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BUREAU OF AIR REGULATION

April 23, 2008

Ms. Trina Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

Re: Orlando Utilities Commission (OUC)
Curtis H. Stanton Energy Center - Unit B Project
Comments on Draft PSD Permit No. PSD-FL-373A

0950137-020-AC

Dear Ms. Vielhauer:

On March 25, 2007, the Department issued a draft PSD permit to OUC for the installation of a combined cycle combustion turbine project (Unit B) planned for the Curtis H. Stanton Energy Center. OUC would appreciate your consideration of the following comments on the draft PSD permit:

Comment No. 1 – Duct Burner Nominal Heat Input Capacity

The draft permit indicates the nominal heat input rating of the heat recovery steam generator (HRSG) duct burners in several locations; i.e., on Pages 2, 5, and 6. The HRSG duct burners, which were purchased and designed for the prior Unit B integrated combined cycle gasification (IGCC) project, have a nominal heat input design rating of 531 MMBtu/hr. Accordingly, revisions to the draft permit to indicate a duct burner nominal heat input rating of 531 MMBtu/hr for each occurrence on Pages 2, 5, and 6 are requested.

Comment No. 2 – Combustion Turbine Inlet Air Evaporative Cooling

The combustion turbine inlet air evaporative cooling system is described in Condition 12.c. – *Inlet Fogging*. Since “inlet fogging” differs technically from “evaporative cooling”, replacement of the current Condition 12.c. language with the following language is requested:

Evaporative Cooling: Evaporative cooling is the passing of gas turbine compressor inlet air through a wetted media, which reduces the inlet air temperature through evaporative cooling. Lower compressor inlet temperatures result in a more mass flow rate through the gas turbine with a boost in electrical power production. The emissions performance remains within the normal profile of the gas turbine for the lower compressor inlet temperatures. Evaporative cooling may be implemented at ambient temperatures of 60° F or higher.

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Comment No. 3 – Ammonia Slip Test Methods

The following correction to Condition 13.E is requested:

- e. Compliance with the ammonia slip standard shall be demonstrated by conducting tests in accordance with EPA Method CTM-027 ~~and~~ or EPA Method 320.

Comment No. 4 – CO CEMS Monitoring

Revisions to Condition 24 regarding CO CEMS monitoring are requested as follows:

24. Continuous Compliance: The permittee shall demonstrate compliance with the 24-hour and annual average CO and NO_x-emission standards, and with the 24-hour average NO_x emission standard, based on data collected by the certified CEMS. [Remainder of Condition No. 24 is unchanged].

Comment No. 5 – Monitoring of Capacity

Revision to Condition No. 29 to clarify the units of the required operating rate monitoring is requested as follows:

29. Monitoring of Capacity: The permittee shall monitor and record the operating rate (in units of MMBtu/hr) of the CTG and HRSG... [Remainder of Condition No. 29 is unchanged].

Comment No. 6 – Stack Height

The PSD permit application and dispersion modeling analyses submitted to the Department indicated a height of 205 feet for the combustion turbine/heat recovery steam generator stack. This stack height, originally premised for the Unit B IGCC project, is mentioned in two locations in the draft PSD permit.

Further evaluation of the stack design for the proposed Unit B natural gas (primary fuel) and ULSD fuel oil (backup fuel) combined cycle project has resulted in a stack height of 165 feet. PSD Class II modeling using the lower 165 feet stack height demonstrates that maximum project impacts will remain well below the Class II significant impact levels (SILs). Air quality impacts at the distant Chassahowitzka National Wilderness Area will also remain well below the PSD Class I SILs. The dispersion model input and output files, and a summary of the model results have been provided to the Department.

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Since maximum project air quality impacts remain well below the PSD Class I and II SILs, OUC requests revisions to the draft PSD permit to show a CT/HRSG stack height of 165 feet for each occurrence on Pages 1 and 2.

Your consideration OUC's comments on the draft PSD permit for Unit B is appreciated. Please contact me at 407/737-4236 if you have any questions regarding our comments.

Sincerely,

A handwritten signature in cursive script that reads "Denise M. Stalls".

Denise Stalls, Vice President
Environmental Affairs