

Department of Environmental Protection

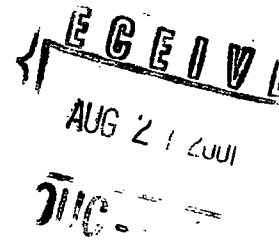
Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

August 23, 2001

Ms. Denise M. Stalls
Director, Environmental Affairs
Orlando Utilities Commission
P.O. Box 3193
Orlando, Florida 32802



Re: Recognition of Dow Chemical's COVOL 298-1 as a Coal Dust Suppressant
Stanton Energy Center, Facility ID #: 0950137

Dear Ms. Stalls:


We have received your request to begin using Dow Chemical's COVOL 298-1 on your coal as a means of suppressing fugitive dust.

It is our opinion that this particular material falls within the classification of "chemical dust suppressant" that is authorized by your Title V permit (see Appendix TV-3, condition 57.). For inspection purposes, please retain on-site a copy of the material safety data sheet (MSDS), a copy of your contract with the coal supplier specifying the material that will be applied to your coal, and a certification from the supplier accompanying each delivery that attests that this is the only material that has been applied to your coal. If OUC, or the supplier, desires to use a different material, you must inform the Department and receive concurrence prior to combusting the new product. It should be noted that this approval is only valid if the COVOL 298-1 is not applied to the coal on-site. Should you wish to apply this product to your coal on-site, a construction permit application detailing the increase in VOC/HAP emissions must first be submitted for processing.

Under the provisions of Rule 62-297.310(7)(b), F.A.C., if, at any time, the Department has reason to believe that any of your emission limits are not being met (i.e. increased particulate matter, etc.), it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

Should you have any questions regarding this matter, please contact Jonathan Holtom, P.E., at (850) 921-9531, or write to me at the above letterhead address.

Sincerely,


C.H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/jh

cc: Mr. Buck Oven, P.E., DEP
Mr. Len Kozlov, P.E., DEP-CE
Ms. Marie Driscoll, OCEPC

"More Protection, Less Process"

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