

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



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GM*

BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

November 19, 1981

Mr. B. E. Shoup
Orlando Utilities Commission
Post Office Box 3193
Orlando, Florida

Dear Mr. Shoup:

The Bureau of Air Quality Management has prepared the following comments to your letter of October 29, 1981:

The replies are in numeric sequence with the questions asked.

1. The applicant (OUC) requests the BACT determination for unit No. 1 also apply to unit No. 2, subject to later re-evaluation. Unit No. 2 is scheduled to commence construction in July 1990.

The BACT determination to which the applicant refers is valid for Site Certification purposes only and, therefore, cannot be extended to include unit No. 2. The Site Certification Application covers unit No. 1 only.

In the federal PSD permit for units No. 1 and No. 2, a BACT determination for unit No. 2 will be made, subject to the phased construction provisions of 40 CFR 52.21(j)(4). This BACT determination will be included as part of the Department's Preliminary Determination regarding the application for a federal PSD permit (PSD-FL-084).

2. The date of receipt of the BACT application as indicated on Page 2 of the determination is the date the BACT coordinator received the information. This date does not affect any time schedule (clock) for site certification or permitting.

3. The applicant has indicated a worst case coal analysis of 4.46% sulfur content with a heat content of 10,813 Btu per pound. The emission limit for SO₂ determined as BACT is 0.76 pounds per million Btu heat input. The applicant contends this SO₂ limit removes two coal sources from the 38 available for use. Based upon AP-42 emission factors, the SO₂ emission limit for the worst cast coal would be 0.78 pound per million Btu.

The review group does not believe the difference of 0.02 lb/million Btu on a 30-day rolling average will result in the applicant being denied coal purchase flexibility. The SO₂ emission limit determined as BACT agrees with Department determinations for JEA and TECO.

4. The applicant objects to the CO emission limit of 0.05 pounds per million Btu on the basis that the actual CO emissions are currently unknown. The BACT review group recognizes that combustion control requirements must be a balanced trade-off between NO_x and CO emissions through the use of a flue gas oxygen monitor. The review group also points out that actual emissions for all the pollutants are currently unknown but are estimated from AP-42 and/or from actual similar source test results.

The BACT review group, therefore, recommended a CO emission limit equal to a previous determination for JEA which is 0.05 lbs. CO per million Btu heat input.

5. This was a statement not requiring a response.

6. The applicant has requested the visible emissions (VE) limitation of 5% opacity for coal, limestone, and flyash handling systems be changed to 20% opacity. The 5% opacity or no visible emission limitation is attainable using available technology. The review group recommends the 5% opacity limit be retained.

7. This was a statement not requiring a response.

Sincerely,

Hamilton S. Owen, Jr.

Hamilton S. Owen, Jr., P.E.
Administrator
Power Plant Siting