

TO: H. S. Oven
THRU: Clair Fancy
FROM: Ed Palagyi
DATE: November 13, 1981
SUBJ: Orlando Utilities Commission (OUC)

The following comments are replies to the questions Mr. B. E. Skoup asked in his letter to you on October 29, 1981. The questions asked pertain to the BACT determination of August 28, 1981 for the Curtis H. Stanton Energy Center.

The replies are in numeric sequence with the questions asked.

1. The applicant (OUC) requests the BACT determination for unit No. 1 also apply to unit No. 2, subject to later re-evaluation. Unit No. 2 is scheduled to commence construction in July 1990.

A rule pertaining to phased construction projects in a nonattainment area reads as follows:

"For phased construction projects, the determination of LAER shall be reviewed and modified as appropriate at the latest, reasonable time prior to commencement of each independent phase of construction of the proposed facility or modification". 17-2.17(3)(b)1.e. FAC.

The rule applies to LAER (Lowest Achievable Emission Rate) determinations, but the intent of this rule would also apply to BACT. The BACT review group did not think eight years is the latest, reasonable time prior to construction of unit No. 2.

Improved state-of-the-art environmental control technology and cleaner combustion processes may be necessary to ameliorate air pollution problems due to the increased use of coal. Flue gas desulfurization, coal cleaning, and fluidized bed combustion could be the technologies in 1990. A cost effective method to control NO_x emissions may also be available in 1990.

The BACT review group believes it would be better not to recommend a BACT for the No. 2 unit at this time. The applicant can monitor the development of air pollution control technology and ambient air quality, then structure their investments accordingly. Why a BACT for unit No. 2 is required at this time needs to be more clearly defined.?

2. The date of receipt of the BACT application is indicated on Page 2 of the determination is the date the BACT coordinator received the information. This date does not affect any time scheduled (clock) for site certification or permitting.

3. The applicant has indicated a worst case coal analysis of 4.46% sulfur content with a heat content of 10,813 Btu per pound. The emission limit for SO₂ determined as BACT was 0.76 pounds per million Btu heat input. The applicant contends this SO₂ limit removes two coal sources from the 38 available for use. Based upon AP-42 emission factors the SO₂ emission limit for the worst coal would be 0.78 pound per million Btu.

The review group does not believe the difference of 0.02 lb/million Btu on a 30-day rolling average will result

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in the applicant being denied coal purchase flexibility. The SO₂ emission limit determined as BACT agrees with Department determinations for JEA and TECO.

4. The applicant objects to the CO emission limit of 0.05 pounds per million Btu on the basis the actual CO emissions are currently unknown. The BACT review group recognizes that combustion control requirements must be a balanced trade-off between NO_x and CO emissions through the use of a flue gas oxygen monitor. The review group also points out that actual emissions for all the pollutants are currently unknown but are estimated from AP-42 and/or from actual similar source test results.

The review group recommends the BACT CO emissions limit be equal to the limit in the Federal Prevention of Significant Deterioration (PSD) determination.

5. This was a statement not requiring a response.

6. The applicant has requested the visible emissions (VE) limitation of 5% opacity for coal, limestone, and flyash handling systems be changed to 20% opacity. The 5% opacity or no visible emission limitation is attainable using available technology. The review group recommends the 5% opacity limit be retained.

7. This was a statement not requiring a response.

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO.

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

INITIAL

DATE

2.

INITIAL

DATE

3.

INITIAL

DATE

4.

INITIAL

DATE

REMARKS:

BOB:

Do you have anything to add or comments to make???

Agree 11/17/81

INFORMATION

REVIEW & RETURN

REVIEW & FILE

INITIAL & FORWARD

DISPOSITION

REVIEW & RESPOND

PREPARE RESPONSE

FOR MY SIGNATURE

FOR YOUR SIGNATURE

LET'S DISCUSS

SET UP MEETING

INVESTIGATE & REPT

INITIAL & FORWARD

DISTRIBUTE

CONCURRENCE

FOR PROCESSING

INITIAL & RETURN

FROM:

Ed Palagyi

DATE

11-13-81

PHONE