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BUREAU OF AIR REGULATION

Mr. Al Linero, P.E.
FDEP South Permitting Section
Division of Air Resource Management
2600 Blair Stone Road
Mail Stop 5500
Tallahassee, FL 32399

Subject: OUC Stanton Permit No. 0950137-015-AC
Curtis H. Stanton Energy Center Units 1 and 2
Low NO_x Burners and Overfire Air
0950137-022-AC

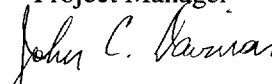
Dear Mr. Linero:

On behalf of Orlando Utilities Commission (OUC) and in accordance with the March 25, 2008 email from David Read, Black & Veatch has attached a March 7, 2008 letter to Joseph Kahn requesting minor changes to the subject permit. The attached letter contains my professional engineer's seal and signature as requested in Mr. Read's email.

OUC and Black & Veatch appreciate the responsiveness of your staff in addressing these permit conditions. Should you have any questions or concerns regarding this submittal, please do not hesitate to contact me at (913) 458-3380 or Louis Brown of OUC at (407) 658-6444.

Sincerely,

John C. Davisson
Project Manager


Black & Veatch

cc: David Read, FDEP
Denise Stalls, OUC
Louis Brown, OUC
David Baez, OUC
Brian O'Neal, B&V
Mike Soltys, B&V
Salvatore Falcone, B&V



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March 7, 2008

Mr. Joseph Kahn – Director
Division of Air Resource Management
Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: OUC Stanton Permit No. 0950137-015-AC
Curtis H. Stanton Energy Center Units 1 and 2
Low NO_x Burners and Overfire Air

Dear Mr. Kahn:

On behalf of Orlando Utilities Commission (OUC), Black & Veatch requests minor changes to the subject permit issued by your office in February 2008. One of the changes involves a correction to a condition and the other is needed due to the inability to install the required equipment in time to meet another condition.

In Section 3, Emissions Units Specific Conditions, the wording in Condition 12, Initial Compliance Demonstration needs to be revised to eliminate the reference to fuel oil. The units will only start up on fuel oil and are not capable of full load testing with fuel oil (see description of Emission Units 1 and 2 at the beginning of Section 3). The requested wording is *"Tests shall be conducted between 90% and 100% of permitted capacity while firing coal"*.

In Section 4, Appendix CEMS, we request that one of the deadline dates in Condition 5, Timelines be changed. OUC has received confirmation from the equipment vendor that the June 30, 2008 date for Unit 2 is not attainable and that an additional three months will be needed to complete installation and testing. The requested wording is *"The owner or operator shall install the CO-CEMS required by this permit and conduct the appropriate performance specification for the CO-CEMS no later than September 30, 2008, for Unit 2..."*.

OUC and Black & Veatch appreciate the opportunity to work with the Department in obtaining and revising the Stanton air quality permits. Should you have any questions or concerns regarding this submittal, please do not hesitate to contact me at (913) 458-7563 or Louis Brown of OUC at (407) 658-6444.

Sincerely,

Mike Soltys
Site Certification Coordinator
Black & Veatch

cc: Al Linero, FDEP
Denise Stalls, OUC
Louis Brown, OUC