: The owner or operator shall compute emissions in accordance with the requirements set forth below:

- a. **Basic Approach.** The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
  1. If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
  2. If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
  3. If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- b. **Continuous Emissions Monitoring System (CEMS).**
  1. An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
    - (a) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and



### SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS

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quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or

- (b) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
  2. Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
    - (a) A calibrated flowmeter that records data on a continuous basis, if available; or
    - (b) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
  3. The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other 63 necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- c. Mass Balance Calculations.
1. An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
    - (a) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and
    - (b) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
  2. Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
  3. In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- d. Emission Factors.
1. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
    - a. If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
    - b. Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
    - c. The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by

### SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS

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converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.

2. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- e. Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- f. Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- g. Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- h. Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370

## SECTION 4. APPENDIX GC – GENERAL CONDITIONS

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The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
  - a. Have access to and copy and records that must be kept under the conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of non-compliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

## SECTION 4. APPENDIX GC – GENERAL CONDITIONS

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9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - a. Determination of Best Available Control Technology (Not Applicable);
  - b. Determination of Prevention of Significant Deterioration (Not Applicable);
  - c. Compliance with New Source Performance Standards (Not Applicable).
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - 1) The date, exact place, and time of sampling or measurements;
    - 2) The person responsible for performing the sampling or measurements;
    - 3) The dates analyses were performed;
    - 4) The person responsible for performing the analyses;
    - 5) The analytical techniques or methods used; and
    - 6) The results of such analyses.

When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**Harvey, Mary**

**From:** Harvey, Mary  
**Sent:** Wednesday, March 19, 2008 9:49 AM  
**To:** 'Jan C. Aspuru, OUC:; 'Denise M. Stalls, OUC:; Bradner, James; 'Lori Cunniff, Orange County EPD:; 'Jim Little, EPA Region 4:; 'Katy Forney, EPA Region 4:; 'Scott Osbourn, P.E., Golder Associates:; Halpin, Mike  
**Cc:** Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** FINAL CONSTRUCTION PERMIT FOR ORLANDO UTILITIES COMMISSION (OUC) - PROJECT NO. 0950137-019-AC-FINAL  
**Attachments:** ~~0950137-019-AC-F~~\_pdf.zip

Tracking:	Recipient	Delivery
	<del>'Jan C. Aspuru, OUC:'</del>	
	<del>'Denise M. Stalls, OUC:'</del>	
	Bradner, James	Delivered: 3/19/2008 9:49 AM
	'Lori Cunniff, Orange County EPD:'	
	'Jim Little, EPA Region 4:'	
	'Katy Forney, EPA Region 4:'	
	<del>'Scott Osbourn, P.E., Golder Associates:'</del>	
	<del>Halpin, Mike</del>	Delivered: 3/19/2008 9:49 AM
	<del>Holtom, Jonathan</del>	Delivered: 3/19/2008 9:49 AM
	Walker, Elizabeth (AIR)	Delivered: 3/19/2008 9:49 AM
	<del>Gibson, Victoria</del>	Delivered: 3/19/2008 9:49 AM

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:  
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

3/19/2008

## Harvey, Mary

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**From:** Halpin, Mike  
**To:** Harvey, Mary  
**Sent:** Wednesday, March 19, 2008 9:50 AM  
**Subject:** Read: FINAL CONSTRUCTION PERMIT FOR ORLANDO UTILITIES COMMISSION (OUC) - PROJECT NO. 0950137-019-AC-FINAL

Your message

**To:** 'Jan C. Aspuru, OUC:>'; 'Denise M. Stalls, OUC:>'; Bradner, James; 'Lori Cunniff, Orange County EPD:>'; 'Jim Little, EPA Region 4:>'; 'Katy Forney, EPA Region 4:>'; 'Scott Osbourn, P.E., Golder Associates:>'; Halpin, Mike  
**Cc:** Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** FINAL CONSTRUCTION PERMIT FOR ORLANDO UTILITIES COMMISSION (OUC) - PROJECT NO. 0950137-019-AC-FINAL  
**Sent:** 3/19/2008 9:49 AM

was read on 3/19/2008 9:50 AM.

## Harvey, Mary

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**From:** Gibson, Victoria  
**To:** Harvey, Mary  
**Sent:** Wednesday, March 19, 2008 9:50 AM  
**Subject:** Read: FINAL CONSTRUCTION PERMIT FOR ORLANDO UTILITIES COMMISSION (OUC) - PROJECT NO. 0950137-019-AC-FINAL

Your message

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**Cc:** Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria  
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**Sent:** 3/19/2008 9:49 AM

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## Harvey, Mary

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**From:** Osbourn, Scott [Scott\_Osbourn@golder.com]  
**To:** undisclosed-recipients  
**Sent:** Wednesday, March 19, 2008 10:03 AM  
**Subject:** Read: FINAL CONSTRUCTION PERMIT FOR ORLANDO UTILITIES COMMISSION (OUC) - PROJECT NO. 0950137-019-AC-FINAL

Your message

**To:** Scott\_Osbourn@golder.com  
**Subject:**

was read on 3/19/2008 10:03 AM.



## Harvey, Mary

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**From:** Holtom, Jonathan  
**To:** Harvey, Mary  
**Sent:** Wednesday, March 19, 2008 10:02 AM  
**Subject:** Read: FINAL CONSTRUCTION PERMIT FOR ORLANDO UTILITIES COMMISSION (OUC) - PROJECT NO. 0950137-019-AC-FINAL

Your message

**To:** 'Jan C. Aspuru, OUC:>'; 'Denise M. Stalls, OUC:>'; Bradner, James; 'Lori Cunniff, Orange County EPD:>'; 'Jim Little, EPA Region 4:>'; 'Katy Forney, EPA Region 4:>'; 'Scott Osbourn, P.E., Golder Associates:>'; Halpin, Mike  
**Cc:** Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** FINAL CONSTRUCTION PERMIT FOR ORLANDO UTILITIES COMMISSION (OUC) - PROJECT NO. 0950137-019-AC-FINAL  
**Sent:** 3/19/2008 9:49 AM

was read on 3/19/2008 10:02 AM.

**Harvey, Mary**

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**From:** Stalls, Denise M. [DStalls@ouc.com]  
**Sent:** Wednesday, March 19, 2008 11:30 AM  
**To:** Harvey, Mary  
**Subject:** RE: FINAL CONSTRUCTION PERMIT FOR ORLANDO UTILITIES COMMISSION (OUC) - PROJECT NO. 0950137-019-AC-FINAL

**received**

---

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Wednesday, March 19, 2008 9:49 AM  
**To:** Aspuru, Jan; Stalls, Denise M.; Bradner, James; Lori Cunniff, Orange County EPD;; Jim Little, EPA Region 4;; Katy Forney, EPA Region 4;; Scott Osbourn, P.E., Golder Associates;; Halpin, Mike  
**Cc:** Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** FINAL CONSTRUCTION PERMIT FOR ORLANDO UTILITIES COMMISSION (OUC) - PROJECT NO. 0950137-019-AC-FINAL

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:  
<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,

DEP, Bureau of Air Regulation

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

3/19/2008

**Harvey, Mary**

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3/19/2008

## Harvey, Mary

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**From:** Aspuru, Jan [JAspuru@ouc.com]  
**To:** Harvey, Mary  
**Sent:** Wednesday, March 19, 2008 2:20 PM  
**Subject:** Read: FINAL CONSTRUCTION PERMIT FOR ORLANDO UTILITIES COMMISSION (OUC) - PROJECT NO. 0950137-019-AC-FINAL

Your message

**To:** JAspuru@ouc.com  
**Subject:**

was read on 3/19/2008 2:20 PM.