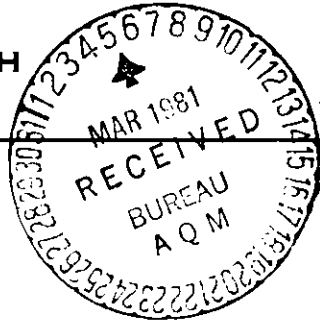


**BLACK & VEATCH**  
CONSULTING ENGINEERS

TEL. (913) 967-2000  
TELEX 42-6263



1500 MEADOW LAKE PARKWAY  
MAILING ADDRESS: P.O. BOX NO. 8405  
KANSAS CITY, MISSOURI 64114

Orlando Utilities Commission  
Stanton Energy Center  
PSD Analysis

B&V Project 8927.SCP  
B&V File 8927.32.0203  
February 25, 1981

Department of Environmental Regulation  
Montgomery Building  
2562 Executive Center Circle, East  
Tallahassee, Florida 32301

Attention: Mr. Larry George

Gentlemen:

As a result of recent telephone discussions between Larry Alfred (B&V) and Lou Nagler (EPA Region IV) and between Larry Alfred and Larry George (FDER), we are including in this letter our intended general plan for the PSD air modeling effort for the proposed Orlando Utilities Commission (OUC) Stanton Energy Center Units 1 & 2. The areas of interest in this letter are the assessment of impacts from OUC stack plumes and fugitive dust sources, with respect to NAAQS and PSD increments. Also of interest are contributions of other sources which could effect the PSD increments in the area of the plant site. The following is a list of specific points resulting from the above telephone conversations.

1. Florida has been delegated PSD authority and this PSD application will be filed with Florida DER.
2. The only sources other than Stanton Units 1 & 2 that must be addressed in the PSD analysis are those that are within 50 kilometers of the proposed site and on the PSD inventory list supplied by EPA.
3. These must be identified in the analysis but not necessarily modeled.
4. There are four sources that fulfill the criteria in item 2 and will be included in the analysis.

- OK for applic. →
- Florida Power & Light Coal preparation plant at Sanford
  - Reedy Creek Incinerator at Lake Buena Vista
  - Trans Gulf Pipeline Tank facility at Midway
  - Trans Gulf Pipeline Petroleum facility at Kissimmee

There are no other new PSD applications on file for this general area.

Orlando Utilities Commission  
Stanton Energy Center  
PSD Analysis

2

B&V Project 8927.SCP  
February 25, 1981

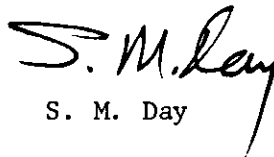
5. Florida Power & Light's Sanford Unit 4 and Canaveral plant have variances from FDER for increased particulate emissions. It is our understanding that these expire prior to operation of the Stanton Energy Center units. Therefore, the increased particulate emissions resulting from the variances will not be included in the analysis as PSD increment consumers.
6. Single source CRSTER, multiple source CRSTER, MPTER, and ISC (rural) are all appropriate dispersion models for use in the analysis.
7. Five years of meteorological data will be used in the modeling study. The data set is for the years 1974 to 1978 and includes surface data from Orlando and mixing depths from Tampa. All missing values in the upper air data have been replaced by interpolation in accordance with EPA Region IV guidance.
8. On-site monitored air quality data is suitable for establishing baseline values for assessment against the NAAQS. Discussion of representativeness of data to the site will be included in the application.
9. Impacts resulting from fugitive dust emissions from the coal handling and storage facilities will be estimated using the ISC model and one year of meteorological data.

The modeling effort for the PSD application will follow the plan as outlined above. If you have any revisions or modifications to this plan that you believe must be implemented in order to develop an acceptable PSD application, we would appreciate an early response to this letter.

If you have any questions or comments with regard to this matter, please contact Larry Alfred.

Very truly yours,

BLACK & VEATCH

  
S. M. Day

LRA/cmc

cc: Mr. Lou Nagler, EPA Region IV