ORLANDO UTILITIES COMMISSION
500 SOUTH ORANGE AVENUE • P. O. BOX 3193 • ORLANDO, FLORIDA 32802 • 305/423-9100

October 29, 1981

Mr. H. S. Oven
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Buck:

A Best Available Control Technology Determination (BACT)was signed on August 28, 1981 for the proposed Curtis H. Stanton Energy Center. OUC has reviewed the determination and provides the following comments.

1. Unit 2 Determination

The BACT determination should be made for Unit 2 as well as for Unit 1. The application is for a two unit phased construction permit as described in the Introduction to the Site Certification Application. The proposed BACT for Unit 2 is identical to Unit 1. OUC believes that a phased construction permit is essential to protect OUC's investments being made in common facilities which will serve Unit 2 as well as Unit 1. OUC also understands that the BACT determination for Unit 2 will be reexamined under the current rules prior to its start of construction. Therefore, OUC requests again that the BACT determination for Unit 2 be made (subject to later reevaluation) as requested in the PSD permit application.

2. Date of Receipt of Application

The date of receipt of the BACT application was not July 9, 1981 as indicated on Page 2 of the BACT determination. The application was part of the Site Certification Application submitted on May 18, 1981 and accepted as complete for filing on May 26, 1981.

3. BACT for SO_2 - Steam Generator

The BACT determination requested was identical to NSPS. The BACT determination made by the DER was more stringent than NSPS at 0.76 pounds/10^6 BTU heat input. OUC has examined the sulfur content and heat content of the 38 coals which were bid to OUC for combustion in the unit. The limit of 0.76 would eliminate two of these coals unnecessarily. The low heat content of the worst bid coal is 10,813 BTU/pound. The high sulfur content is 4.46%. This would yield uncontrolled emissions of 8.25 pounds of $SO_2/10^6$ BTU heat input. OUC would like to maintain flexibility in fuel selection so that the most economical energy can be produced. An emission limit of 0.83 pounds $SO_2/10^6$ BTU heat input (30 day rolling average) would include these other two coals and would provide OUC with the flexibility needed. OUC therefore requests that the DER reconsider its BACT determination of SO_2 for the steam generator to a level of 0.83 rather than 0.76.

4. BACT for CO - Steam Generator

The BACT determination by the DER was 0.05 pounds $CO/10^6$ BTU heat input. As you are aware, emission measurements for CO are almost nonexistent. The emission rates which would actually occur from the facility are currently unknown. Because of this lack of information, no CO emission guarantee can be obtained from our boiler manufacturer. In view of this lack of emission data, OUC must object to the imposition of a CO emission limit as part of the BACT determination.

5. BACT for Fluorides

OUC has determined that Fluoride emissions may potentially exceed three tons per year and hence may require a BACT determination. More detailed information on Fluoride emissions is being developed and will be submitted shortly.

6. BACT for Opacity - Coal, Limestone, and Flyash Handling Systems

The BACT determination made by the DER for coal, limestone, and flyash handling systems for opacity is 5% maximum. The NSPS for coal processing plants is 20% and, while no NSPS exists for the other facilities, OUC believes that a BACT of 20% opacity is the proper determination for emissions from these facilities and requests a reevaluation of this BACT determination.

7. Other BACT Matters

OUC is still reviewing other portions of the BACT determination and may be submitting additional comments prior to the BACT hearings.

Please advise me as to the proper procedure for obtaining the reevaluations requested in this letter. By copy of this letter, Steve Smallwood, Victoria Tschinkel, and the other members of the BACT Review Group are being advised of OUC's request.

Sincerely yours,

B. E. Shoup

B. E. Shoup
Director
Environmental Division

BES/jh

cc: Mr. C. H. Stanton
Mr. H. C. Luff
Mr. L. E. Stone
Mr. W. H. Herrington
Mr. J. T. Gurney, Sr.
Mr. T. B. Tart
Mr. E. C. Windisch
Mr. S. M. Day
Ms. V. Tschinkel
Mr. S. Smallwood
Mr. C. Collins
Mr. R. King
Mr. Larry George