From:	Osbourn, Scott
To:	Cascio, Tom
Subject:	FW: OUC Stanton-- TV Renewal Comments
Date:	Friday, August 01, 2014 10:00:20 AM
Attachments:	Replacement A.xx Condition.docx

FYI—I thought it might be helpful if you had this summary of the items we wanted to discuss today.

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From: Osbourn, Scott
Sent: Thursday, July 31, 2014 3:25 PM
To: Baez, David R. (DBaez@ouc.com); 'Kennedy, Susan Butler'
Cc: Tribby, Matthew
Subject: OUC Stanton-- TV Renewal Comments

David—attached is a revised page that Tom Cascio said should be inserted in our "preliminary" draft permit. He said that the page in the previous permit was actually a carry-over from the Crystal River permit. Therefore, if you need a one-year extension for MATS compliance, you'll need to submit a letter request. The other comments from our conference call of July 23, 2014 are as follows:

- The MATS extension request (if needed)
- EU021 - Surface coating and solvent cleaning – use example language provided by Golder
- EU041 (page 52) – 14.9 L/cyl is the total displacement, divided by 6 cylinders, it equals 2.48 L/cyl (i.e., <10 L/cyl threshold)
- AC Permit -040-AC (page 8) —also authorized SCR on Unit 1, which may still be done
- PM limit (page 10) – Unit 2 has exemption for SU/SD and malfunction; Unit 1 should have the same exemption language
- NSPS Subpart Da (page 11) —remove language associated with co-firing coal with a liquid fuel
- MATS Rule (page 13) – Hg limit 1.2 lb/TBtu should have a 30 day rolling average. Also, include "1.0 lb/TBtu with both units on a 90 day rolling average"
- Test Methods (page 16) – PM testing under MATS: use a "modified Method 5 (changes time for sampling and sampling rate); SAM – add Method 8A to 8 and CTM-013; Hg – add Method 29 to 101A and 30B
- Stanton A, Condition D.9(b) – the CT heat input rating is in HHV and the DB heat input rating is in LHV. It's requested that they both be in the same format (i.e., HHV).
- Rule 62297.310 and implications for a compliance plan in the permit

David-- regarding the above: Test Methods (page 16) – PM testing under MATS: use a "modified Method 5 (changes time for sampling and sampling rate); you were going to provide some ex ample language.

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From: Cascio, Tom [mailto:Tom.Cascio@dep.state.fl.us]
Sent: Thursday, July 24, 2014 7:46 AM
To: Osbourn, Scott
Subject: Correction

Hi Scott – please replace the attached text in place of the condition following A.16 in the draft Stanton permit. Thanks.

Tom

Tom Cascio, D.B.A., CPM, Sigma Xi
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