

Halpin, Mike

From: Halpin, Mike
Sent: Tuesday, October 30, 2001 7:35 AM
To: 'Waters, Glenn D.'; 'Reggie Davis'
Cc: Mulkey, Cindy; Kuberski, Garry
Subject: RE: Stanton A CEM Issues

Dwain Waters-

Here are my responses, in CAPITAL LETTERS (after the questions) to the CEMS questions Spectrum has raised (which I have left below), related to the recently issued Stanton Unit A PSD permit:

1. The permit says that CO₂ will be the diluent for both NO_x and CO. This is currently not the case. O₂ is being used as a diluent for the CO system. Will this be allowed or do we need to see about a having a CO₂ monitor for that diluent as well. I was surprised to see the diluent spelled out as usually they give you the choice of using CO₂ or O₂.

O₂ WILL BE ALLOWED

2. The CO₂ monitor is to be RATA'd using Method 3B. This is not the normal reference method for CO₂, usually method 3A is utilized. Method 3B is for determining excess air and uses an ORSAT. Method 3A is much more accurate, it uses a CO₂ monitor, and is typically used for RATA testing under part60 and part75.

METHOD 3A IS ALLOWED

3. The CO monitor will be ranged 0-20ppm for the low range and 0-100 for the high range. This meets the requirements of permit as you can see from the language. The 0-20 is low end for the Siemens analyzers and the 0-100 is a permit cap.

NO RESPONSE REQUIRED, AS THIS MEETS THE PERMIT REQUIREMENTS

4. NO_x will be ranged 0-10 low and 0-30 high.

NO RESPONSE REQUIRED, AS THIS MEETS THE PERMIT REQUIREMENTS

5. The language regarding conversion of the wet based numbers to dry based is somewhat confusing. This is the way we have done this to date and it appears to work well at Dahlberg. We use a set of formulas that were actually developed between Gainesville Regional Utilities and Spectrum but are right out of the CFR. Clark Mitchell is very familiar with these. Estimating moisture will not give as accurate a number I do not believe.

I CANNOT DETERMINE WHETHER THERE IS A QUESTION HERE FOR FDEP, HOWEVER FOR CLARITY THE PERMIT (SPECIFIC CONDITION 41) STATES: "If the CEM system measures concentration on a wet basis, the CEM system shall include provisions to determine the moisture content of the exhaust gas and an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). Alternatively, the owner or operator may develop through manual stack test measurements a curve of moisture contents in the exhaust gas versus load for each allowable fuel, and use these typical values in an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). Final results of the CEM system shall be expressed as ppmvd, corrected to 15% oxygen."

These issues will ultimately require a revision to the PSD permit. However, you may assume that this e-mail represents FDEP's official responses to your questions, such that you can procure necessary equipment. Invariably, we find that permittee's need to make minor, incidental changes to permits as construction is commenced and continues. "OUC/KUA/FMPA/Southern Company - Florida, LLC" will need to ensure that the changes above, along with other incidental construction changes, are included within the PSD permit, prior to the completion of construction.

Michael P. Halpin
FDEP/BAR

10/30/2001



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

JUN 18 2001

RECEIVED

JUN 21 2001

BUREAU OF AIR REGULATION

4APT-ARB

Al Linero, P.E.
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

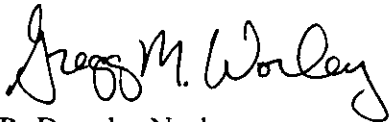
Thank you for sending to the U.S. Environmental Protection Agency (EPA) a copy of the preliminary determination and draft prevention of significant deterioration (PSD) permit for a project at the Curtis H. Stanton Energy Center in Orange County, Florida. The proposed project will consist of two combined cycle combustion turbine units. The following equipment is associated with the project: two General Electric (Model PG7241FA) combined cycle combustion turbines with heat recovery steam generators, supplemental duct firing, a 10-cell cooling tower, and a No. 2 distillate fuel oil storage tank. Natural gas will be the primary fuel for each unit, with No. 2 fuel oil as a backup. Based on the applicant's emission estimates, the pollutants subject to PSD review are nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and volatile organic compounds (VOC).

We have reviewed the preliminary determination and draft permit and have the following comments. These comments were discussed by telephone with Mr. Mike Halpin of the Florida Department of Environmental Protection (FDEP) on June 5, 2001.

1. Condition 30 in the draft permit (page 10 of 20) requires testing to confirm the accuracy of formaldehyde emission estimates for the combustion turbines/duct burners. Since the applicant used a formaldehyde emission factor that is far below the nominal AP-42 emission factor and thereby avoided a section 112(g) case-by-case maximum achievable control technology determination, EPA agrees that a performance test is appropriate.
2. Condition 21 in the draft permit (page 8 of 20) specifies NO_x emission limits on a 3-hour block average basis. A compliance averaging period of 3 hours for NO_x emissions has been specified in many combined cycle combustion turbine permits and is appropriate.

If you have any questions regarding these comments, please call Daphne Wilson at (404) 562-9118.

Sincerely,


for R. Douglas Neeley

Chief

Air and Radiation Technology Branch

Air, Pesticides and Toxics

Management Division

cc: M. Halpin
C. Holladay
R. Moore, Gulf Power
G. Vick, Gulf Power
R. Unruh, Black & Veatch
G. Beatty, NPS
J. Kozlov, CD
J. Buford
B. Owen, DEP

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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MAY 31 2001



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BUREAU OF AIR REGULATION

May 30, 2001

Mr. Mike P. Halpin
Bureau of Air Regulations
Florida Department of
Environmental Protection
MS #5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Halpin:

Pursuant to Chapter 50, Florida Statutes, the Public Notice of the intent to issue PSD Permit No. PSD-FL-313 for the Curtis H. Stanton Energy Center Unit A was published in the Orlando Sentinel on May 27, 2001.

Attached is the proof of publication as received from the Orlando Sentinel on May 29, 2001.

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

Very truly yours,

Robert F. Hicks
Sr. Environmental Engineer

RFH:rc
Attachment

xc: D. M. Stalls
Myron Rollins, B&V
James O. Vick, Gulf Power
Tasha O. Buford, YVAV&B

i:\secapsdpublicnotice

C. Holladay
J. Kaylor, CD
B. Olson, DEP
EPA
NPS

Orlando Sentinel

Published Daily

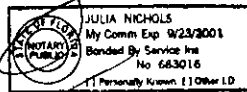
State of Florida } S.S.
COUNTY OF ORANGE }

Before the undersigned authority personally appeared BEVERLY C. SIMMONS who on oath says that he/she is the Legal Advertising Representative of Orlando Sentinel, a daily newspaper published at ORLANDO County, Florida; that the attached copy of advertisement, being a PUBLIC NOTICE OF PSD-FL-313 (PA 81-14542) in the matter of PSD-FL-313 (PA 81-14542) Court, in the ORANGE County, Florida, was published in said newspaper in the issue of 05/27/01

Affiant further says that the said Orlando Sentinel is a newspaper published at ORLANDO County, Florida, and that the said newspaper has heretofore been continuously published in said ORANGE County, Florida, each Week Day and has been entered as second-class mail matter at the post office in ORLANDO County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

The foregoing instrument was acknowledged before me this 29th day of MAY, 2001, by BEVERLY C. SIMMONS who is personally known to me and who did take an oath.

(SEAL)



PUBLIC NOTICE OF INTENT TO ISSUE PSD PERMIT
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. PSD-FL-313 (PA 81-14542)
OUC Curtis H. Stanton Energy Center
Unit A Combined Cycle Addition
Orange County

The Department of Environmental Protection (Department) gives notice of its intent to issue a PSD permit to the following joint owners: OUC/KUAF/MPA/Southern Company - Florida, LLC. The permit is to install combined cycle power generating unit at the existing OUC Stanton Energy Center, located at 5100 South Alafaya Trail, Orlando, Orange County. A Best Available Control Technology (BACT) determination was required pursuant to Rule 62.112-400, F.A.C. and 62.102-21 for emissions of particulate matter (PM and PM10), volatile organic compounds (VOC), sulfur dioxide (SO2), sulfuric acid mist (SAM), carbon monoxide (CO) and nitrogen oxides (NOx). The applicant's name and address is: Robert B. Myers, Salt Power Company, One Energy Place, Pensacola, FL 32504-0228.

The project consists of two nominal (existing) 170 MW GE TF6 combustion turbine-electrical generators configured for combined cycle operation, operating on natural gas with 0.05% sulfur oil backup (1000 hours per year); two supplementary-fired (natural gas) heat recovery steam generators (HRSG), 80 MW (nominal output) steam boiler, one fresh water cooling tower; a fuel oil storage tank and ancillary equipment.

NOx emissions will be controlled by Dry Low NOx combustors and SCR to 1.5 parts per million (ppm) while firing natural gas, and by water injection and SCR to 10 ppm while firing fuel oil. Emissions of carbon monoxide (CO) will be controlled to 14 ppm while firing oil and 17 ppm while firing gas. Emissions of volatile organic compounds (VOC), sulfur dioxide (SO2), sulfuric acid mist (SAM), and particulate matter (PM/PM10) will be very low because of the inherently clean fuels and methods of combustion employed.

The following maximum potential annual emissions (in tons per year) summarize the maximum increase in respirable air pollutants as a result of this project.

Pollutant	Maximum Facility Emissions (Tpy)
PM10	128
PM2.5	134
SO2	134
SAM	18
VOC	106
CO	373

An air quality impact analysis was conducted. Emissions from the facility will not contribute to or cause a violation of any state or federal ambient air quality standards. All impacts to Class I areas are less than significant. All impacts to Class II areas are also less than significant. The Department will issue the FINAL permit with the attached conditions and after approval of the certification pursuant to the Florida Power Plant Siting Act (Sections 403.501-519, F.S.) unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for a public meeting concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of "Public Notice of Intent to Issue PSD Permit." Written comments should be provided to the Department's Bureau of Air Regulation, 1600 Star State Road, Mail Station 5505, Tallahassee, FL 32399-1400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. before the deadline for filing a petition. If a petition for an administrative hearing on the Department's intent to issue is filed by a substantially affected person, that hearing shall be consolidated with the certification hearing, as provided under Section 403.501(3). The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of 3900 Commonwealth Boulevard, Mail Station # 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28.106-205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28.106-201.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department or the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Original Departmental Proceedings	Page of Environmental Protection
Bureau of Air Regulation	Central Office
111 S. Magnolia Drive, Suite 4	111 S. Magnolia Drive, Suite 412
Tallahassee, Florida 32304	Orlando, Florida 32803-1947
Telephone: (904) 497-1222	Telephone: (407) 496-1511
Fax: (904) 497-1222	Fax: (407) 496-1511

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32304; or call (904) 497-1222, for additional information. The Technical Evaluation and Preliminary Determination as well as the Draft BACT Determination and Permit may be viewed at <http://www8.floridadep.com/consent/permits/permitsenviro/psd/psdpermit.html> by clicking on Utilities and Other Facilities Permits Issues.

CDR3912536 5/27/01