

August 1, 1981

Mr. B. E. Shoup
Orlando Utilities Commission
Post Office Box 3193
Orlando, Florida 32802

Dear Mr. Shoup:

The Bureau of Air Quality Management has raised the following questions and issues concerning Stanton Units 1 and 2. The comments relate to both Site Certification and the federal PSD permits.

- 1) The proposed boiler will use No. 6 fuel oil for start-up, low load operation, and flame stabilization. Please evaluate SO₂ and particulate emissions and the emission controls while burning fuel oil. What is the maximum sulfur content of the fuel oil that will be used in Unit No. 1?
- 2) Please estimate fugitive coal dust emission rates for all the Sources of Emissions listed in Table 3.2-2.
- 3) Please estimate fugitive limestone dust emission rates for all the Sources of Emissions listed in Table 3.9-1.
- 4) What is the maximum quantity of gas bypassing the FGD system?
- 5) Please address carbon monoxide and fluoride emissions from each unit. A BACT analysis is required for CO emissions. A material balance on fluoride is requested. If emissions exceed

the significant level, a BACT will be required for this pollutant.

- 6) For information only, please provide a summary of the NO, NO_x, and IP onsite measurements which you consider valid and representative.
- 7) Please provide precise (± 10 m) UTM coordinates of each emission point, if known at this time, or approximate (± 50 m) UTM coordinates of one point and relative (x,y) coordinates of the others.
- 8) Please provide copies of all final model runs (CRSTER and ISC output) showing input data, receptor locations, and principle output tables for the two unit case.
- 9) For purposes of the federal PSD permit, please provide an analysis of the air quality impact projected for the area as a result of general commercial, residential, industrial, and other growth associated with the plant.

If you have any questions of items (1-5), contact Bill Thomas or Bob King. For items (6-9), contact Larry George in the Bureau of Air Quality Management.

Sincerely,

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

HSO:sb