

Orlando Utilities Commission  
500 South Orange Avenue  
P.O. Box 3193  
Orlando, Florida 32802  
Phone: 407.423.9100  
Administrative Fax: 407.236.9616  
Purchasing Fax: 407.384.4141  
Website: www.ouc.com

RECEIVED

JAN 27 1999

BUREAU OF  
AIR REGULATION



The *Reliable* One

January 25, 1999

Mr. Mike Halpin  
Florida Department of Environmental Protection  
Division of Air Resources Management  
Mail Station No. 5505  
2600 Blairstone Road  
Tallahassee, FL 32399-2400

Re: Stanton Energy Center - Title V Permit

Dear Mr. Halpin:

I have reviewed the SEC Title V Permit with Denise Scarlett and have identified the following minor inconsistencies within the permit which should be corrected prior to the issuance of the final permit.

- Page 2      Subsection A - the nameplate rating for both SEC-1 and SEC-2 should be 468MW.
- Page 6      Section III - Subsection A - nominal megawatt number for both units should be 468 MW and the maximum heat input for SEC 1 was changed to 4286 MMBTU in the modification to the conditions of certification granted in December 1998.
- Page 8      A.9. - Unit 1 has SO<sub>2</sub> limits of 1.2 lb/MMBTU 30 day rolling average; 1.2 lb/MMBTU 2 hour average as well as the 1.14 lb/MMBTU standard listed.
- Page 20     Subsection B - B.3 - the limit of 150 hour of hour of operation for the auxiliary boiler is acceptable as written.
- Table 2-1   Neither SEC-1 or SEC 2 have or are required to have a CMS for particulate.

If you have any questions, please call me at 407/423-9133.

Very truly yours,

Robert F. Hicks  
Sr. Environmental Engineer

RFH:rc

xc: A. C. Frazier  
D. M. Scarlett

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# Just the fax . . . . .

Date: 3/31/99 Time Sent: \_\_\_\_\_ Total Number of Pages: 10

Send to: Name MIKE HALPIN

Company FDEP

Fax Number 850/922-6979

From: Name BOB HICKS Tel. Number <sup>407</sup>~~800~~/423-9133

Comments: Mike -

Sorry, I believe this is the mod you need - If have any question, please call me at 407/423-9133

Bob

If there are any problems with receiving this fax, please call (407) 423-9100, ext. 2057.

Orlando Utilities Commission  
P.O. Box 3193  
Orlando, FL 32802



The Reliable One

Phone Number: (407) 423-9100

Fax Number: (407) 236-9616

**BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

In Re: Orlando Utilities Commission	)	
Stanton Energy Center	)	DEP CASE NOS. PA 81-14C & PA 81-14SA
Modification of Conditions	)	
of Certification	)	OGC CASE NOS. 81-0145 & 91-0769
Orange County, Florida	)	

**FINAL ORDER MODIFYING  
CONDITIONS OF CERTIFICATION**

On December 14, 1982, the Governor and Cabinet, sitting as the Siting Board, issued a final order approving certification for the Orlando Utilities Commission (OUC) Stanton Energy Center Unit 1. On December 17, 1991, the Siting Board issued a final order approving certification for the OUC Stanton Energy Center Unit 2. Those certification orders approved the construction and operation of two 465 MW (net) coal fired units and associated facilities in Orange County, Florida.

On September 20, 1997, OUC filed a request to modify the Stanton Energy Center Site. On November 13, 1997, OUC filed additional information relating to their request to amend the conditions of certification pursuant to Section 403.516(1)(b), Florida Statutes. OUC requested that the conditions be modified to allow the use of landfill gas as a fuel, use of offsite fly ash combined with lime to replace onsite produced fly ash in the Flue Gas Desulfurization (FGD) process, use of onsite used oil in Units 1 and 2, a modification process for federally delegated permits, a relocation of the fleet maintenance facility, clarification of applicable federal New Source Performance Standard Regulations, and clarification of heat input numbers.

Copies of OUC's proposed modifications were made available for public review. On October 17, 1997, a Proposed Modification of Power Plant Certification was published in the Florida Administrative Weekly. As of September 30, 1997, all parties to the original proceeding had received copies of OUC's request to modify. The notice specified that a hearing would be held if a party to the original certification hearing objected within 45 days from receipt of the proposed modifications or any other affected person objected in writing within 30 days after issuance of the public notice. No written objection to the proposed modifications has been received by the Department. Accordingly, in the absence of any timely objection,

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**IT IS ORDERED:**

The proposed changes to the OUC Stanton Energy Center Units 1 and 2 relating to use of landfill gas, used oil, purchased fly ash, and other clarifications as described in the September 20 1997, requests for modification are **APPROVED**. Pursuant to Section 403.516(1)(b), F.S., the Department **HEREBY** modifies the conditions of certification for the Stanton Energy Center as follows:

**I. Air**

The construction and operation of Units 1 & 2 at Orlando Utilities Commission, Curtis H. Stanton Energy Center (CHSEC) steam electric power plant site shall be in accordance with all applicable provisions of Chapters ~~17-2, 17-4, and 17-5~~ 62, Florida Administrative Code except for opacity, NO<sub>x</sub>, and SO<sub>2</sub>, which shall be governed by 40 CFR Part 60 regarding startup, shutdown, and malfunction. In addition to the foregoing, the permittee shall comply with the following conditions of certification:

**A. Emissions Limitations**

1. The proposed steam generating station shall be constructed and operated in accordance with the capabilities and specifications of the application including for Unit 1, a the proposed ~~465~~ 474 (gross), and Unit 2, a 474 (gross) megawatt generating capacity and the ~~4136~~ 4286 MMBtu/hr heat input rate for each steam generator. For the purpose of calculating mass stack emissions, based on a maximum heat input of 4136 million Btu per hour, stack emissions from CHSEC Unit 1 shall not exceed the following when burning coal:
  - a. SO<sub>2</sub> - 1.2 lb. per million BTU per heat input, maximum two hour average, and 1.14 lb/MMBtu maximum three hour average;
  - b. NO<sub>x</sub> - 0.60 lb. per million Btu heat input, 30 day rolling average;
  - c. Particulates - 0.03 lb. per million Btu heat input, 124.1 lb. per hour;
  - d. Visible emissions - 20% opacity (6 minute average, except one 6 - minute period per hour of not more than 27% opacity).
2. Based on a maximum heat input of 4286 million Btu per hour, stack emissions from Unit 2 shall not exceed the following when burning coal:
  - a. SO<sub>2</sub> -lb/million Btu heat input

30 - day rolling average	0.25
24 - hour emission rate	0.67
3 - hour mission rate	0.85
  - b. NO<sub>x</sub> -lb/million Btu heat input

30 day rolling average	0.17
------------------------	------

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c. **PM/PM<sub>10</sub> -lb/million Btu heat input**

	lb/MMBtu	lb/hr
PM	0.02	85.7
PM <sub>10</sub>	0.02	85.7

d. **CO - 0.15 lb/million Btu heat input, 643 lb/hour;**

e. **VOC - 0.015 lb/million Btu heat input, 64 lb/hour;**

f. **H<sub>2</sub>SO<sub>4</sub> - 0.033 lb/million Btu heat input 140 lb/hour;**

g. **Be - 5.2 x 10<sup>-6</sup> lb/million Btu heat input, 0.022 lb/hour;**

h. **Hg -1.1 x 10<sup>-5</sup> lb/million Btu heat input, 0.046 lb/hour;**

i. **Pb -1.5 x 10<sup>-4</sup> lbs/million Btu heat input, 0.64 lb/hour;**

j. **Fluorides -4.2 x 10<sup>-4</sup> lb/million Btu heat input, 1.8 lb/hour.**

23. The height of the boiler exhaust stacks for CHSEC Units 1 & 2 shall not be less than 550 ft. above grade.

34. Particulate emissions from the coal, lime and limestone handling facilities:

a. All conveyors and conveyor transfer points will be enclosed to preclude PM emissions (except those directly associated with the coal stacker/reclaimer or emergency stockout, and the limestone stockout for which enclosure is operationally infeasible). All coal and limestone conveyors not underground or within buildings will be enclosed (roof and sides) with steel grating or concrete floors (except the stacker/reclaimer which will have windscreen protection);

b. Inactive coal storage piles will be shaped, compacted and oriented to minimize wind erosion;

c. Water sprays or chemical wetting agents and sterilizers will be applied to storage piles, handling equipment, etc., during dry periods and as necessary to all facilities to maintain an opacity of less than or equal to 5 percent, except when adding, moving or removing coal from the coal pile, which would be allowed no more than 20%;

d. The limestone handling receiver hopper will be equipped with water spray dust control facilities. Limestone conveyors not underground or within buildings will be enclosed with open grating floors (except where concrete floors are provided over roads or other facilities). Limestone day silos and associated transfer points will be maintained at negative pressures during filling operations with the exhaust vented to a control system. Lime will be handled with a totally enclosed pneumatic system. Exhaust from the lime silos during filling will be vented to a collector system;

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e. The fly ash handling system (including transfer and silo storage) will be totally enclosed and vented (including pneumatic system exhaust) through fabric filters; and

f. The permittee must submit to the Department within thirty (30) days after it becomes available, copies of technical data pertaining to the selected particulate control for the coal, lime and limestone handling facilities. These data should include, but not be limited to, guaranteed efficiency and emission rates, and major design parameters such as air/cloth ratio and flow rate. The Department may, upon review of these data, disapprove the use of any such device if the Department determines the selected control devices to be inadequate to meet the emission limits specified in 4 5 below. Such disapproval shall be issued within 30 days of receipt of the technical data. Any additional coal, lime, and limestone handling facilities for Stanton Unit 2 will be equipped with particulate control systems equivalent to those for Stanton Unit 1.

45. Particulate emissions from bag filter exhausts from the following facilities shall be limited to 0.02 gr/acf: coal, lime, limestone and flyash handling systems excluding those facilities covered by II/LA.3.c. above. A visible emission reading of 5% opacity or less may be used to establish compliance with this emission limit. A visible emission reading greater than 5% opacity will not create a presumption that the 0.02 gr/acf emission limit is being violated. However, a visible emission reading greater than 5% opacity will require the permittee to perform a stack test for particulate emissions, as set forth in Condition I.C.

56. Compliance with opacity limits of the facilities listed in Condition II/LA. will be determined by EPA referenced method 9 (Appendix A, 40 CFR 60).

67. Construction shall reasonably conform to the plans and schedule given in the original application or the supplemental application.

78. The permittee shall report any delays in construction and completion of the project which would delay commercial operation by more than 90 days to the DEP Central District Office in Orlando.

89. Reasonable precautions to prevent fugitive particulate emissions during construction shall be to coat the roads and construction sites used by contractors, and to regrass or water areas of disturbed soils.

910. Coal shall not be burned in the unit unless the electrostatic precipitator and limestone scrubber and other air pollution control devices are operating as designed except as provided under 40 CFR Part 60, Subpart Da.

**BEST AVAILABLE COPY**

1011. Except as noted herein, The fuel oil to be fired in Stanton Units 1 and 2 and the auxiliary boiler shall be primarily "new oil" which means an oil which has been refined from crude oil and has not been used. On-site generated lubricating oil and used fuel oil which meets the requirements of 40 CFR 266.40 may also be burned. The quality of the No. 2 fuel oil used by the auxiliary boiler shall not contain more than 0.5% sulfur by weight and cause the allowable emission limits listed in the following table to be exceeded. Such emissions may be calculated in accordance with AP-42.

a. The quality of the No. 2 fuel oil used by the auxiliary boiler shall not cause the allowable emission limits listed in the following table to be exceeded. Such emissions may be calculated in accordance with AP-42.

Allowable Emission Limits

<u>Pollutant</u>	<u>lb/MMBtu</u>
PM	0.015
SO <sub>2</sub>	0.51
NO <sub>x</sub>	0.16
Visible emissions	Maximum 20% Opacity

b. Landfill gas from the Orange County Landfill may be burned in Unit No. 1 and Unit No. 2 to the extent that quantities are available provided that all emission limits contained in condition I.A.1. are met.

c. Natural gas as supplied by commercial pipeline may be burned in Unit No. 1 and Unit No. 2 to the extent that quantities are available provided that all emission limits contained in Condition I.A.1. are met.

B. No change.

C. Stack Testing

1-3. No change.

4. Stack tests for particulates, NO<sub>x</sub> and SO<sub>2</sub> and visible emissions shall be performed annually in accordance with Conditions C.2 and -3 above.

**XXVI.(Unit 1) Modification of Conditions**

The conditions of this certification may be modified in the following manner:

A. The Board pursuant to 403.516(1), F.S., hereby delegates to the Secretary the authority to modify, after notice and opportunity for hearing, and conditions pertaining to consumptive use of water, monitoring, sampling, groundwater, mixing zones, zones of discharge, leachate control programs, effluent or emission standards or limitations, variances or exceptions to water quality standards, specification of control equipment, related time schedules, railroad spur, transmission lines, access roads, or pipeline construction, mitigation, transfer or assignment of the certification or related federally delegated permits, and source of treated effluent cooling

water, or any special studies conducted as necessary to obtain the objectives of Chapter 403, Florida Statutes, which are not in conflict with the Conditions of Certification in Part VII.

B. This certification shall be automatically modified to conform to any subsequent amendments, modifications, or renewals made by DEP to any separately issued Prevention of Significant Deterioration (PSD) permit, Title V Air Permit, or National Pollutant Discharge Elimination System (NPDES) permit for the facility under any federally delegated or approved program. OUC shall send each party to the original certification proceedings (at the party's last known address as shown in the record of the proceedings) notice of requests for modifications or renewals to the applicable federal permit if the request involves a relief mechanism (e.g. mixing zone, variance, alternate emission or discharge standard, etc.) from standards. DEP shall notify all parties to the certification proceedings of any intent to modify conditions under this section prior to taking final agency action.

C. All other modifications shall be made in accordance with Sections 403.516, Florida Statutes.

#### I/XXI (Unit 2) Modification of Conditions

The conditions of this certification may be modified in the following manner:

A. Pursuant to Subsection 403.516(1), F.S., the Board hereby delegates the authority to the Secretary to modify, after notice and opportunity for hearing, any conditions of this certification dealing with ~~pertaining to~~ consumptive use of water, monitoring, sampling, monitoring, reporting, specification of control equipment, related time schedules, effluent or emission standards or limitations, variances or exceptions to water quality standards, groundwater, mixing zones, zones of discharge, leachate control programs, railroad spur, transmission lines, access roads, or pipeline construction, source of treated effluent cooling water, mitigation, transfer or assignment of the certification or related federally delegated permits, or any special studies conducted as necessary to obtain the objectives of Chapter 403, Florida Statutes, which are not in conflict with the Conditions of Certification in Part VII.

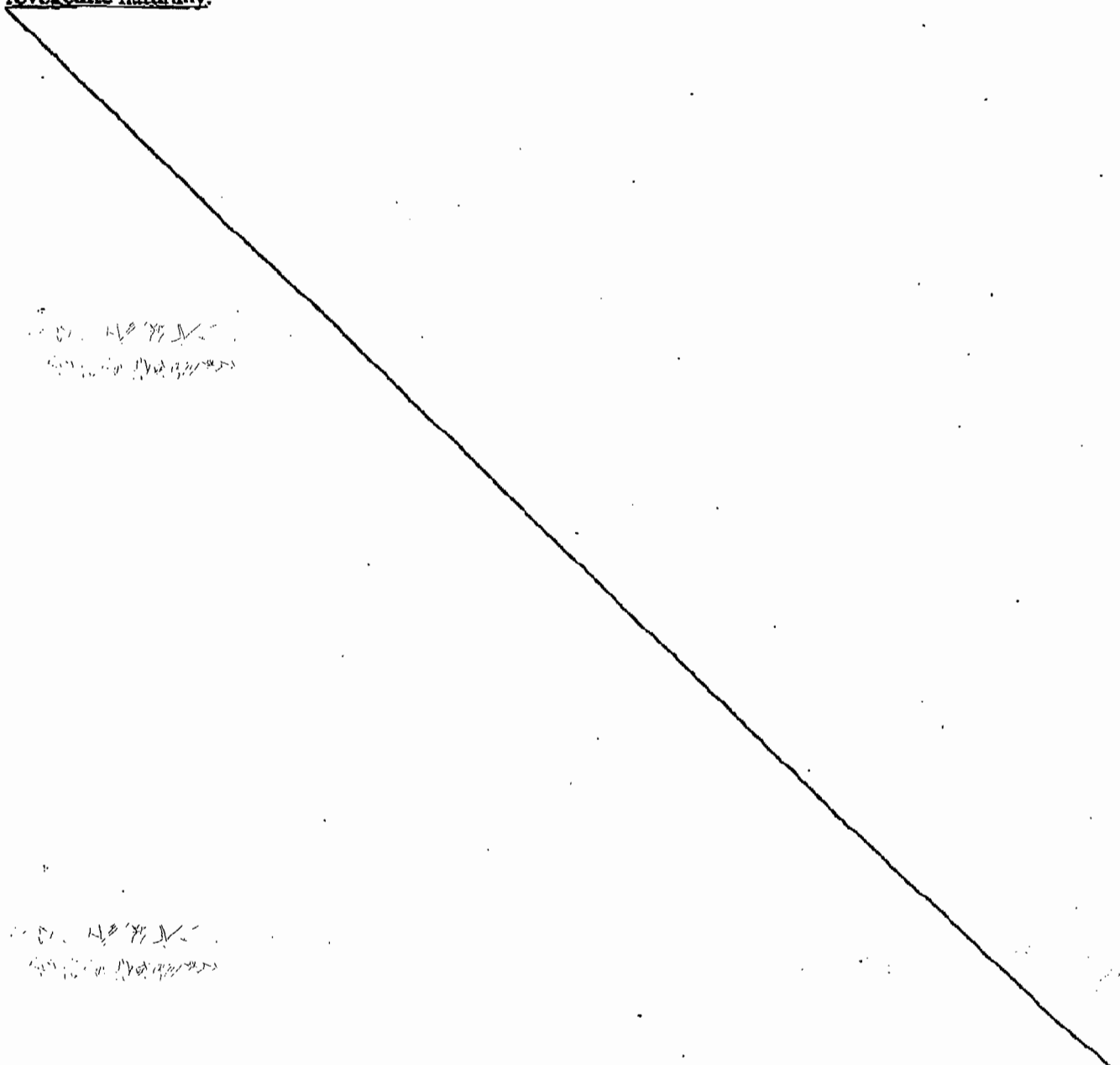
B. This certification shall be automatically modified to conform to any subsequent amendments, modifications, or renewals made by DEP to any separately issued Prevention of Significant Deterioration (PSD) permit, Title V Air Permit, or National Pollutant Discharge Elimination System (NPDES) permit for the facility under any federally delegated or approved program. OUC shall send each party to the original certification proceedings (at the party's last known address as shown in the record of the proceedings) notice of requests for modifications or renewals to the applicable federal permit if the request involves a relief mechanism (e.g. mixing zone, variance, alternate emission or discharge standard, etc.) from standards. DEP shall notify all parties to the certification proceedings of any intent to modify conditions under this section prior to taking final agency action.



C. All other modifications to these conditions shall be made in accordance with Section 403.516, Florida Statutes.

V/XXXVII. Landfill Gas and Condensate Pipeline Construction

OUC and its contractors will maintain *in situ* flow conditions within the upland cut ditches located approximately at stations 42+50 and 44+75 during construction of the landfill gas and gas condensate pipelines. Upon completion of construction at each of these locations, OUC and its contractors shall restore the banks of the ditches to natural grade and will allow the ditches to revegetate naturally.



Handwritten notes: 4/2/99, 11/13/99

Handwritten notes: 4/2/99, 11/13/99

**NOTICE OF RIGHTS**

Any party to this Order has a right to seek judicial review of this Order pursuant to Section 120.68, Florida Statutes, by the Filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, 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 of Appeal must be filed within 30 days from the date this Order is filed with the clerk of the Department.

**DONE AND ORDERED** this 22nd day of December 1997, in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**

*J. Perry Aldon*

**VIRGINIA B. WETTERELL**

*acting* Secretary

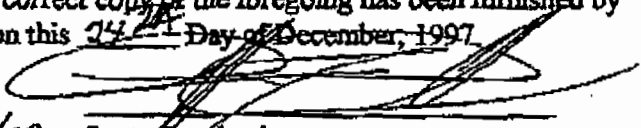
Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000  
(904) 488-1554

**FILING AND ACKNOWLEDGEMENT**  
FILED, on this date, pursuant to §128.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

*Tabina D'Neal* 12/24/97  
Clerk Date

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail to the parties listed below on this 24<sup>th</sup> Day of December, 1997

*for*  
  
\_\_\_\_\_  
Scott Goodland

Assistant General Counsel  
Department of Environmental Protection  
2600 Blair Stone Road, MS 35

C. Laurence Keesey  
Young, Van Assenderp & Varnadoe  
801 Laurel Oak Drive, Suite 300  
Naples, FL 34108

Aaron Dowling, Executive Director  
East Central Florida Regional  
Planning Council  
1011 Wymore Road, Suite 105  
Winter Park, FL 32789

Stephanie G. Krner  
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Dept. of Community Affairs  
2555 Shumard Oak Blvd  
Tallahassee, FL 32399-2100

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Assistant County Attorney  
Orange County  
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Orlando, FL 32801

Pamela S. Deskie, Esq.  
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Tallahassee, FL 32399-0450

Kathryn Menella, Esq.  
Senior Assistant General Counsel  
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Management District  
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Gerald Gunter Building  
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Game and Fresh Water Fish Comm.  
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Tallahassee, FL 32399-1600

Charles Lee  
Senior Vice President  
Florida Audubon Society  
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Casselberry, FL 32707

Irby G. Pugh, Esq.  
218 Annie St.  
Orlando, FL 32806

Fred Bryant, Esq.  
306 East College Avenue  
Tallahassee, FL 32302



Jeb Bush  
Governor

# Department of Environmental Protection

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:

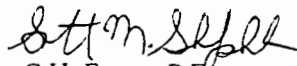
We have received your request to begin using Dow Chemical's COVOL 298-1 on your coal as a means of suppressing fugitive dust.

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-CD  
Ms. Marie Driscoll, OCEPC

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

DEC 17 1999

RECEIVED

DEC 22 1999

4APT-ARB

BUREAU OF AIR REGULATION

C.H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Department of Environmental Protection  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJ: EPA Review of the Proposed Title V Permit for  
Orlando Utilities Commission - Stanton Energy Center  
Permit Number 0950137-001-AV

Dear Mr. Fancy:

The purpose of this letter is to acknowledge the receipt of the State of Florida's proposed title V permit for the Orlando Utilities Commission - Stanton Energy Center, which was posted on DEP's web site on November 12, 1999. The U.S. Environmental Protection Agency (EPA) Region 4 has completed its review of the proposed permit and believes that the State has sufficiently addressed each of the comments made by Region 4 on the draft permit. Therefore, EPA does not plan to object to this permit. Please note, however, that our opportunity for review and comment on this permit does not prevent EPA from taking enforcement action for issues that were not raised during permit review. After final issuance, this permit may be reopened if EPA or the permitting authority later determines that it must be revised or revoked to assure compliance with applicable requirements.

We commend the efforts of your staff for facilitating the resolution of the permit issues. If you have any questions about this letter, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141.

Sincerely,

R. Douglas Neeley, Chief  
Air and Radiation Technology Branch  
Air, Pesticides and Toxics  
Management Branch

cc: Mr. Robert F. Hicks, Orlando Utilities Commission

# INTEROFFICE MEMORANDUM

**Date:** 17-Dec-1999 11:46am  
**From:** Bartlett.Elizabeth  
 Bartlett.Elizabeth@epamail.epa.gov  
**Dept:**  
**Tel No:**

**Subject:** Re [2] : permits

It's routing. Should go out soon (from Doug Neeley to Clair Fancy).  
Happy Holidays!

Reply Separator

Subject: Re: permits  
 Author: Scott.Sheplak@dep.state.fl.us at IN  
 Date: 12/15/1999 3:34 PM

Please go ahead and send us a letter indicating that EPA will not be objecting to the permit.

DEP ROUTING AND TRANSMITTAL SLIP	
<p>TO: (NAME, OFFICE, LOCATION) 3. _____</p> <p>1. <u>Howard Rhodes</u> 4. _____</p> <p>2. <u>Clair Fancy</u> 5. _____</p>	<p>COMMENTS:</p> <p><i>Re: FINAL permit</i></p> <p><i>I recommend approval</i></p> <p><i>Signature. EPA reviewed</i></p> <p><i>This one already and</i></p> <p><i>will not be objecting.</i></p>
<p>PLEASE PREPARE REPLY FOR:</p> <p>____ SECRETARY'S SIGNATURE</p> <p>____ DIV/DIST DIR SIGNATURE</p> <p>____ MY SIGNATURE</p> <p>____ YOUR SIGNATURE</p> <p>____ DUE DATE _____</p> <p>ACTION/DISPOSITION</p> <p>____ DISCUSS WITH ME</p> <p>____ COMMENTS/ADVISE</p> <p>____ REVIEW AND RETURN</p> <p>____ SET UP MEETING</p> <p>____ FOR YOUR INFORMATION</p> <p>____ HANDLE APPROPRIATELY</p> <p>____ INITIAL AND FORWARD</p> <p>____ SHARE WITH STAFF</p> <p>____ FOR YOUR FILES</p>	<p>FROM: <u>Scott Sheplak</u> DATE: <u>12/17</u> PHONE: _____</p>



Jeb Bush  
Governor

# Department of Environmental Protection

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

June 28, 1999

David B. Struhs  
Secretary

Mr. R. Douglas Neeley, Chief  
Air and Radiation Technology Branch  
Air, Pesticides and Toxics Management Division  
United States Environmental Protection Agency  
Region 4  
61 Forsyth Street  
Atlanta, GA 30303

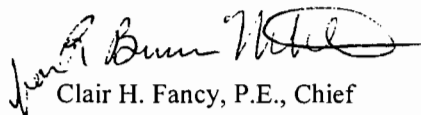
Re: PROPOSED Title V Permit No.: 0950137-001-AV  
Orlando Utilities Commission Stanton Energy Center

Dear Mr. Neeley:

The purpose of this memo is to notify you that the PROPOSED Title V Air Operation Permit for the Stanton Energy Center located at 5100 Alafaya Trail, Orlando, Orange County has been withdrawn. The applicant will require time to evaluate its options in light of the finding that its Phase II NOx Compliance (averaging) plan is not approved. Furthermore, certain revisions will be required to the application related to this issue.

If you have any questions, please contact Michael Halpin at 850/921-9530.

Sincerely,

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

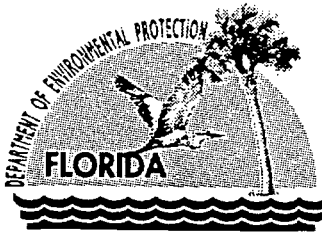
CHF/mph

copy furnished to:

Mr. Robert F. Hicks, O.U.C.  
Mr. Len Kozlov, DEP-CD  
Mr. G. Preston Lewis, P.E. ENSR

6/28/99 cc: Reading File  
Mike Halpin

Barbara / File



Jeb Bush  
Governor

# Department of Environmental Protection

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

June 24, 1999

David B. Struhs  
Secretary

Ms. Gracy R. Danois  
U. S. Environmental Protection Agency, Region IV  
345 Courtland Street N. E.  
Atlanta, Georgia 30365

Re: PROPOSED Title V Permit No.: 0950137-001-AV  
Orlando Utilities Commission Stanton Energy Center

Dear Ms. Danois:

The purpose of this memo is to notify you that the PROPOSED Title V Air Operation Permit for the Stanton Energy Center located at 5100 Alafaya Trail, Orlando, Orange County has been withdrawn. This withdrawal has been discussed with Ms. Elizabeth Bartlett.

If you have any questions related to this matter, please contact Michael Halpin at 850/921-9530.

Sincerely,

Scott M. Sheplak, P.E.  
Title V Section  
Bureau of Air Regulation

SMS/mph

copy furnished to:

Mr. Robert F. Hicks, O.U.C.  
Mr. Len Kozlov, DEP-CD  
Mr. G. Preston Lewis, P.E. ENSR



One Energy Place  
Pensacola, Florida 32520

Tel 850.444.6111

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MAY 12 2003

BUREAU OF AIR REGULATION



May 7, 2003

Mr. Scott M. Sheplak, P.E.  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**RE: First Fire and Synchronization to the Grid  
Stanton Units 25 & 26 (PSD-FL-313, PA 81-14SA2)**

Dear Mr. Sheplak:

This is a follow-up to our previous conversations regarding the first fire events for the Stanton Units 25 & 26. As requested I have put the first fire and synchronization dates in writing and they are as follows:

<u>Unit</u>	<u>First Fire</u>	<u>Synchronization to the Grid</u>
25, Gas Turbine A	April 28, 2003	April 29, 2003
26, Gas Turbine B	May 6, 2003	May 7, 2003

If you should have any questions regarding this information please feel free to give me a call at (850) 444-6573.

Sincerely,

Richard "Mike" Markey, QEP  
Environmental Affairs

Cc: Ronnie Walston, Southern Power  
Robert Schaffeld, Southern Power  
Heather Turner, Southern Power  
Brian Barham, Southern Company Services  
Danny Herrin, Southern Company Services  
Tuck Tucker, Gulf Power Company  
Jim Vick, Gulf Power Company  
G. Dwain Waters, Gulf Power Company  
Denise Stalls, OUC  
Fred Haddad, OUC  
Lynn Haynes, EPA - Region IV  
Leonard Kozlov, FDEP - Central District  
John Turner, FDEP - Central District  
Garry Kuberski - FDEP - Central District

Fl -  
good correspondence

One Energy Place  
Pensacola, Florida 32520

Tel 850.444.6111

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APR 07 2003

BUREAU OF AIR REGULATION



Certified

April 2, 2003

Mr. Scott M. Sheplak, P.E.  
Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**RE: Installation Confirmation and Guarantee of Performance  
Combined Cycle Cooling Tower Drift Eliminators – Stanton Units 25 & 26  
Specific Condition 20, PSD-FL-313, PA 81-14SA2**

Dear Mr. Sheplak:

The cooling tower and drift eliminators for the Stanton A permit have been installed. The drift eliminators utilized meet the requirements in Specific Condition 20 of the PSD permit.

If you should have any questions regarding this submittal, please feel free to give me a call at (850) 444-6573.

Sincerely,

Richard "Mike" Markey, P.G., Q.E.P.  
Environmental Affairs

Enclosure – Cooling Tower Drift Letter – Marley Cooling Technologies

- Cc: Ronnie Walston, Southern Power
- Robert Schaffeld, Southern Power
- Heather Turner, Southern Power
- Brian Barham, Southern Company Services
- Danny Herrin, Southern Company Services
- Tuck Tucker, Gulf Power Company
- Jim Vick, Gulf Power Company
- G. Dwain Waters, Gulf Power Company
- Denise Stalls, OUC
- Lynn Haynes, EPA – Region IV
- Leonard Kozlov, FDEP – Central District
- John Turner, FDEP – Central District
- Garry Kuberski, FDEP – Central District

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Pensacola, Florida 32520

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BUREAU OF AIR REGULATION



March 31, 2003

Mr. Scott M. Sheplak, P.E.  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**RE: STARTUP NOTIFICATION**  
**Stanton Units 25 & 26 (PSD-FL-313, PA 81-14SA2)**

Dear Mr. Sheplak:

Southern Company Florida LLC hereby modifies our initial startup notification provided on March 14, 2002 for the combined cycle units referenced above at the Curtis H. Stanton Energy Center in Orange County. The updated "first fire" for Unit 25 now scheduled between April 21 and April 30, 2003. It is anticipated that Unit 26 will startup 7-10 days after Unit 25. Verbal notification of the first fire will be provided 48 hours prior to this event. The "tie to the grid" trigger date will be the same dates as discussed above.

If you have any questions or need further information regarding this notification, please call me at (850) 444-6573.

Sincerely,

Richard "Mike" Markey, P.G., Q.E.P.  
Environmental Affairs

Cc: Robert G. Moore, Southern Power  
Ronnie Walston, Southern Power  
Robert Schaffeld, Southern Power  
Heather Turner, Southern Power  
Brian Barham, Southern Company Services  
Danny Herrin, Southern Company Services  
Tuck Tucker, Gulf Power Company  
Jim Vick, Gulf Power Company  
G. Dwain Waters, Gulf Power Company  
Denise Stalls, OUC  
Lynn Haynes, EPA - Region IV  
Leonard Kozlov, FDEP - Central District  
John Turner, FDEP - Central District  
Garry Kuberski, FDEP - Central District



Marley Cooling Technologies  
7401 W 129 Street  
Overland Park, KS 66213 USA  
913 664 7434  
Fax 913 664 7857  
darin\_baughner@marleyct.com

March 22, 2003

Southern Company Site Manager  
Stanton Combined Cycle Project  
P.O. BOX 781295  
Orlando, FL 32878

**Att: Mr. Ronnie Walston**

**RE: Stanton Energy Center Cooling Tower Drift**

Marley offers the following statement regarding the drift rate:

"The Stanton cooling tower was installed with Marley's TU12C drift eliminators. The TU12 eliminator is the latest in drift elimination technology and is designed to allow a maximum drift rate of 0.0005%."

I trust this will satisfy the concerns the plant has. Please contact us if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Darin Baughner".

Darin Baughner  
Manager, Sales Support  
Field Erected Products

One Energy Place  
Pensacola, FL 32520

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MAR 19 2003

Date: March 14, 2003

BUREAU OF AIR REGULATION



Scot Sheplak  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Mail Station #5510  
Tallahassee, FL 32399-2400

RE: STANTON A COMBINED CYCLE; PERMIT # 0950137-002-AC 9PSD-313)  
PROCESS VARIABLES

Pursuant to Special Condition #43, please find the following list of equipment which will be used to determine process variables related to emissions reductions at Plant Stanton A. This equipment will be calibrated to allow the applicable process variable to be determined within 10% of its true value [Rule 62-297.310(5), F.A.C.]

**CT A - Natural Gas Flowmeter: Manufacturer - Triad, S/N 22-4027, Model # 9694**  
**CT A - Fuel Oil Flowmeter: Manufacturer - Micro Motion, S/N 249979, Model # D300 (3") DS300S155SU**  
**CT B - Natural Gas Flowmeter: Manufacturer Triad, S/N 22-4028, Model # 9694**  
**CT B - Fuel Oil Flowmeter: Manufacturer - Micro Motion, S/N 249965, Model # D300 (3") DS300S155SU**  
**HRSG A Duct Burner - Natural Gas Flowmeter: COEN, S/N 0075404, Model # 2335-004-327**  
**HRSG B Duct Burner - Natural Gas Flowmeter: COEN, S/N 0075405, Model # 2335-004-327**  
**Ammonia Flowmeter**  
**NOx analyzer on upstream side of SCR**

Please call Mike Markey (850.444.6573) or me (850.444.6153) if you have questions or if we can be of service.

A handwritten signature in black ink, appearing to read "John McPherson".

Thank you,  
John McPherson  
Environmental Specialist  
Gulf Power Company

One Energy Place  
Pensacola, Florida 32520

Tel 850.444.6111

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MAR 18 2003

BUREAU OF AIR REGULATION



March 14, 2003

Mr. Scott M. Sheplak, P.E.  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**RE: Custom Fuel Monitoring Plan  
Stanton Units 25 & 26 (PSD-FL-313, PA 81-14SA2)**

Dear Mr. Sheplak:

This letter is to confirm that the Custom Fuel Monitoring Plan requirements referenced above in our final permit PSD-FL-313, constitutes an approved CFMP and these requirements will be followed at the Stanton A facility. The CFMP portions of our permit have been included as Attachment A.

If you should have any questions regarding the Custom Fuel Monitoring Plan, please feel free to call Mike Markey at (850) 444-6573 or myself at (850) 444-6527.

Sincerely,

G. Dwain Waters, Q.E.P.  
Air Quality Programs Supervisor

Attachment A – NSPS Subpart GG Requirements for Gas Turbines

CC: Ronnie Walston, Southern Power  
Robert Shaffeld, Southern Power  
Heather Turner, Southern Power  
Brian Barham, Southern Company Services  
Danny Herrin, Southern Company Services  
Jim Vick, Gulf Power Company  
Tuck Tucker, Gulf Power Company  
Mike Markey, Gulf Power Company

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**ATTACHMENT A**  
**NSPS SUBPART GG REQUIREMENTS**  
**FOR GAS TURBINES**



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

## PERMITTEE:

OUC/KUA/FMPA/Southern Company – Florida, LLC  
One Energy Place  
Pensacola, FL 32520-0328

File No.	PSD-FL-313 (PA81-14SA2)
FID No.	0950137
SIC No.	4911
Expires:	December 31, 2004

## Authorized Representative:

Mr. Robert G. Moore, VP of Power Generation and  
Transmission, Gulf Power Company

## PROJECT AND LOCATION:


Permit pursuant to the requirements for the Prevention of Significant Deterioration of Air Quality (PSD Permit) for the construction of a nominal 640 megawatt (MW) Combined Cycle unit consisting of: two nominal 170 MW, General Electric "F" Class (PG7241FA) combustion turbine-electrical generators, fired with pipeline natural gas or diesel and equipped with evaporative coolers on the inlet air system; two supplementally fired heat recovery steam generators (HRSGs), each with a 160 ft. stack; one steam turbine-electrical generator rated at approximately 300 MW; one fresh water cooling tower; one distillate fuel storage tank and ancillary equipment. The combined cycle unit will achieve approximately 700 megawatts during extreme winter peaking conditions. The unit is to be installed at the existing OUC Stanton Energy Center, located at 5100 South Alafaya Trail, Orlando, Orange County. UTM coordinates are: Zone 17; 483.61 km E, 3151.1 km N.

## STATEMENT OF BASIS:

This PSD permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and 40CFR52.21. The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection.

The attached Appendices are made a part of this permit:

Appendix GC	Construction Permit General Conditions
Appendix GG	Subpart GG, Standards of Performance for Stationary Gas Turbines
Appendix XS	Semi-Annual Continuous Emission Monitor Systems Report

  
Howard L. Rhodes, Director  
Division of Air Resources  
Management

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**SECTION IV. APPENDIX GG**

**NSPS SUBPART GG REQUIREMENTS FOR GAS TURBINES**

**NSPS SUBPART GG REQUIREMENTS**

[Note: Inapplicable provisions have been deleted in the following conditions, but the numbering of the original rules has been preserved for ease of reference to the original rules. The term "Administrator" when used in 40 CFR 60 shall mean the Department's Secretary or the Secretary's designee. Department notes and requirements related to the Subpart GG requirements are shown in bold immediately following the section to which they refer. The rule basis for the Department requirements specified below is Rule 62-4.070(3), F.A.C.]

Pursuant to 40 CFR 60.332 Standard for Nitrogen Oxides:

(a) On and after the date of the performance test required by § 60.8 is completed, every owner or operator subject to the provisions of this subpart as specified in paragraph (b) section shall comply with:

(1) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of:

$$STD = 0.0075 \frac{(14.4)}{Y} + F$$

where:

STD = allowable NO<sub>x</sub> emissions (percent by volume at 15 percent oxygen and on a dry basis).

Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

F = NO<sub>x</sub> emission allowance for fuel-bound nitrogen as defined in paragraph (a)(3) of this section.

(3) F shall be defined according to the nitrogen content of the fuel as follows:

Fuel-bound nitrogen (percent by weight)	F (NO <sub>x</sub> percent by volume)
N ≤ 0.015	0
0.015 < N ≤ 0.1	0.04(N)
0.1 < N ≤ 0.25	0.004 + 0.0067(N - 0.1)
N > 0.25	0.005

Where, N = the nitrogen content of the fuel (percent by weight).

**Department requirement:** While firing gas, the "F" value shall be assumed to be 0.

[Note: This is required by EPA's March 12, 1993 determination regarding the use of NO<sub>x</sub> CEMS. The "Y" values are approximately 10.0 for natural gas and 10.6 for fuel oil. The equivalent emission standards are 108 and 102 ppmvd at 15% oxygen. The emissions standards of this permit are more stringent than this requirement.]

(b) Electric utility stationary gas turbines with a heat input at peak load greater than 107.2 gigajoules per hour (100 million Btu/hour) based on the lower heating value of the fuel fired shall comply with the provisions of paragraph (a)(1) of this section.

## SECTION IV. APPENDIX GG

### NSPS SUBPART GG REQUIREMENTS FOR GAS TURBINES

#### Pursuant to 40 CFR 60.333 Standard for Sulfur Dioxide:

On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, every owner or operator subject to the provision of this subpart shall comply with:

- (b) No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel, which contains sulfur in excess of 0.8 percent by weight.

#### Pursuant to 40 CFR 60.334 Monitoring of Operations:

- (b) The owner or operator of any stationary gas turbine subject to the provisions of this subpart shall monitor sulfur content and nitrogen content of the fuel being fired in the turbine. The frequency of determination of these values shall be as follows:

- (1) If the turbine is supplied its fuel from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source.

**Department requirement: The owner or operator is allowed to use vendor analyses of the fuel as received to satisfy the sulfur content monitoring requirements of this rule for fuel oil. Alternatively, if the fuel oil storage tank is isolated from the combustion turbines while being filled, the owner or operator is allowed to determine the sulfur content of the tank after completion of filling of the tank, before it is placed back into service.**

**[Note: This is consistent with guidance from EPA Region 4 dated May 26, 2000 to Ronald W. Gore of the Alabama Department of Environmental Management.]**

- (2) If the turbine is supplied its fuel without intermediate bulk storage the values shall be determined and recorded daily. Owners, operators or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with paragraph (b) of this section.

**(1) Department requirement: The requirement to monitor the nitrogen content of pipeline quality natural gas fired is waived. The requirement to monitor the nitrogen content of fuel oil fired is waived because a NO<sub>x</sub> CEMS shall be used to demonstrate compliance with the NO<sub>x</sub> limits of this permit. For purposes of complying with the sulfur content monitoring requirements of this rule, the owner or operator shall obtain a monthly report from the vendor indicating the sulfur content of the natural gas being supplied from the pipeline for each month of operation.**

**(2) [Note: This is consistent with EPA's custom fuel monitoring policy and guidance from EPA Region 4.]**

- (c) For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:

- (1) *Nitrogen oxides.* Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with 40 CFR 60.332 by the performance test required in § 60.8 or any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test required in § 60.8. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, gas turbine load, and nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a).

## SECTION IV. APPENDIX GG

### NSPS SUBPART GG REQUIREMENTS FOR GAS TURBINES

**Department requirement:** NO<sub>x</sub> emissions monitoring by CEM system shall substitute for the requirements of paragraph (c)(1) because a NO<sub>x</sub> monitor is required to demonstrate compliance with the standards of this permit. Data from the NO<sub>x</sub> monitor shall be used to determine "excess emissions" for purposes of 40 CFR 60.7 subject to the conditions of the permit.

[Note: This is consistent with guidance from EPA Region 4 dated May 26, 2000 to Ronald W. Gore of the Alabama Department of Environmental Management.]

- (2) *Sulfur dioxide.* Any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8 percent.

Pursuant to 40 CFR 60.335 Test Methods and Procedures:

- (a) To compute the nitrogen oxides emissions, the owner or operator shall use analytical methods and procedures that are accurate to within 5 per-cent and are approved by the Administrator to determine the nitrogen content of the fuel being fired.
- (b) In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided for in 40 CFR 60.8(b). Acceptable alternative methods and procedures are given in paragraph (f) of this section.
- (c) The owner or operator shall determine compliance with the nitrogen oxides and sulfur dioxide standards in 40 CFR 60.332 and 60.333(a) as follows:
- (1) The nitrogen oxides emission rate (NO<sub>x</sub>) shall be computed for each run using the following equation:

$$\text{NO}_x = (\text{NO}_{x0}) (\text{Pr}/\text{Po})^{0.5} e^{19(\text{Ho}-0.00633)} (288^\circ\text{K}/\text{Ta})^{1.53}$$

where:

- NO<sub>x</sub> = emission rate of NO<sub>x</sub> at 15 percent O<sub>2</sub> and ISO standard ambient conditions, volume percent.
- NO<sub>x0</sub> = observed NO<sub>x</sub> concentration, ppm by volume.
- Pr = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure, mm Hg.
- Po = observed combustor inlet absolute pressure at test, mm Hg.
- Ho = observed humidity of ambient air, g H<sub>2</sub>O/g air.
- e = transcendental constant, 2.718.
- Ta = ambient temperature, °K.

**Department requirement:** The owner or operator is not required to have the NO<sub>x</sub> monitor continuously correct NO<sub>x</sub> emissions concentrations to ISO conditions. However, the owner or operator shall keep records of the data needed to make the correction, and shall make the correction when required by the Department or Administrator.

[Note: This is consistent with guidance from EPA Region 4.]

- (2) The monitoring device of 40 CFR 60.334(a) shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with 40 CFR 60.332 at 30, 50, 75, and 100 percent of peak load or at four points in the normal operating range of the gas turbine, including the

## SECTION IV. APPENDIX GG

### NSPS SUBPART GG REQUIREMENTS FOR GAS TURBINES

minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer.

**Department requirement:** The owner or operator is allowed to conduct initial performance tests at a single load because a NO<sub>x</sub> monitor shall be used to demonstrate compliance with the BACT NO<sub>x</sub> limits of this permit.

[Note: This is consistent with guidance from EPA Region 4.]

- (3) Method 20 shall be used to determine the nitrogen oxides, sulfur dioxide, and oxygen concentrations. The span values shall be 300 ppm of nitrogen oxide and 21 percent oxygen. The NO<sub>x</sub> emissions shall be determined at each of the load conditions specified in paragraph (c)(2) of this section.

**Department requirement:** The owner or operator is allowed to make the initial compliance demonstration for NO<sub>x</sub> emissions using certified CEM system data, provided that compliance be based on a minimum of three test runs representing a total of at least three hours of data, and that the CEMS be calibrated in accordance with the procedure in section 6.2.3 of Method 20 following each run. Alternatively, initial compliance may be demonstrated using data collected during the initial relative accuracy test audit (RATA) performed on the NO<sub>x</sub> monitor. The span value specified in the permit shall be used instead of that specified in paragraph (c)(3) above.

[Note: These initial compliance demonstration requirements are consistent with guidance from EPA Region 4. The span value is changed pursuant to Department authority and is consistent with guidance from EPA Region 4.]

- (d) The owner or operator shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) as follows: ASTM D 2880-71 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 shall be used for the sulfur content of gaseous fuels (incorporated by reference – see 40 CFR 60.17). The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator.

**Department requirement:** The permit specifies sulfur testing methods and allows the owner or operator to follow the requirements of 40 CFR 75 Appendix D to determine the sulfur content of liquid fuels.

[Note: This requirement establishes different methods than provided by paragraph (d) above, but the requirements are equally stringent and will ensure compliance with this rule.]

- (e) To meet the requirements of 40 CFR 60.334(b), the owner or operator shall use the methods specified in paragraphs (a) and (d) of this section to determine the nitrogen and sulfur contents of the fuel being burned. The analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.

[Note: The fuel analysis requirements of the permit meet or exceed the requirements of this rule and will ensure compliance with this rule.]

*File*

Florida Department of  
**Environmental Protection**

**Memorandum**

---

TO: Len Kozlov, CD  
FROM: Scott Sheplak, P.E. *sm8*  
DATE: July 28, 1997  
SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit  
Orlando Utilities Commission, Stanton Energy: 0950137-001-AV

Enclosed is an application package for a Title V operation permit that is being processed in Tallahassee. Please review the package for completeness and respond in writing by August 15, 1997, if you have any comments. Otherwise, no response is required.

It is very important to verify the compliance statement regarding the facility, since we do not have a readily effective means of determining compliance at the time the application was submitted. Please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. You should have a copy on file of the original initial Title V permit application submittal. Also, please do not write on these documents.

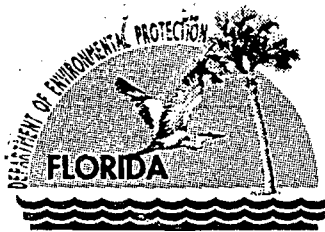
If there are any questions, please call the project engineer, Syed Arif, at 904/488-1344 or SC: 278-1344.

RBM/bjb

Enclosure

cc: Alan Zahm

*7/28 Reading Syed Arif*



Jeb Bush  
Governor

File Barbara

# Department of Environmental Protection

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

David B. Struhs  
Secretary

October 16, 2000

Mr. Frederick F. Haddad, Jr.  
Vice President, Power Resources Business Unit  
Orlando Utilities Commission  
500 South Orange Avenue  
P.O. Box 3193  
Orlando, Florida 32802

Re: Request for Permit Exemption for New 25-ton Silo


Dear Mr. Haddad:

We are in receipt of your letter, dated September 21, requesting a conditional exemption from construction permitting per 62-4.040, Florida Administrative Code (F.A.C.), for the construction of a 25-ton lime silo and back-up feed system. After reviewing your submittal and verifying your calculations, it is the Department's opinion that an exemption from construction permitting is not needed since this project qualifies for a generic permit exemption pursuant to Rule 62-210.300(3)(b)1., F.A.C. Under the provisions of this rule, an emissions unit that emits less than 5 tons of a regulated pollutant is exempt from the permitting requirements of Rules 62-210, 62-212, and 62-4, F.A.C.

Pursuant to Rule 62-213.430(6)(a), F.A.C., "Emissions units or activities, which are added to a Title V source after issuance of a permit under this chapter, shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify as insignificant pursuant to this rule."

Based on these rules, there is no permitting requirement at this time. As long as the potential emissions do not change from those outlined in your request, you may wait until the Title V permit renewal to incorporate this unit into the insignificant emissions unit appendix. Please notify the Department before operating this unit in a manner that would increase the potential emissions above those submitted. If you should have any questions regarding this correspondence, please contact Jonathan Holtom, P.E. at (850) 921-9531, or write to me at the above letterhead address.

Sincerely,

  
Scott M. Sheplak, P.E.  
Administrator  
Title V Section

CHF/sms/h

"More Protection, Less Process"

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Orlando Utilities Commission  
500 South Orange Avenue  
P.O. Box 3193  
Orlando, Florida 32802  
Phone: 407.423.9100  
Administrative Fax: 407.236.9616  
Purchasing Fax: 407.384.4141  
Website: www.ouc.com

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*The Reliable One*

Certified Mail No. 7000 0600 0027 0641 1503  
Return Receipt Requested

September 21, 2000

Mr. Scott M. Sheplak, P. E., Administrator  
Title V Section  
Division of Air Resources Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road - MS 5500  
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

In December 1997, OUC received departmental approval for a modification to the Conditions of Certification for Stanton Energy Center Units 1 and 2 allowing the facility to substitute off-site flyash/lime for use in the wet scrubber sludge stabilization process. This material has been successfully incorporated into the standard operating procedures of the plant for the past two years.

To assure system reliability, the plant is proposing the installation of a 25-ton silo and backup lime feed system. This would be used as a make-up lime system and backup during the period of time when the off-site flyash/lime material is unavailable. The attached diagram includes the proposed equipment arrangement and baghouse emission worksheet for the proposed baghouse. Based on the calculations the annual emissions would be .012 tons/year.

OUC is requesting a conditional exemption from a construction permit, per 62-4.040, and the addition of this emission source to the list of Insignificant Emissions in the facility's Title V permit. If you require further information on this request, please contact Denise Stalls at 407-423-9141. Your assistance on this matter is appreciated.

Sincerely,

Frederick F. Haddad, Jr.  
Vice President  
Power Resources Business Unit

FFH:rc  
Enclosures

I:\FDEP25tonsiloSEC

**CGS**

**Engineering Services Inc.**

100 Baltimore Pike

Chadds Ford, PA 19317

Telephone (610) 558-1177

Fax (610) 558-1207

September 14, 2000

VFL Technology Corporation

16 Hagerty Boulevard

West Chester, Pa. 19382-7594

Attn.: Mr. Gernot Jobst

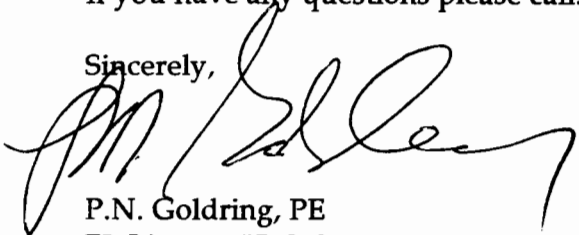
Re: Baghouse Emission Calculations for Orlando Power

I have reviewed the calculations for the particle emissions from the Belgrade Steel Tank Dust House Model 225.

They are satisfactory. The Emission Worksheet is attached

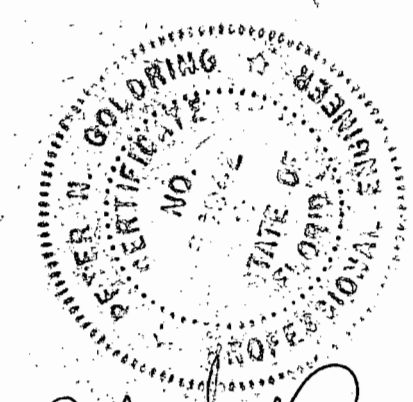
If you have any questions please call.

Sincerely,



P.N. Goldring, PE  
FL License #54942

RECEIVED  
SEP 18 2000



*(Handwritten signature)*  
9/14/2000



## Baghouse Emmission Worksheet

Manufacturer and Model: Belgrade Steel Tank "Belle" Dust House Model 225

Specify: XXX Baghouse  
          \_\_\_\_\_ Cartridge  
          \_\_\_\_\_ Other, Specify

Number of Bages or Cartridges: \_\_\_\_\_18

Total Bag or Cartridge Area: \_\_\_\_\_370 (ft<sup>2</sup>)

Maximum Capacity: \_\_\_\_\_675 (ACFM)

Air to Cloth Ratio: 1.82432:1

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A) From AP42 - Cement Unloading (Pnuematic)

Uncontrolled Emission: \_\_\_\_\_0.27 (lbs PM/ton)  
Filterable Particulate Matter (PM) Before Filter

B) Application

Loading of 25 tons of material takes 1 hour = 25 tons/hour

Particulate Matter before Filter:

25 tons/hour x 0.27 lbs PM/ton = 6.75 #/Hr PM before Filter

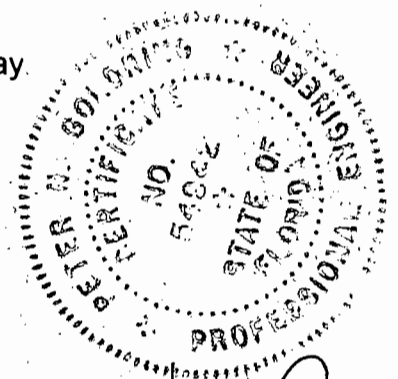
Daily Material Requirements: \_\_\_\_\_25 Tons

C) From Manufacturer

Filter Efficiency: 99% for PM 1.2 micron or greater

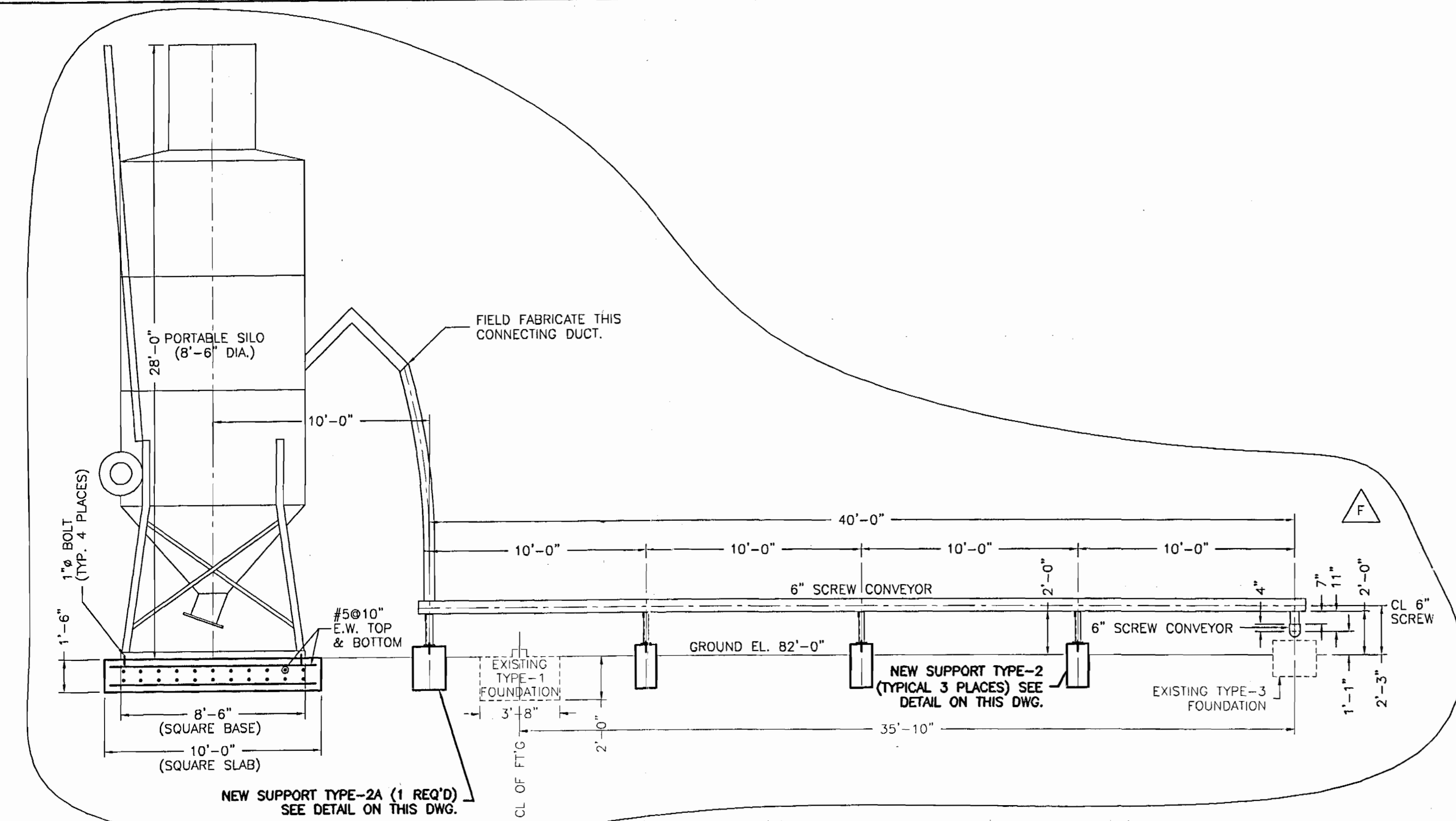
Hourly Loading: 6.75 lbs/hour x 0.01 = 0.0675 lbs/hour

Daily Loading: 6.75 lbs/day x 0.01 = 0.0675 lbs/day

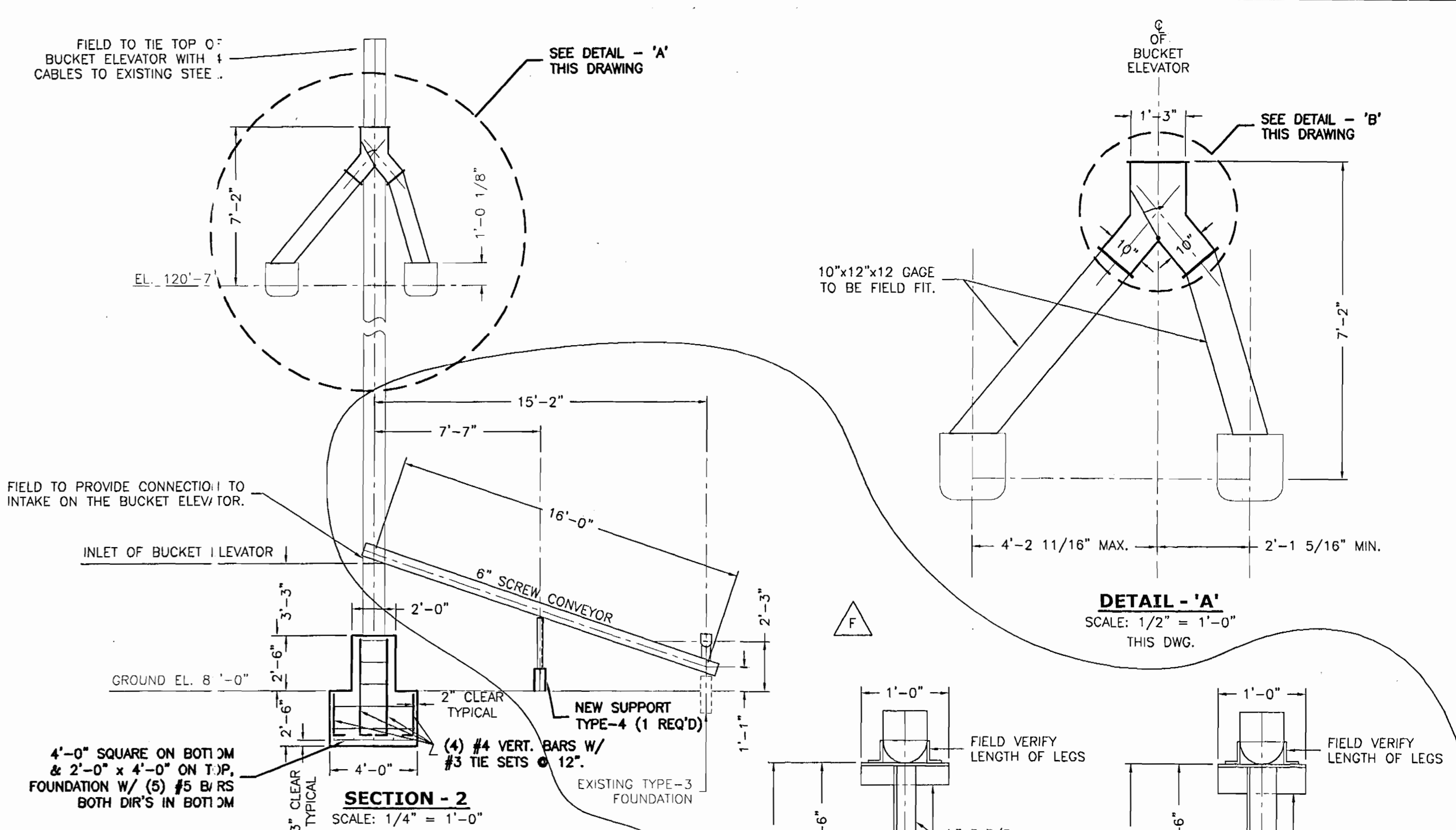


*Peter N. 501*  
9/14/2000



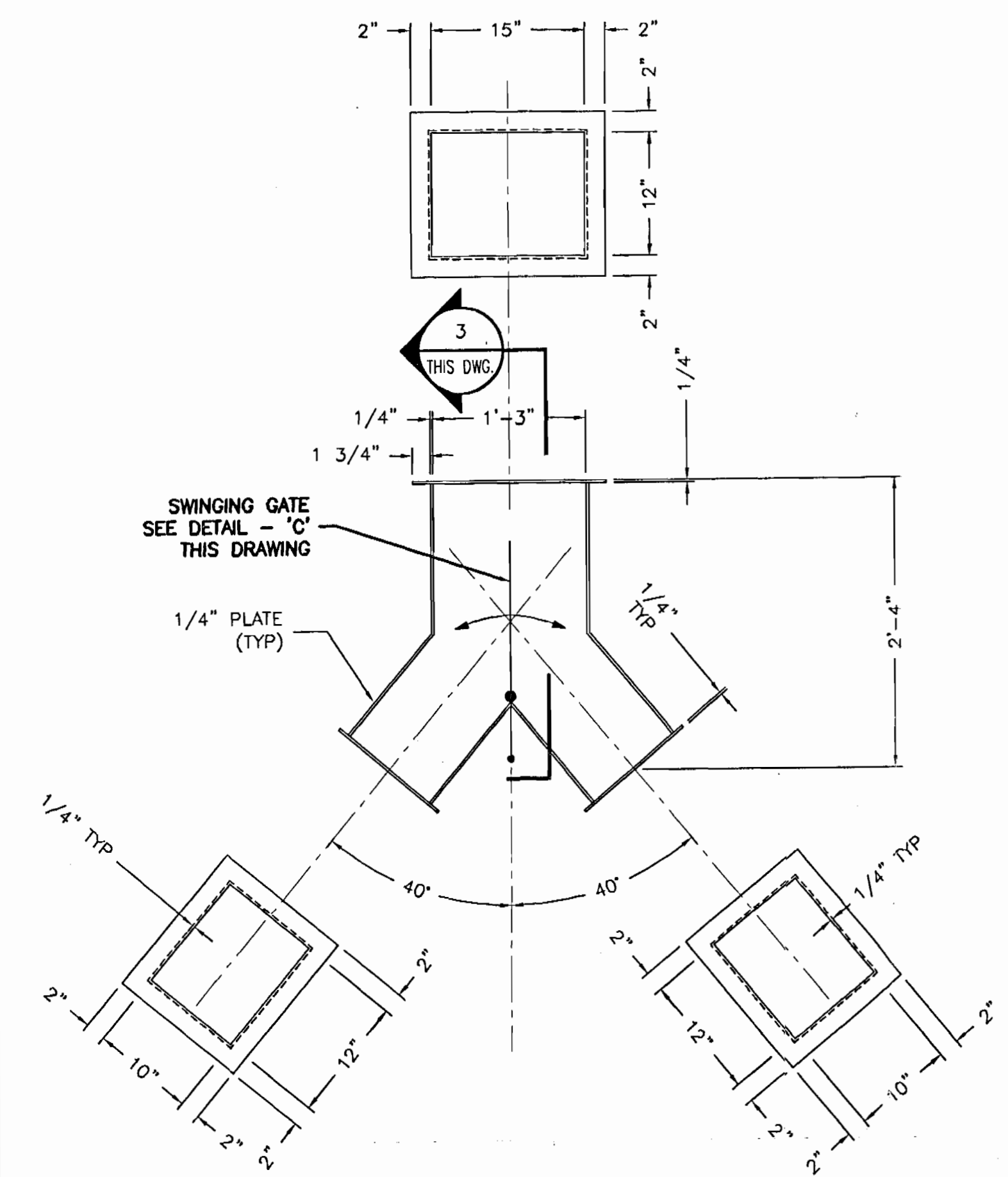


**SECTION - 1**  
(DWG. 306-21-01)  
SCALE: 1/4" = 1'-0"



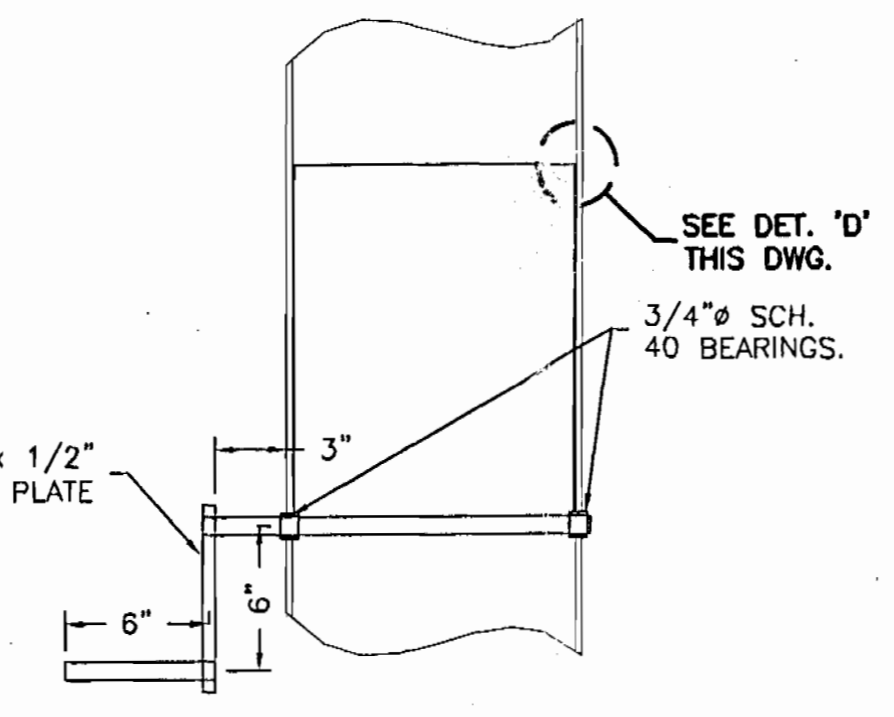
**DETAIL - 'A'**  
SCALE: 1/2" = 1'-0"  
THIS DWG.

**SECTION - 2**  
SCALE: 1/4" = 1'-0"  
DWG. 306-21-01

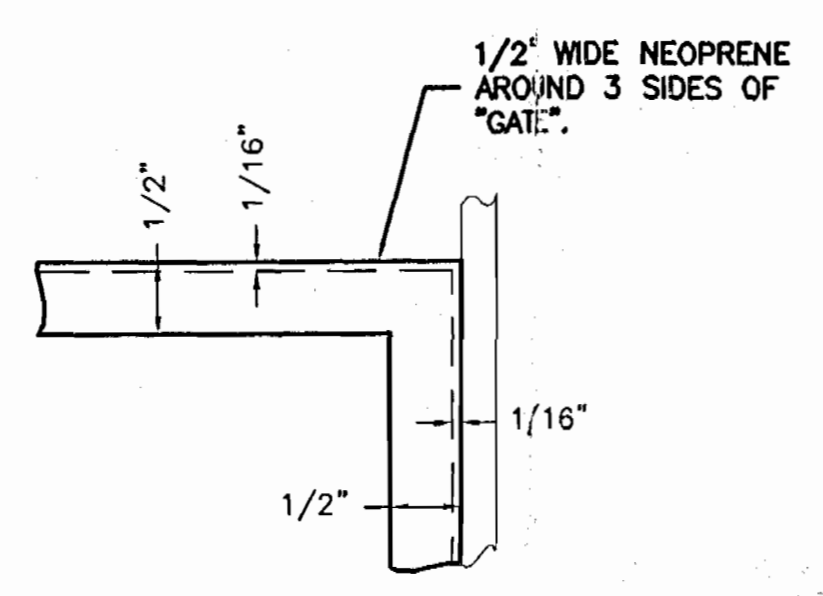


**DETAIL - 'B'**  
SCALE: 1" = 1'-0"  
THIS DWG.

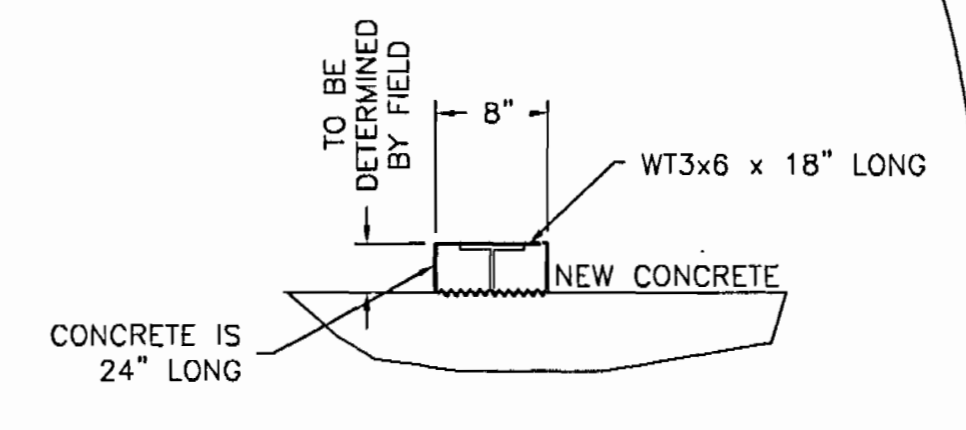
**DETAIL - 'C'**  
SCALE: 3" = 1'-0"  
THIS DWG.



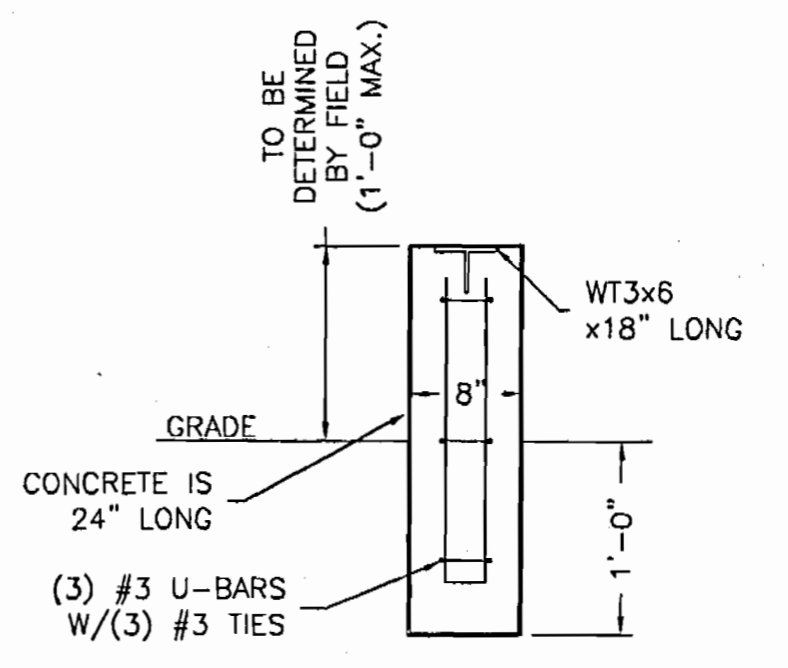
**SECTION - 3**  
SCALE: 1 1/2" = 1'-0"  
THIS DWG.



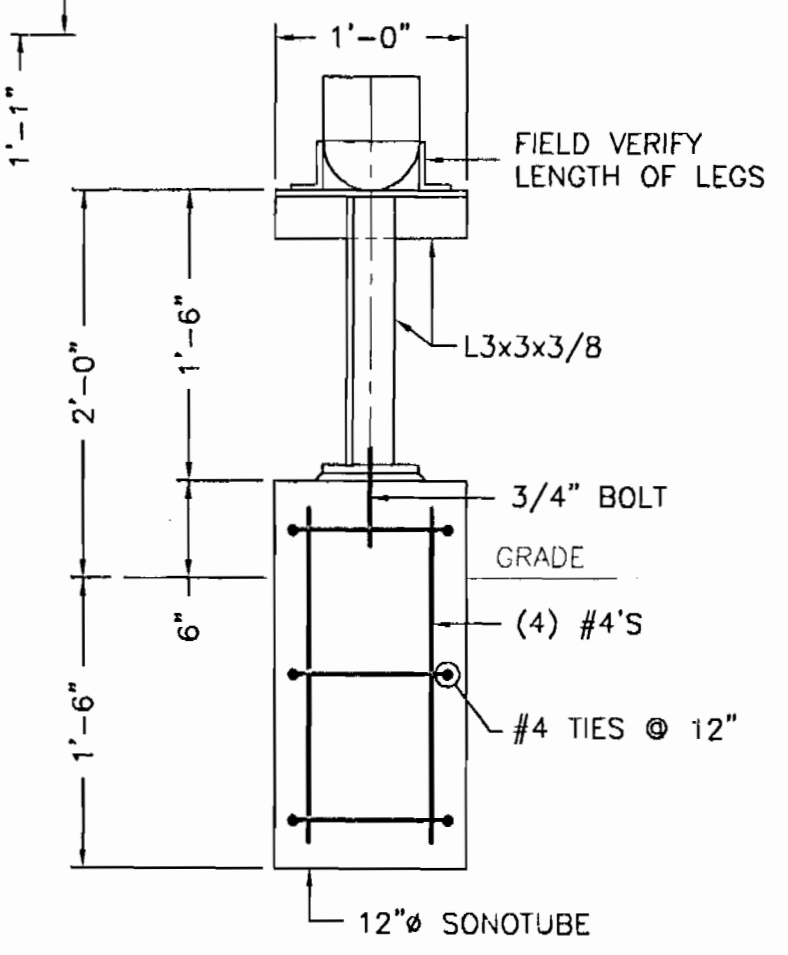
**DETAIL - 'D'**  
NO SCALE  
THIS DWG.



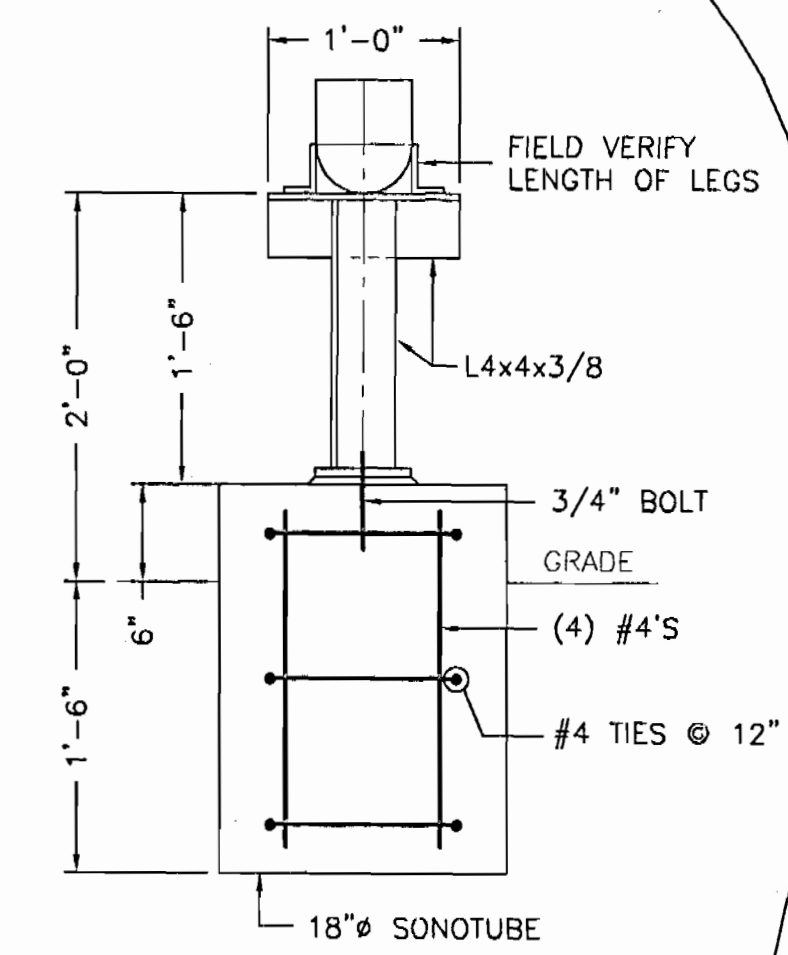
**SUPPORT TYPE-1**  
SCALE: 1" = 1'-0"  
THIS DWG.



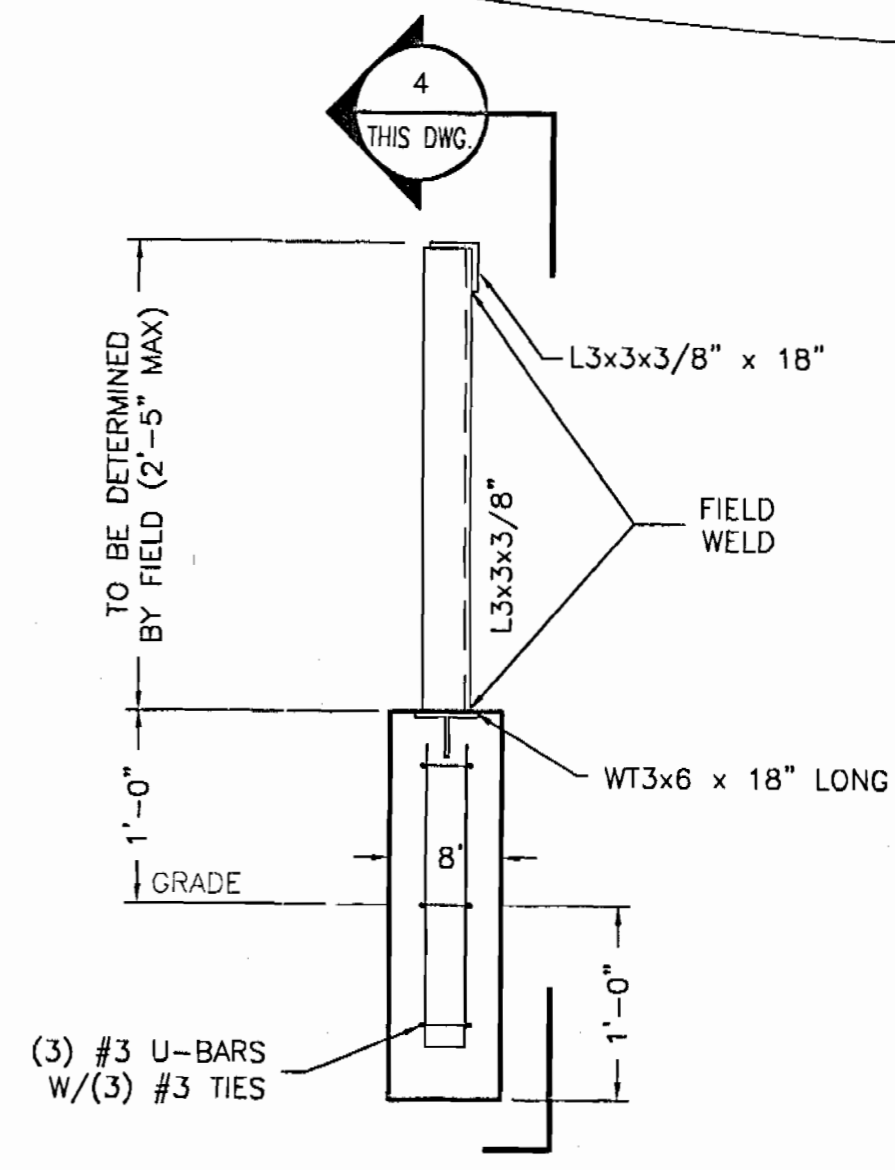
**SUPPORT TYPE-3**  
SCALE: 1" = 1'-0"  
THIS DWG.



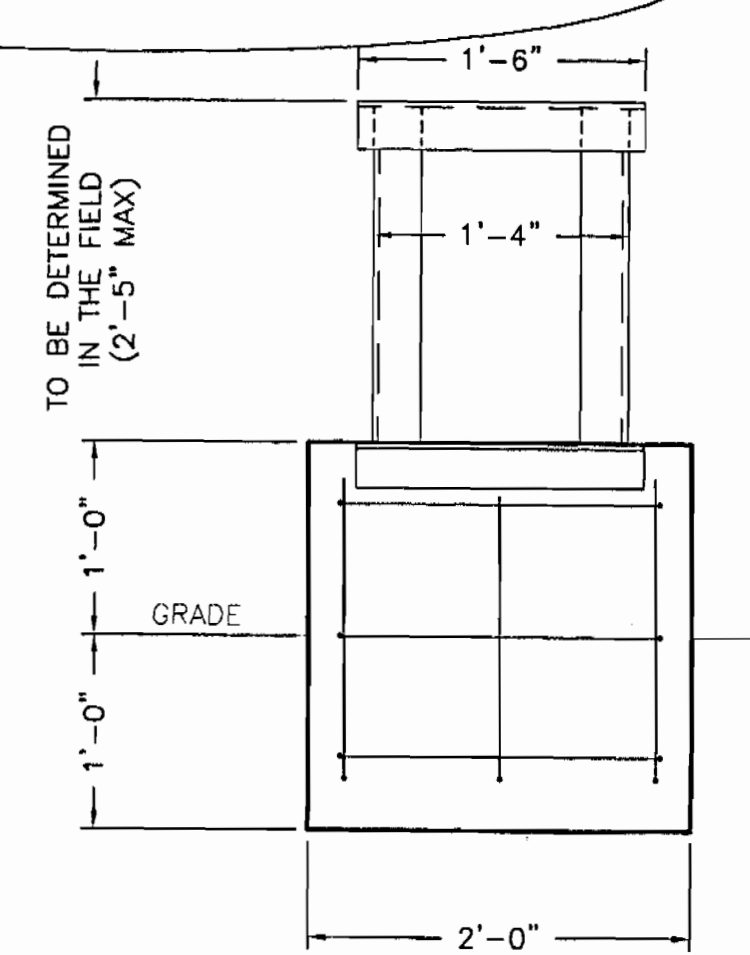
**SUPPORT TYPE-2**  
(THIS DWG.)  
(3 REQUIRED)  
SCALE: 1" = 1'-0"



**SUPPORT TYPE-2A**  
(THIS DWG.)  
(1 REQUIRED)  
SCALE: 1" = 1'-0"



**SUPPORT TYPE-4**  
(THIS DWG.)  
(1 REQUIRED)  
SCALE: 1" = 1'-0"



**SECTION - 4**  
SCALE: 1" = 1'-0"  
THIS DWG.

NO.	DATE	BY	APP.	APP.	AFC	PROJECT	REVISION	NO.	DATE	BY	APP.	APP.	AFC	PROJECT	REVISION	REFERENCE DRAWINGS	REFERENCE DRAWINGS
D	11/14/97	GDH					REVISED EXIST. WEIGH BELT. THEREFORE NEW LAYOUT.										
E	1/6/97	GDH					COMPLETELY NEW DESIGN										
F	9-7-00	JHB					GENERAL REVISION										

NO.	DATE	BY	APP.	APP.	AFC	PROJECT	REVISION	NO.	DATE	BY	APP.	APP.	AFC	PROJECT	REVISION	REFERENCE DRAWINGS	REFERENCE DRAWINGS

PROPRIETARY STATEMENT		ORIGINAL ISSUE APPROVALS	
SCALE	AS NOTED	APP.	APP.
DATE	10-7-97	APP.	APP.
BY	JBH	APP.	APP.
SITE		APP.	APP.
BLDG.		APP.	APP.
CHARGE		APP.	APP.
PROJ.		APP.	APP.

TITLE		
ORLANDO UTILITIES COMMISSION		
EQUIPMENT ARRANGEMENT - SECT'S & DET'S FOR PORTABLE SILO		
SIZE	DRAWING NUMBER	REV.
D	306-21-02	F

**CGS**  
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100 Baltimore Pike - Chadds Ford, PA 19317  
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