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**Orlando Utilities Commission** Stanton Amendments

**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 ALL 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<sub>x</sub> 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 Soltvs

Site Certification Coordinator

Mike Solly

**Enclosures** 

CC:

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

## Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

- 1. Owner/Authorized Representative Name: Denise M Stalls, VP, Environmental Affairs
- 2. Owner/Authorized Representative Mailing Address... Organization/Firm: Orlando Utilities Commission

Street Address: P.O. Box 3193

City: Orlando

State: FL Zip Code: 32802

3. Owner/Authorized Representative Telephone Numbers...

Telephone: (407)737-4236 ext. Fax: (407) 384-4062

- 4. Owner/Authorized Representative Email Address: dstalls@ouc.com
- 5. Owner/Authorized Representative Statement:

I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.

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1/26/07

DEP Form No. 62-210.900(1) - Form

Effective: 2/2/06

Pr	ofessional 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
3	City: Cary State: NC Zip Code: 27518  Professional Engineer Telephone Numbers
]	•
4.	Telephone: (919) - 462-7415 ext. Fax: (919) - 468-9212  Professional Engineer Email Address: newlandlt@bv.com
5.	Professional Engineer Statement:
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	I, the undersigned, hereby certify, except as particularly noted herein*, that:
	(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
	(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.
	(3) If the purpose of this application is to obtain a Title V air operation permit (check here , 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.
	(4) If the purpose of this application is to obtain an air construction permit (check here , 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 , 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.
	(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 , 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.
	2020 201.26.2007
ر	Signature Date

DEP Form No. 62-210.900(1) - Form

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<sup>\*</sup> Attach any exception to certification statement.