Sheplak, Scott

From: Linero, Alvaro

Sent: Friday, June 08, 2007 6:31 PM

To: Sheplak, Scott; Adams, Patty

Subject: FW: Request for Extension, Project Number 0950137-012-AC

----Original Message-----

From: Falcone, Salvatore J. (Sal) [mailto:FalconeSJ@bv.com]

Sent: Fri 6/8/2007 5:55 PM

To: Linero, Alvaro

Cc: Halpin, Mike; Denise Stalls @ OUC; Louis Brown @ OUC; Soltys, J. Michael (Mike); Rollins, Myron R.; Hillman, Timothy M.;

O'Neal, Brian D.

Subject: Request for Extension, Project Number 0950137-012-AC

Mr. Linero,

On behalf of Orlando Utilities Commission (OUC), this is a request for extension of time for providing a response to the FDEP Request for Additional Information (RAI) dated March 7, 2007. The subject of FDEP's RAI was an air construction permit application for emissions reductions and facility operations improvement projects at OUC's Curtis H. Stanton Energy Center, near Orlando. We had completed responses to all of the FDEP questions, but some recent decisions regarding future fuel use affected several of those responses, including all of emissions tables, and required additional analysis of future emissions. In fact, there will be the need to perform dispersion modeling and submit a revision to the air construction permit.

Because of these factors, we respectfully seek an extension of time totaling ninety (90) days to September 3, 2007. This will allow us ample time to complete all of the technical analyses, revise the permit application, and provide clear and concise responses to the RAI. Should you have any questions, please call Mike Soltys of Black & Veatch at 913-458-7563.

Salvatore Falcone
Black & Veatch Corporation
Phone & Fax = 913-458-3380
Email = falconesj@bv.com

- 6. Flyash/Blending Facility -- amendment request #10, originally submitted 2/2/07, received RAI 3/7/07. These improvements are proposed to allow the blending of Units 1 & 2 ashes with imported ashes to produce larger quantities of high quality, marketable, pozzolan grade fly ash (a non-cementitious additive to concrete that partially replaces cement and improves concrete durability and workability), and reduce quantities of fly ash going to the onsite landfill.
- 7. Petcoke & PRB Coal/Coal Handling/Blending -- amendment request #11, not currently pursued by OUC.
- 8. Fuel Tank Relocation -- amendment request #14, not yet submitted, may have small air emissions impact due to gasoline working and breathing losses.

Salvatore Falcone
Black & Veatch Corporation
Phone & Fax = 913-458-3380
Email = falconesi@bv.com

From: Soltys, J. Michael (Mike)

Sent: Wednesday, August 29, 2007 1:02 PM **To:** O'Neal, Brian D.; Hillman, Timothy M. **Cc:** Falcone, Salvatore J. (Sal); Rollins, Myron R.

Subject: FW: OUC-Stanton

fyi

Sal/Brian - Can you guys prepare the requested list?

From: Linero, Alvaro [mailto:Alvaro.Linero@dep.state.fl.us]

Sent: Wednesday, August 29, 2007 12:58 PM

To: Soltys, J. Michael (Mike)

Cc: Denise Stalls @ OUC; Lorraine Guise @OUC; Sheplak, Scott

Subject: RE: OUC-Stanton

Hello Mike:

I am passing this along to Scott Sheplak.

It may be time to make an updated list and discuss the changes we (Air) are reviewing.

Hope we aren't seeing holdups due to misunderstandings of what needs an air permit.

Hope the hold-up isn't trying to answer all question for all media simultaneously.

I recall when we had to act fast (like on the superheater bank replacement project) it was done in record time because of streamlined communication.

If we focus on the air permit changes then the job that the Siting Office has to do pursuant to those air permits becomes more routine.

We know that there are some changes that involve other media and do not involve air permitting.

Feel free to call.

You too Lorraine or Denise.

To: Falcone, Salvatore J. (Sal)

Cc: Denise Stalls @ OUC; Rollins, Myron R.; Soltys, J. Michael (Mike); O'Neal, Brian D.; Louis Brown @ OUC;

LGuise@ouc.com; Sheplak, Scott

Subject: RE: OUC-Stanton Air Permitting Changes

Thanks Sal.

We'll look this over and work on a schedule to get this done.

Sounds like forced oxidation is tops on your list followed by LNB/OFA.

I'm thinking the forced oxidation approval will look much like the DiBasic Acid and the LNB/OFA will need a BACT determination for CO.

Just let us know when you want to talk and we'll be ready. At worts, we might have to juggle a few things around but otherwise not especially loaded calendar.

Thanks.

Al Linero.

----Original Message-----

From: Falcone, Salvatore J. (Sal) [mailto:FalconeSJ@bv.com]

Sent: Fri 8/31/2007 5:36 PM

To: Linero, Alvaro

Cc: Denise Stalls @ OUC; Rollins, Myron R.; Soltys, J. Michael (Mike); O'Neal, Brian D.; Louis Brown @ OUC;

LGuise@ouc.com

Subject: OUC-Stanton Air Permitting Changes

Mr. Linero.

In response to your email to Mike Soltys (below), we have updated the list of air permitting issues, both resolved and pending. We feel it would be a good idea to call you to discuss these. If you can give me some available times next week (Sept 4-7), I will set up a conference call with you, OUC, and Black & Veatch. Please let me know what days and times look good.

Air Permitting-Related Projects in Site Certification Amendment Requests:

- 1. Neural Network -- The permit to install issued 1/10/07.
- 2. Dibasic Acid -- The permit to install issued 1/10/07.
- 3. Unit 1 Scrubber Upgrade, Phase 2 This was Amendment Request #5, originally submitted to DEP 12/14/06. Desired construction start date is March 2008. Phase 2 of the Scrubber Upgrade Project involves installation of a new distribution tray in conjunction with spray header modifications on the Unit 1 absorber modules. This modification is expected to reduce the operating costs of the Unit 1 flue gas desulfurization (FGD) system and improve its reliability. In addition, the modifications will provide flexibility to meet possible future sulfur dioxide reduction (SO₂) requirements and will increase flexibility in coal selection.
- 4. LowNOx Burners and Overfire Air -- amendment request #6, originally submitted to DEP 12/14/06. Desired construction start date is March 2008 for Unit 2 and October 2008 for Unit 1. The purpose of installing the Low NO_x Burners and Overfire Air System is to lower the level of NO_x emissions from Stanton Energy Center Units 1 and 2 while avoiding adverse effects to the boilers and the unit's performance/reliability.
- 5. Forced Oxidation -- amendment request #7, originally submitted 12/14/07 and ready for construction to begin in September. The function of the Forced Oxidation Air System is to provide the additional air needed to increase oxidation of the sulfite ions to sulfate within the scrubber slurry. The advantages of adding a forced oxidation system include the reduced FGD system maintenance through reduced scaling and plugging in the modules and improved byproduct solids handling properties due to higher quality.