




# Florida Department of Environmental Protection

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## Memorandum

TO: Joseph Kahn, Division of Air Resource Management  
THROUGH: Trina Vielhauer, Bureau of Air Regulation   
FROM: David Read and Al Linero, Special Projects Section  
DATE:    
May 13, 2010  
SUBJECT: Chem-Mod Fuel Coal Additive Test Burn  
Curtis H. Stanton Energy Center Units 1  
Project No. 0950137-033-AC  
Modification of Air Permit 0950137-028-AC

Attached for your approval and signature is a modification to extend the referenced permit expiration date from June 30, 2010 to July 30, 2010.

The original permit authorized a test burn to determine whether the Chem-Mod fuel additive reduces emissions of nitrogen oxides (NO<sub>x</sub>) from Units No. 1 and 2 and to allow operational issues when using the fuel additive to be assessed.

We recommend your approval and signature.

Attachments

TLV/aal/dr



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor  
Jeff Kottkamp  
Lt. Governor  
Michael W. Sole  
Secretary

May 14, 2010

*Electronically Sent – Received Receipt Requested.*

DStalls@ouc.com

Ms. Denise Stalls, Vice President  
Human and Environmental Resources  
Orlando Utilities Commission (OUC)  
500 South Orange Avenue  
Post Office Box 3193  
Orlando, Florida 32802

Re: DEP File No. 0950137-033-AC  
Chem-Mod Fuel Coal Additive Test Burn  
Curtis H. Stanton Energy Center Units 1 and 2

Dear Ms. Stalls:

On April 16, 2010, OUC requested additional time to conduct the Chem-Mod fuel coal additive test burn authorized by permit No. 0950137-028-AC on Units 1 and 2. The request is attached.

The permit authorizing the test burn was approved on December 28, 2009 and expires on June 30, 2010. Section 3, Condition 6 of the subject permit, requires that OUC complete the test within ninety (90) successive calendar days of when the fuel additive is initially applied to the coal. OUC requests that this requirement be modified to no more than ninety (90) days of fuel additive application to the coal. In addition, OUC requests the expiration date of the original permit be extended from June 30, 2010 to July 30, 2010.

Based on the circumstances and information provided, the Department approves this request.

#### **DETERMINATION:**

The permit is hereby modified as shown below in strikeout (~~strikeout~~) and underline format.

- The Cover Letter permit expiration date is modified as follows:

Permit Expires: ~~June~~ July 30, 2010

- Section 3 – Emissions Units Specific Conditions, Condition 6 is modified as follows:

6. Test Duration: The permittee shall complete the test by July 30, 2010 ~~within ninety (90) successive calendar days of when the fuel additive is initially applied to the coal.~~

[Application No. 0950137-028-AC; Rule 62-210.200(PTE), F.A.C. and Rule 62-4.070(3), F.A.C.]

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Department of

Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241 / Facsimile: 850/245-2303). Petitions must be filed within 14 days of receipt of this permit extension. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**Effective Date:** This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Department.

**Judicial Review:** Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., 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.



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Joseph Kahn, Director  
Division of Air Resource Management

JK/tlv/aal/dr  
Enclosures


**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Air Construction Permit Modification 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 5/17/10 to the persons listed below.

- Jan C. Aspuru, OUC: [jaspuru@ouc.com](mailto:jaspuru@ouc.com)
- Scott Osbourn, P.E., Golder Associates: [scott\\_osbourn@golder.com](mailto:scott_osbourn@golder.com)
- Caroline Shine, DEP CD: [caroline.shine@dep.state.fl.us](mailto:caroline.shine@dep.state.fl.us)
- Lori Cunniff, Orange County EPD: [lori.cunniff@ocfl.net](mailto:lori.cunniff@ocfl.net)
- Vickie Gibson, DEP BAR Reading File: [victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@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.



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(Clerk)

5/17/10  
(Date)

## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Monday, May 17, 2010 11:29 AM  
**To:** 'jaspuru@ouc.com'  
**Cc:** 'scott\_osbourn@older.com'; Shine, Caroline; 'lori.cunniff@ocfl.net'; Gibson, Victoria; Read, David; Walker, Elizabeth (AIR)  
**Subject:** Orlando Utilities Commission - Stanton Energy Center; 0950137-033-AC - Extension  
**Attachments:** 0950137-033-AC Final.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

**Click on the following link to access the permit project documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0950137.033.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950137.033.AC.F_pdf.zip)

**Owner/Company Name:** ORLANDO UTILITIES COMMISSION

**Facility Name:** STANTON ENERGY CENTER

**Project Number:** 0950137-033-AC

**Permit Status:** FINAL

**Permit Activity:** CONSTRUCTION/ Extension

**Facility County:** ORANGE

**Processor:** David Read

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. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

Note: The attached 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>>.

## Livingston, Sylvia

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**From:** Stalls, Denise M. [DStalls@ouc.com]  
**Sent:** Monday, May 17, 2010 12:22 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: Orlando Utilities Commission - Stanton Energy Center; 0950137-033-AC - Extension

received

### DISCLAIMER:

Florida has a very broad public records law. As a result, any written communication created or received by Orlando Utilities Commission officials and employees will be made available to the public and media, upon request, unless otherwise exempt. Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this office. Instead, contact our office by phone or in writing.

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Monday, May 17, 2010 11:37 AM  
**To:** Stalls, Denise M.  
**Cc:** Read, David; Walker, Elizabeth (AIR)  
**Subject:** Orlando Utilities Commission - Stanton Energy Center; 0950137-033-AC - Extension

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

**Click on the following link to access the permit project documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0950137.033.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950137.033.AC.F_pdf.zip)

**Owner/Company Name:** ORLANDO UTILITIES COMMISSION  
**Facility Name:** STANTON ENERGY CENTER  
**Project Number:** 0950137-033-AC  
**Permit Status:** FINAL  
**Permit Activity:** CONSTRUCTION/ Extension  
**Facility County:** ORANGE  
**Processor:** David Read

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Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any

## Livingston, Sylvia

---

**From:** Osbourn, Scott [Scott\_Osbourn@golder.com]  
**To:** Livingston, Sylvia  
**Sent:** Monday, May 17, 2010 11:31 AM  
**Subject:** Read: Orlando Utilities Commission - Stanton Energy Center; 0950137-033-AC - Extension

Your message was read on Monday, May 17, 2010 11:31:03 AM (GMT-05:00) Eastern Time (US & Canada).

**Walker, Elizabeth (AIR)**

*Application -*

*6950137-033-AC*

**From:** Linero, Alvaro  
**Sent:** Monday, May 03, 2010 9:09 AM  
**To:** Walker, Elizabeth (AIR); Vielhauer, Trina  
**Subject:** OUC- Stanton Energy Center Permit 0950137-028-AC SEC Units 1 and 2 Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project  
**Attachments:** 1995\_001.pdf  
**Importance:** High

Elizabeth.

Did you ever see a hardcopy of this.

Trina.

Would a letter request by email suffice for this kind of non-controversial extension request?

Thanks.

Al.

---

**From:** Baez, David R. [mailto:DBaez@ouc.com]  
**Sent:** Friday, April 16, 2010 5:13 PM  
**To:** Read, David  
**Cc:** Linero, Alvaro; Blair, Garfield; Stalls, Denise M.  
**Subject:** OUC- Stanton Energy Center Permit 0950137-028-AC SEC Units 1 and 2 Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project  
**Importance:** High

Mr. Read,

Please see below and attached a petition for time extension regarding the subject permit as discussed via email earlier.

If you have any questions, please do not hesitate to contact me.

Regards,

David R. Báez  
Project Engineer, Environmental Affairs  
Orlando Utilities Commission  
407-658-6444 x.3691 (office)  
407-719-6515 (cell)  
407-244-8794 (fax)  
[dbaez@ouc.com](mailto:dbaez@ouc.com)

Via E-Mail

April 16, 2010



Mr. David Read, Engineering Specialist II  
Special Projects Section, Bureau of Air Regulation  
Division of Air Resources Management  
Florida Dept. of Environmental Protection  
2600 Blair Stone Road MS 5500

Tallahassee, Florida 32399-2400

Dear Mr. Read:

Subject: OUC- Stanton Energy Center Permit 0950137-028-AC  
SEC Units 1 and 2  
Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project

The Florida Department of Environmental Protection granted the Orlando Utilities Commission construction permit 0950137-028-AC in order to test the efficacy of a coal additive for flue gas NOx concentration reduction.

The permit was approved by the FDEP on December 28, 2009 and expires June 30, 2010.

Section 3, condition 6 of the subject permit, requires that OUC complete the test within ninety (90) successive calendar days of when the fuel additive is initially applied to the coal.

OUC applied the fuel additive for the first time December 29, 2009, and then conducted two test applications on January 21-22, 2010 and February 20-26 2010 respectively.

The modified fuel has only been burned on Unit 1. Unit 1 went on a turbine outage starting on February 26, 2010 and is expected to return to operations on May 3rd 2010.

In order to complete a better rounded test, OUC would like to apply the fuel additive and burn the modified fuel for a longer period, once Unit 1 returns from the outage.

OUC requests that specific condition 6, of section 3 of the subject permit, and the permit expiration date be modified to allow for a longer period of testing. The suggested wording is "Test Duration: The test shall be limited to no more than ninety (90) days of fuel additive application to the coal." The permit expiration date extension requested is to July 30<sup>th</sup>, 2010. These modifications would allow OUC to complete a better representative test of the Chem-mod fuel additive performance.

Sincerely,  
Denise M. Stalls, Vice President  
Human and Environmental Resources

cc: Al Linero, FDEP  
David R. Baez, OUC  
Garfield Blair, OUC

<<1995\_001.pdf>>

addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this office. Instead, contact our office by phone or in writing.

---

**Walker, Elizabeth (AIR)**

---

**From:** Linero, Alvaro  
**Sent:** Monday, May 03, 2010 9:55 AM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** FW: OUC- Stanton Energy Center Permit 0950137-028-AC SEC Units 1 and 2 Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project

---

**From:** Linero, Alvaro  
**Sent:** Monday, May 03, 2010 9:07 AM  
**To:** 'Baez, David R.'  
**Subject:** RE: OUC- Stanton Energy Center Permit 0950137-028-AC SEC Units 1 and 2 Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project

David.

Did you ever send a physical copy of this application.

Al Linero.

---

**From:** Baez, David R. [mailto:DBaez@ouc.com]  
**Sent:** Friday, April 16, 2010 5:13 PM  
**To:** Read, David  
**Cc:** Linero, Alvaro; Blair, Garfield; Stalls, Denise M.  
**Subject:** OUC- Stanton Energy Center Permit 0950137-028-AC SEC Units 1 and 2 Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project  
**Importance:** High

Mr. Read,

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If you have any questions, please do not hesitate to contact me.

Regards,

David R. Báez  
Project Engineer, Environmental Affairs  
Orlando Utilities Commission  
407-658-6444 x.3691 (office)  
407-719-6515 (cell)  
407-244-8794 (fax)  
[dbaez@ouc.com](mailto:dbaez@ouc.com)

Via E-Mail

April 16, 2010

Mr. David Read, Engineering Specialist II  
Special Projects Section, Bureau of Air Regulation  
Division of Air Resources Management  
Florida Dept. of Environmental Protection  
2600 Blair Stone Road MS 5500

Tallahassee, Florida 32399-2400

Dear Mr .Read:

Subject: OUC- Stanton Energy Center Permit 0950137-028-AC  
SEC Units 1 and 2  
Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project

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OUC applied the fuel additive for the first time December 29, 2009, and then conducted two test applications on January 21-22, 2010 and February 20-26 2010 respectively.

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Sincerely,  
Denise M. Stalls, Vice President  
Human and Environmental Resources

cc: Al Linero, FDEP  
David R. Baez, OUC  
Garfield Blair, OUC

<<1995\_001.pdf>>

## Walker, Elizabeth (AIR)

---

**From:** Linero, Alvaro  
**Sent:** Monday, May 03, 2010 9:34 AM  
**To:** Vielhauer, Trina  
**Cc:** Walker, Elizabeth (AIR)  
**Subject:** RE: OUC- Stanton Energy Center Permit 0950137-028-AC SEC Units 1 and 2 Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project

Do you want them to nevertheless send a hardcopy of request and should we start clock from date of email receipt?

---

**From:** Vielhauer, Trina  
**Sent:** Monday, May 03, 2010 9:14 AM  
**To:** Linero, Alvaro; Walker, Elizabeth (AIR)  
**Subject:** RE: OUC- Stanton Energy Center Permit 0950137-028-AC SEC Units 1 and 2 Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project

I haven't seen electronic or hard copy. I think the letter request is fine.

---

**From:** Linero, Alvaro  
**Sent:** Monday, May 03, 2010 9:09 AM  
**To:** Walker, Elizabeth (AIR); Vielhauer, Trina  
**Subject:** OUC- Stanton Energy Center Permit 0950137-028-AC SEC Units 1 and 2 Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project  
**Importance:** High

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**Sent:** Friday, April 16, 2010 5:13 PM  
**To:** Read, David  
**Cc:** Linero, Alvaro; Blair, Garfield; Stalls, Denise M.  
**Subject:** OUC- Stanton Energy Center Permit 0950137-028-AC SEC Units 1 and 2 Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project  
**Importance:** High

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Regards,

David R. Báez  
Project Engineer, Environmental Affairs  
Orlando Utilities Commission  
407-658-6444 x.3691 (office)  
407-719-6515 (cell)  
407-244-8794 (fax)  
[dbaez@ouc.com](mailto:dbaez@ouc.com)

Via E-Mail

April 16, 2010

Mr. David Read, Engineering Specialist II  
Special Projects Section, Bureau of Air Regulation  
Division of Air Resources Management  
Florida Dept. of Environmental Protection  
2600 Blair Stone Road MS 5500

Tallahassee, Florida 32399-2400

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Sincerely,  
Denise M. Stalls, Vice President  
Human and Environmental Resources

cc: Al Linero, FDEP  
David R. Baez, OUC  
Garfield Blair, OUC

<<1995\_001.pdf>>

*[Faint, illegible text, possibly a signature or header]*

**Walker, Elizabeth (AIR)**

---

**From:** Linero, Alvaro  
**Sent:** Monday, May 10, 2010 3:02 PM  
**To:** Walker, Elizabeth (AIR); Read, David  
**Subject:** FW: OUC- Stanton Energy Center Permit 0950137-028-AC SEC Units 1 and 2 Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project  
**Attachments:** 1995\_001.pdf  
**Importance:** High  
**Follow Up Flag:** Follow up  
**Due By:** Tuesday, May 11, 2010 12:00 PM  
**Flag Status:** Completed

I discussed w/ applicant.

Go ahead and log this effective April 16 and assign to David Read.

We won't make a habit of these emailed letter requests.

A.A. Linero, P.E., Program Administrator  
Florida Department of Environmental Protection  
Bureau of Air Regulation/Special Projects Section  
1-850-921-9523

---

**From:** Baez, David R. [DBaez@ouc.com]  
**Sent:** Friday, April 16, 2010 5:12 PM  
**To:** Read, David  
**Cc:** Linero, Alvaro; Blair, Garfield; Stalls, Denise M.  
**Subject:** OUC- Stanton Energy Center Permit 0950137-028-AC SEC Units 1 and 2 Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project

Mr. Read,  
Please see below and attached a petition for time extension regarding the subject permit as discussed via email earlier.  
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Regards,  
David R. Báez  
Project Engineer, Environmental Affairs  
Orlando Utilities Commission  
407-658-6444 x.3691 (office)  
407-719-6515 (cell)  
407-244-8794 (fax)  
[dbaez@ouc.com](mailto:dbaez@ouc.com)

Via E-Mail  
April 16, 2010

Mr. David Read. Engineering Specialist II  
Special Projects Section, Bureau of Air Regulation  
Division of Air Resources Management  
Florida Dept. of Environmental Protection  
2600 Blair Stone Road MS 5500  
Tallahassee, Florida 32399-2400  
Dear Mr .Read:



Subject: OUC- Stanton Energy Center Permit 0950137-028-AC

SEC Units 1 and 2

Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project

The Florida Department of Environmental Protection granted the Orlando Utilities Commission construction permit 0950137-028-AC in order to test the efficacy of a coal additive for flue gas NOx concentration reduction.

The permit was approved by the FDEP on December 28, 2009 and expires June 30, 2010.

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In order to complete a better rounded test, OUC would like to apply the fuel additive and burn the modified fuel for a longer period, once Unit 1 returns from the outage.

OUC requests that specific condition 6, of section 3 of the subject permit, and the permit expiration date be modified to allow for a longer period of testing. The suggested wording is "Test Duration: The test shall be limited to no more than ninety (90) days of fuel additive application to the coal." The permit expiration date extension requested is to July 30<sup>th</sup>, 2010. These modifications would allow OUC to complete a better representative test of the Chem-mod fuel additive performance.

Sincerely,

Denise M. Stalls, Vice President

Human and Environmental Resources

cc: Al Linero, FDEP

David R. Baez, OUC

Garfield Blair, OUC

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Orlando Utilities Commission  
500 South Orange Avenue  
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Via E-Mail

April 16, 2010

Mr. David Read, Engineering Specialist II  
Special Projects Section, Bureau of Air Regulation  
Division of Air Resources Management  
Florida Dept. of Environmental Protection  
2600 Blair Stone Road MS 5500  
Tallahassee, Florida 32399-2400

Dear Mr. Read:

Subject OUC- Stanton Energy Center Permit 0950137-028-AC  
SEC Units 1 and 2  
Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project

The Florida Department of Environmental Protection granted the Orlando Utilities Commission construction permit 0950137-028-AC in order to test the efficacy of a coal additive for flue gas NOx concentration reduction.

The permit was approved by the FDEP on December 28, 2009 and expires June 30, 2010.

Section 3, condition 6 of the subject permit, requires that OUC complete the test within ninety (90) successive calendar days of when the fuel additive is initially applied to the coal.

OUC applied the fuel additive for the first time December 29, 2009, and then conducted two test applications on January 21-22, 2010 and February 20-26 2010 respectively.

The modified fuel has only been burned on Unit 1. Unit 1 went on a turbine outage starting on February 26, 2010 and is expected to return to operations on May 3rd 2010.

In order to complete a better rounded test, OUC would like to apply the fuel additive and burn the modified fuel for a longer period, once Unit 1 returns from the outage.

OUC requests that specific condition 6, of section 3 of the subject permit, and the permit expiration date be modified to allow for a longer period of testing. The suggested wording is "Test Duration: The test shall be limited to no more than ninety (90) days of fuel additive application to the coal." The permit expiration date extension requested is to July 30<sup>th</sup>, 2010. These modifications would allow OUC to complete a better representative test of the Chem-mod fuel additive performance.

Sincerely,

Denise M. Stalls, Vice President  
Human and Environmental Resources

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