

cc Larry George
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Orlando Utilities Commission
Stanton Energy Center, Unit 1
Conference Memorandum 500-75

B&V Project 8927
B&V File 8927.15.0500
8927.32.0203
May 25, 1983

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

Attention: Mr. W. H. Herrington

Gentlemen:

Enclosed are three copies of our Conference Memorandum 500-75 covering our meeting of April 25, 1983, in Tallahassee, Florida with the Department of Environmental Regulation.

Very truly yours,

BLACK & VEATCH

E. C. Windisch 1088

E. C. Windisch

tjb
Enclosures

cc: Mr. C. H. Stanton, w/encl.
Mr. H. C. Luff, w/encl.
Mr. L. E. Stone, w/encl.
Mr. B. E. Shoup, w/encl.
~~Mr. H. S. Oven, w/encl.~~

Received DER

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CONFERENCE MEMORANDUM 500-75

Orlando Utilities Commission
Stanton Energy Center, Unit 1
Coal Sampling Requirements

B&V Project 8927
B&V File 8927.15.0500
32.0203
May 20, 1983

Conference held in the Department of Environmental Regulation offices in Tallahassee, Florida on April 25, 1983.

<u>Department of Environmental Regulation (DER)</u>	<u>Orlando Utilities Commission (OUC)</u>	<u>Black & Veatch (B&V)</u>
H. S. (Buck) Owen Larry George	B. E. Shoup	S. M. Day

Coal analyses for sulfur content must be taken at a coal processing facility if sulfur removal credit is to be taken for this processing. This meeting was held to discuss possible alternative methods of coal sampling. Requirements for a PSD permit extension were also discussed. The following items summarize the discussions held at the meeting.

1. The coal sampling requirements found in Reference Method 19, 40 CFR Part 60, Appendix A were discussed. Specifically Section 2 on the determination of sulfur dioxide removal efficiency of fuel pretreatment systems was discussed. This removal efficiency needs to be determined only if OUC desires to take credit for the coal preparation as part of the 70 (or 90) per cent sulfur dioxide removal requirement. Reference method 19 specifies that ASTM D2234-76, Type I, Conditions A, B, or C, or systematic spacing is to be used.
2. S. M. Day briefly described the coal supply arrangements that are currently being negotiated. These descriptions were for the Blue Diamond Coal Company's Scotia Reserves and the Golden Oak Mining Company's Elkhorn No. 3 and Hazard No. 4 coal. The various blends, transportation methods, and existing coal sampling facilities were briefly described.
3. The DER said that alternative methods of taking the coal sample would be considered as long as the proposed alternatives provided reasonable assurance that representative and accurate measurements were being made. The DER pointed out that the EPA would have final approval over any alternatives proposed to the specified sampling method. The DER said that details on truck load sizes, conveyor rates, processing rates, proposed sampling rates, etc., would be needed before an assessment could be made on any proposed alternative. Reasonable alternatives would be considered, however.

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4. Discussions were held regarding the possible need for an extension of the Stanton Energy Center, Units 1 and 2 PSD permit. Construction must commence before December 10, 1983 or else the permit must be extended.
5. The current procedure for an extension request is to submit the request along with the circumstances for the need for the permit extension to the DER. The DER will process the request and send it along with their recommendation to the EPA. The EPA will take final action on the request. The request should be made about six months prior to expiration.
6. Delay of the certification caused by the hearing officer and certification appeal process are appropriate reasons to request a permit extension. There should be no difficulty in obtaining an extension for the permit.
7. The DER may still be receiving conditional PSD authority before December 10. In that event, the DER will make final approval of the PSD permit extension. The holdup at EPA centers on a disagreement in the method the DER uses to calculate the combined PSD short-term impacts from two or more sources. The DER expects the EPA to shortly approve PSD authority subject to a condition on the short-term PSD increment calculations.

SMD:ch