

File Barbara

# Department of Environmental Protection



Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

October 16, 2000

Mr. Frederick F. Haddad, Jr.  
Vice President, Power Resources Business Unit  
Orlando Utilities Commission  
500 South Orange Avenue  
P.O. Box 3193  
Orlando, Florida 32802


Re: Request for Permit Exemption for New 25-ton Silo

Dear Mr. Haddad:

We are in receipt of your letter, dated September 21, requesting a conditional exemption from construction permitting per 62-4.040, Florida Administrative Code (F.A.C.), for the construction of a 25-ton lime silo and back-up feed system. After reviewing your submittal and verifying your calculations, it is the Department's opinion that an exemption from construction permitting is not needed since this project qualifies for a generic permit exemption pursuant to Rule 62-210.300(3)(b)1., F.A.C. Under the provisions of this rule, an emissions unit that emits less than 5 tons of a regulated pollutant is exempt from the permitting requirements of Rules 62-210, 62-212, and 62-4, F.A.C.

Pursuant to Rule 62-213.430(6)(a), F.A.C., "Emissions units or activities, which are added to a Title V source after issuance of a permit under this chapter, shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify as insignificant pursuant to this rule."

Based on these rules, there is no permitting requirement at this time. As long as the potential emissions do not change from those outlined in your request, you may wait until the Title V permit renewal to incorporate this unit into the insignificant emissions unit appendix. Please notify the Department before operating this unit in a manner that would increase the potential emissions above those submitted. If you should have any questions regarding this correspondence, please contact Jonathan Holtom, P.E. at (850) 921-9531, or write to me at the above letterhead address.

Sincerely,  
  
Scott M. Sheplak, P.E.  
Administrator  
Title V Section

CHF/sms/h

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

RECEIVED

SEP 28 2000

BUREAU OF AIR REGULATION



*The Reliable One*

Certified Mail No. 7000 0600 0027 0641 1503  
Return Receipt Requested

September 21, 2000

Mr. Scott M. Sheplak, P. E., Administrator  
Title V Section  
Division of Air Resources Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road - MS 5500  
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

In December 1997, OUC received departmental approval for a modification to the Conditions of Certification for Stanton Energy Center Units 1 and 2 allowing the facility to substitute off-site flyash/lime for use in the wet scrubber sludge stabilization process. This material has been successfully incorporated into the standard operating procedures of the plant for the past two years.

To assure system reliability, the plant is proposing the installation of a 25-ton silo and backup lime feed system. This would be used as a make-up lime system and backup during the period of time when the off-site flyash/lime material is unavailable. The attached diagram includes the proposed equipment arrangement and baghouse emission worksheet for the proposed baghouse. Based on the calculations the annual emissions would be .012 tons/year.

OUC is requesting a conditional exemption from a construction permit, per 62-4.040, and the addition of this emission source to the list of Insignificant Emissions in the facility's Title V permit. If you require further information on this request, please contact Denise Stalls at 407-423-9141. Your assistance on this matter is appreciated.

Sincerely,

Frederick F. Haddad, Jr.  
Vice President  
Power Resources Business Unit

FFH:rc  
Enclosures

I:\FDEP25tonsiloSEC

**CGS**

**Engineering Services Inc.**  
100 Baltimore Pike  
Chadds Ford, PA 19317  
Telephone (610) 558-1177  
Fax (610) 558-1207

REGISTERED  
SEP 18 2000

September 14, 2000  
VFL Technology Corporation  
16 Hagerty Boulevard  
West Chester, Pa. 19382-7594

Attn.: Mr. Gernot Jobst

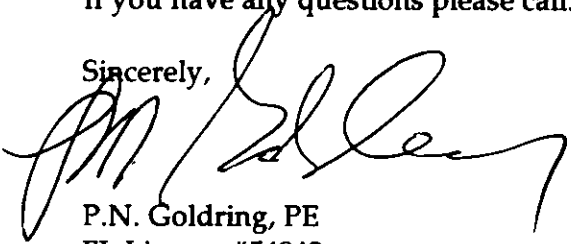
Re: Baghouse Emission Calculations for Orlando Power

I have reviewed the calculations for the particle emissions from the Belgrade Steel Tank Dust House Model 225.

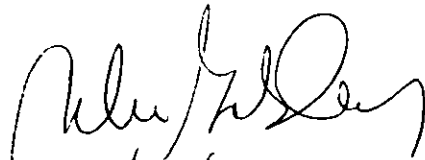
They are satisfactory. The Emission Worksheet is attached

If you have any questions please call.

Sincerely,



P.N. Goldring, PE  
FL License #54942

  
9/14/2000

## Baghouse Emmission Worksheet

**Manufacturer and Model:** Belgrade Steel Tank "Belle" Dust House Model 225

**Specify:** XXX            **Baghouse**  
           **Cartridge**  
           **Other, Specify**

**Number of Bages or Cartridges:**            18

**Total Bag or Cartridge Area:**            370 (ft<sup>2</sup>)

**Maximum Capacity:**            675 (ACFM)

**Air to Cloth Ratio:**            1.82432:1

---

**A) From AP42 - Cement Unloading (Pnuematic)**

Uncontrolled Emission:            0.27 (lbs PM/ton)  
Filterable Particulate Matter (PM) Before Filter

**B) Application**

Loading of 25 tons of material takes 1 hour = 25 tons/hour

Particulate Matter before Filter:  
25 tons/hour x 0.27 lbs PM/ton = 6.75 #/Hr PM before Filter

Daily Material Requirements:            25 Tons

**C) From Manufacturer**

Filter Efficiency: 99% for PM 1.2 micron or greater

Hourly Loading: 6.75 lbs/hour x 0.01 = 0.0675 lbs/hour

Daily Loading: 6.75 lbs/day x 0.01 = 0.0675 lbs/day.

*John P. Kelley*  
9/14/2000