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Orlando Utilities Commission
Stanton Amendments

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B&V Project 143799
February 2, 2007

Mr. Michael Halpin, P.E.
Siting Coordination Office
Florida Department of Environmental Protection
2600 Blair Stone Road
Suite 649, MS-48
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

Subject: Amendment Requests
Stanton Energy Center

Dear Mr. Halpin:

Black & Veatch, on behalf of the Orlando Utilities Commission (OUC), requests per this application, the Department consider amending the Curtis H. Stanton Energy Center Site Certification (PA 81-14) to allow installation of a rail siding, railcar maintenance facility, fly ash blending operations, and use of pet coke/PRB in Units 1-2. These activities are described in further detail in the attached requests (Requests 8-11).

As the Department is aware, this is the fourth submittal for a number of projects that OUC is considering which are focused on improvements at or related to the Stanton facility. The first submittal (Requests 1-2) to the Bureau of Air Regulation on September 1, 2006, concerned the addition of a dibasic acid (DBA) additive system and a neural network-based combustion optimization system on Units 1 and 2. These requests were approved as modifications. The second submittal (Requests 3-4) on November 14, 2006, concerned reconductoring of the Curry Ford to Stanton transmission line and a culvert installation across the Stanton railroad corridor. These requests were approved as amendments. The third submittal (Requests 5-7) on December 14, 2006, concerned a scrubber upgrade, low NO_x burners, and forced oxidation on Units 1-2. These requests are in processing awaiting submittal of a supporting air permit application, which is included herein as Request 12.

OUC appreciates the opportunity to work with the Department in obtaining the required approvals for improved operations at the Stanton Energy Center. Should you have any questions or concerns regarding this submittal, please do not hesitate to contact me at (913) 458-7563 or Denise Stalls of OUC at (407) 737-4236.


Sincerely,

Mike Soltys
Site Certification Coordinator

Enclosures

cc: Fred Haddad, OUC
Denise Stalls, OUC
Buck Oven, FDEP
Myron Rollins

Professional Engineer Certification

1. Professional Engineer Name: Larry Todd Newland Registration Number: 64188
2. Professional Engineer Mailing Address... Organization/Firm: Black & Veatch Street Address: 11000 Regency Parkway, Suite 100 City: Cary State: NC Zip Code: 27518
3. Professional Engineer Telephone Numbers... Telephone: (919) - 462-7415 ext. Fax: (919) - 468-9212
4. Professional Engineer Email Address: newlandlt@bv.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature  Date 01-26-2007 (seal)

* Attach any exception to certification statement.