

Orlando Utilities Commission
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October 11, 2007
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Ms. Trina Vielhauer, Bureau Chief
Bureau of Air Regulations
Florida Department of Environmental Protection
2600 Blair Stone Road, Mail Station 5505
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

Re: Dow Chemical COVOL 298-1

Dear Ms. Vielhauer:

In 2001, Orlando Utilities Commission's (OUC) coal suppliers requested the use of a "dust suppression" binder for use for future coal deliveries. Dow Chemical COVOL 298-1 would be added to coal supply prior to loading the coal trains.


In August 2001, OUC received recognition from the Department that Dow Chemical COVOL 298-1 met the classification of "chemical dust suppression" authorized by our Title V permit and could be used on coal deliveries to the Stanton Energy Center, as long as the product was applied off site.

The determination by the Department also requires OUC to notify the Department and receive concurrence prior to the use of an alternative chemical dust suppressant. Our coal suppliers recently notified OUC that there is a shortage of COVOL 298-1. They have requested the substitution to dust suppression binder COVOL 298 which is readily available. Correspondence to the Department from 2001 and MSDS sheets for both products are attached for your reference.

OUC requests concurrence from the Department that dust suppression COVOL 298 meets the classification of "chemical dust suppression" and is allowed for use by our coal suppliers with application to the coal off site.

We anticipate the need to begin to receive this material in the near future. We appreciate a timely response to this request. If you require further information, please contact me directly at 407-737-4236 or dstalls@ouc.com.

Sincerely,


Denise M. Stalls
Vice President
Environmental Affairs

DMS:rc
Enclosures

Providing innovative, friendly, dependable service.