


Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer
FROM: Al Linero 
DATE: September 10, 2007
SUBJECT: Orlando Utilities Commission (OUC) – Stanton Energy Center
Forced Oxidation Project - Units 1 & 2
DEP File No. 0950137-014-AC

Attached is the Intent to Issue package for the installation of forced oxidation equipment on the wet flue gas desulfurization equipment for OUC Stanton Units 1 and 2.

The forced oxidation equipment injects air through a grid under the surface of the liquor within the bottom of the scrubber vessels. The purpose is to encourage further precipitation on gypsum crystals rather than on scrubber internal surfaces. The process will cause greater conversion of calcium sulfite to gypsum.

The present sulfite/gypsum sludge waste is combined with hydrated lime and fly ash and disposed on-site. No plans have been announced to further process and sell the gypsum from the improved process and, as of now, they intend to continue on-site disposal.

There should be no increase in emissions from the forced oxidation project.

I recommend your approval of the attached Intent to Issue.

AAL/aal

Attachments



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

September 11, 2007

Electronically Sent – Received Receipt Requested.

Ms. Denise Stalls DStalls@ouc.com
Vice President Environmental Affairs
Orlando Utilities Commission
500 South Orange Avenue
Post Office Box 3193
Orlando, Florida 32802

Re: DEP File No. 0950137-014-AC
Curtis H. Stanton Energy Center
Forced Oxidation Project

Dear Ms. Stalls:

Enclosed is one copy of the Draft Air Construction Permit to install forced oxidation equipment on the wet flue gas desulfurization scrubber for Units 1 and 2 at the Curtis H. Stanton Energy Center in Orange County. The Department's Intent to Issue Air Construction Permit, the Technical Evaluation, and the "Public Notice of Intent to Issue Air Construction Permit" are also included.

The Public Notice must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to the requirements of Chapter 50, Florida Statutes. Proof of publication, such as a newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in denial of the permit modification.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. A.A. Linero, Program Administrator, at the letterhead address. If you have any questions regarding this matter, please contact Mr. Linero at (850) 921-9523.

Sincerely,

Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/aal

Enclosures

In the Matter of an
Application for Permit by:

Orlando Utilities Commission (OUC)
Post Office Box 3193
Orlando, Florida 32802

DEP File No. 0950137-014-AC
Stanton Energy Center Units 1 and 2
Forced Oxidation Project
Orange County, Florida

Authorized Representative:
Ms. Denise Stalls, Vice President

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit, copy of Draft Permit attached, for the proposed project as detailed in the above application for the reasons stated below.

The applicant, OUC, applied on February 5, 2007 to the Department for a permit to install forced oxidation equipment on the wet flue gas desulfurization scrubbers for Units 1 and 2 at the existing Curtis H. Stanton Energy Center east of Orlando in Orange County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-212 and 62-213. This action is not exempt from permitting procedures. The Department has determined that an air construction permit is required.

The Department intends to issue this permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final construction permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 days from the date of publication of Public Notice. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the construction permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within 14 days of publication of the public notice or within 14 days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specified rules or statutes; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

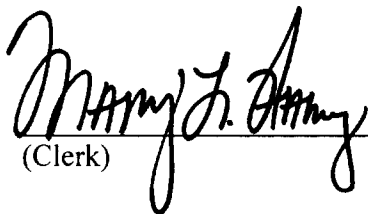
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice, Technical Evaluation, and the Draft permit) and all copies were sent electronically (with Received Receipt) before the close of business on **September 11, 2007** to the persons listed:

Denise Stalls, OUC: dstalls@ouc.com
Jim Bradner, DEP CD: james.bradner@dep.state.fl.us
Lori Cunniff, Orange County EPD: lori.cunniff@ocfl.net
Jim Little, EPA Region 4: little.james@epamail.epa.gov
Katy Forney, EPA Region 4: forney.kathleen@epa.gov
Larry Todd Newland, P.E., Black & Veatch: newlandlt@bv.com
Mike Halpin, DEP Siting: mike.halpin@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52, Florida Statutes,
with the designated Department Clerk, receipt of
which is hereby acknowledged.


(Clerk)

9/11/07
(Date)

**TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

Orlando Utilities Commission
Curtis H. Stanton Energy Center Units 1 & 2

Forced Oxidation Project

Orange County

DEP File No. 0950137-014-AC



Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
Permitting South

September 11, 2007

1. GENERAL FACILITY DESCRIPTION

Facility Description and Location

The OUC Curtis H. Stanton Energy Center is located in Orange County, Southeast of Orlando and North of Highway 528 at 5100 South Alafaya Trail. The site is located 144 km southeast from the Chassahowitzka National Wildlife Area; the nearest Federal Prevention of Significant Deterioration (PSD) Class I Area. The UTM coordinates for this site are 483.6 km East and 3151.1 North. The location of the OUC Stanton Energy Center is shown in Figure 1.

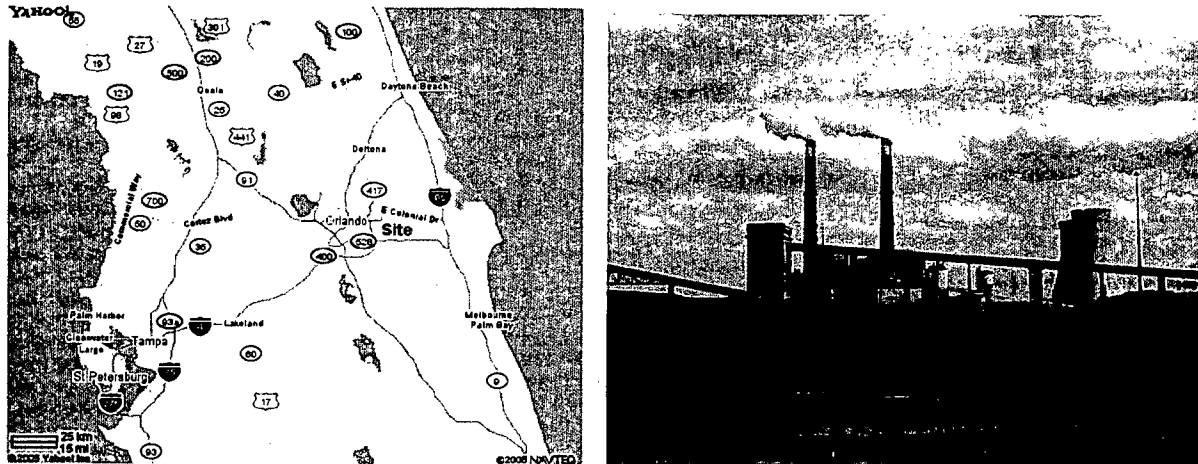


Figure 1. OUC Curtis H. Stanton Energy Center Location and Stanton Units 1 and 2.

The OUC Stanton Energy Center presently consists of two fossil fuel-fired steam electrical generating units and a combined cycle unit. Fossil fuel-fired steam electric generating Units 1 and 2 (468 megawatts-MW each) began operation in 1987 and 1996 while Combined Cycle Unit A (640 MW) began operation in 2003. A PSD permit was recently issued for the construction of a nominal 285 MW integrated gasification combined cycle unit (Unit B) planned to be operational by 2012.

Table 1. OUC Curtis H. Stanton Energy Center SIC Codes

STANDARD INDUSTRIAL CLASSIFICATION CODES (SIC)		
Industry Group No.	49	Electric, Gas, and Sanitary Services
Industry No.	4911	Electric Services

Key Regulatory Categories

The key regulatory provisions applicable to Stanton Units 1 and 2 are:

Title I, Part C, Clean Air Act (CAA): The facility is located in an area that is designated as “attainment”, “maintenance”, or “unclassifiable” for each pollutant subject to a National Ambient Air Quality Standard. It is classified as a “fossil fuel-fired steam electric plant of more than 250 million BTU per hour of heat input”, which is one of the 28 Prevention of Significant Deterioration (PSD) Major Facility Categories with the lower PSD applicability threshold of 100 tons per year. Potential emissions of at least one regulated pollutant exceed 100 tons per year, therefore the facility is classified as a “major stationary source” of air pollution with respect to Rule 62-212.400 F.A.C., Prevention of Significant Deterioration of Air Quality.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Title I, Section 111, CAA: Units 1 and 2 are subject to Subpart Da (Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978) of the New Source Performance Standards in 40 CFR 60.

Title I, Section 112, CAA: The facility is a "Major Source" of hazardous air pollutants (HAP).

Title IV, CAA: The facility operates units subject to the Acid Rain provisions of the Clean Air Act.

Title V, CAA: The facility is a Title V or "Major Source of Air Pollution" in accordance with Chapter 62-213, F.A.C. because the potential emissions of at least one regulated pollutant exceed 100 tons per year (TPY). Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and volatile organic compounds (VOC).

CAIR: The facility is subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, Florida Administrative Code (FAC).

CAMR: The facility is subject to the Clean Air Mercury Rule (CAMR) set forth in Rule 62-296.480, F.A.C.

Siting: The facility was originally certified pursuant to the power plant siting provisions of Chapter 62-17, F.A.C.

Application Processing Schedule

- 02/05/07: Received application to construct, install or improve low NO_x burners (LNBS), overfire air (OFA), forced oxidation, ash loadout system and scrubber on Units 1 and 2.
- 03/07/07: Application determined incomplete. Sent request for additional information (RAI).
- 08/09/07: Received partial responses to RAI.
- 09/04/07: Received additional responses to RAI including Best Available Control Technology (BACT) proposal for carbon monoxide (CO), revised application pages, air dispersion modeling, etc.
- 09/06/07 Separated out requests into three different projects including the present on for the forced oxidation systems.
- 09/07/07 Received additional information for forced oxidation project. Determined it is complete.
- 09/11/07 Distributed public notice package including the draft PSD permit for the forced oxidation project.

Wet Flue Gas Desulfurization (WFGD) Limestone Scrubbing for SO₂ Control

Stanton Units 1 and 2 utilize WFGD limestone-based scrubbers to control SO₂ emissions. The figure on the following page is a simplified flow diagram of a design from the early 1990s that reasonably represents the scrubbing principles used at OUC Stanton Units 1 and 2. Each unit's scrubber system includes three (3) 50 percent (%) capacity absorber modules, with two normally in operation and the other designated as a spare. Authority to inject dibasic acid (DBA) was given under a recently issued permit.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Limestone is ground and mixed with water in a reagent preparation area. The resultant slurry is pumped to the absorber and sprayed into the flue-gas stream. The slurry droplets absorb SO_2 from the flue gas and fall to the base of the absorber, where they are collected in a reaction tank.

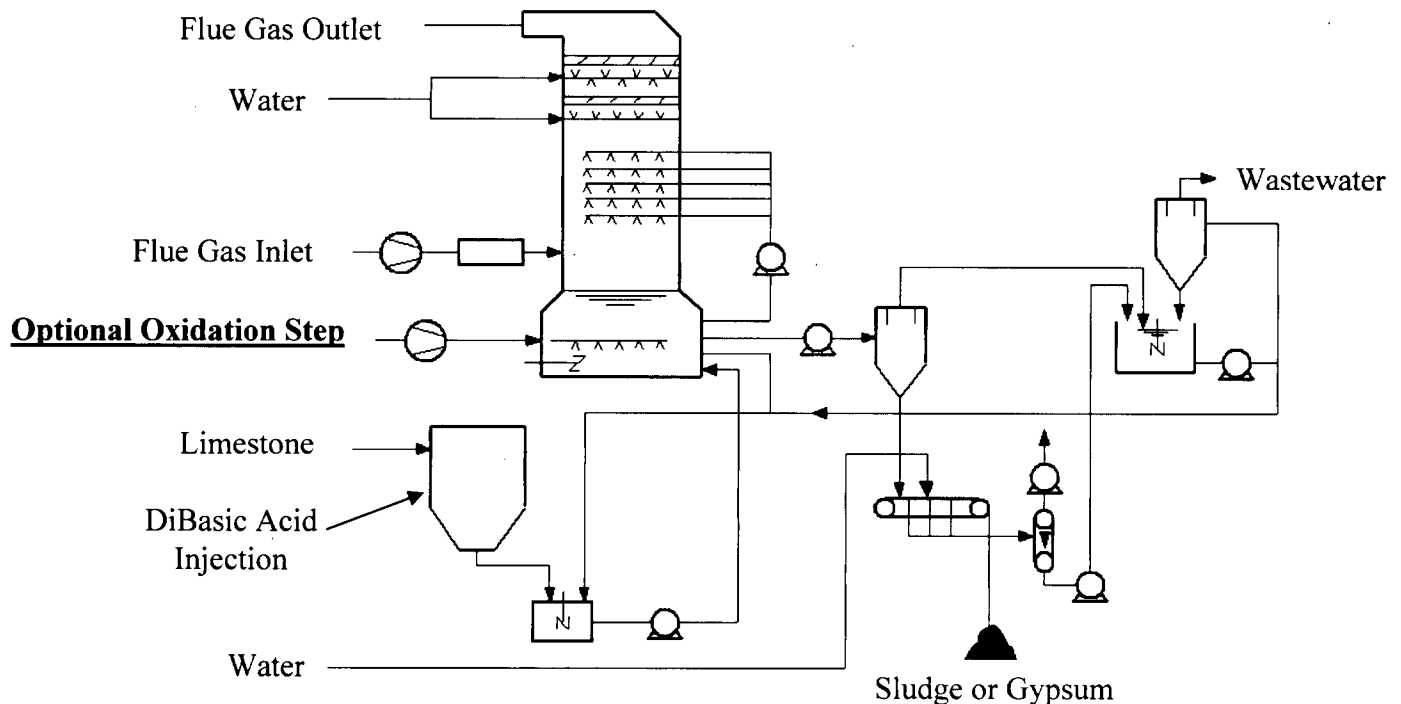
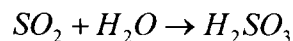


Figure 2. Flow Diagram of a WFGD Limestone Scrubber System (Soud and Takeshita, 1994).

The reactions in the absorber and tank can be represented by the following simplified description:

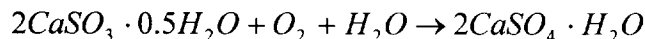
Equation 1. Sulfur dioxide and water react to form sulfurous acid.



Equation 2. Sulfurous acid reacts with limestone to form calcium sulfite ($\text{CaSO}_3 \cdot \frac{1}{2}\text{H}_2\text{O}$), carbon dioxide (CO_2) and water (H_2O).



Equation 3. Most $\text{CaSO}_3 \cdot 0.5\text{H}_2\text{O}$ is further oxidized to form gypsum ($\text{CaSO}_4 \cdot 2\text{H}_2\text{O}$).



Measures to enhance and drive the reaction in equation 3 towards completeness are not practiced at OUC Stanton and salable quality gypsum is not produced. Instead, fly ash removed by the electrostatic precipitators (ESPs) prior to scrubbing is blended with scrubber sulfite/sulfate sludge and hydrated lime to solidify the material. It is then deposited in special retention areas on site, and covered with soil and vegetation.

2. PROJECT DESCRIPTION

The following descriptions are based on information provided by Black and Veatch (BV) for OUC and from Babcock & Wilcox Publication BR 1645 on forced oxidation options.

Description of Forced Oxidation for WFGD Limestone based Scrubbers

Both systems currently are operating in a *natural oxidation* mode, where approximately 75 % of the scrubber reaction products are calcium sulfate ($\text{CaSO}_4 \cdot 2\text{H}_2\text{O}$ also called gypsum) and the remainder is calcium sulfite ($\text{CaSO}_3 \cdot 0.5\text{H}_2\text{O}$). In state-of-the-art WFGD systems, gypsum scale is effectively controlled through the use of *forced oxidation* of the sulfite compounds to sulfate. See the optional oxidation step where forced air injection can be practiced in the above diagram.

The higher oxidation rates, usually in excess of 95 %, in combination with recycle tank suspended solids concentrations of 12-15 %, provide for controlled precipitation of the gypsum crystals. This greatly reduces scaling by forcing gypsum crystals to grow upon themselves and not form on absorber internal components. In this manner, the scaling and deposit growth on the WFGD internals can be significantly reduced resulting in greater reliability of the absorber modules and lower maintenance costs.

In the forced oxidation mode, air molecules are injected into the absorber slurry in the reaction tank. The air molecules are absorbed in the scrubbing liquor, and provide ample driving force to convert nearly all liquid phase sulfite to sulfate. Gypsum super saturation is controlled by ensuring adequate gypsum seed crystals are present in the absorber liquor.

The method chosen for the introduction of oxidation air has an influence on plant costs and system operating requirements. Air sparge grids and air lances with mechanical agitators are two different generally applied methods of introducing oxidation air into the process. The sparge grid is a multiple air header arrangement with near even spacing of bubble stations across the vessel plan area. The lance system consists of air pipes directed to a definite region in the liquid jet created by side entry mixers. Following are diagrams from Babcock & Wilcox of the two options that would be placed within the vessel indicated in Figure 2.

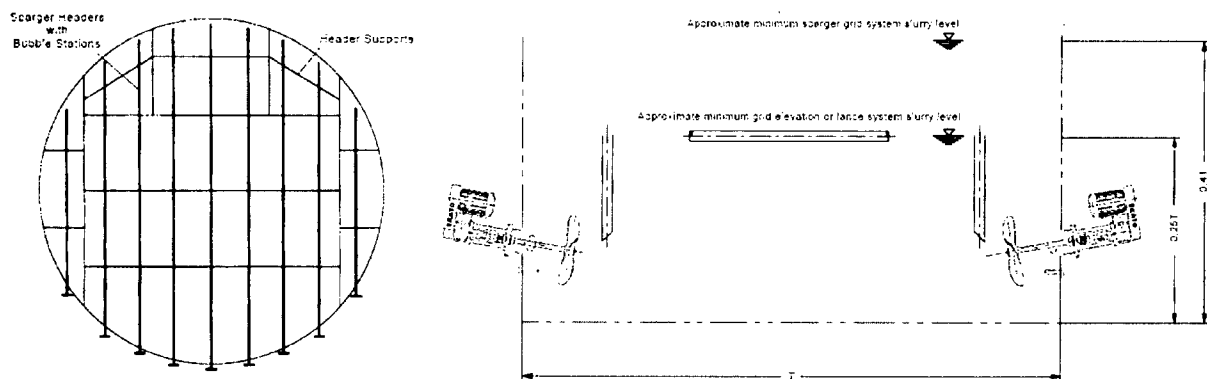


Figure 3. Top View Sparger Grid Plan. Agitator/Lance Assembly and Practical Decision Criteria.

The performance of the lance system is influenced by the energy of the fluid jet (mixer power) and the submergence depth (compressor power). The performance of the sparge grid is less dependent on the mixer power and is, to a much greater degree, influenced by submergence depth.

Description of Forced Oxidation Project at Stanton Units 1 and 2

It has been determined that the Stanton Unit 1 and Unit 2 existing absorber systems would support the addition of forced oxidation. There is adequate depth in the recycle tanks to inject air in the manner shown in the above diagrams at the proper depth (~ 22 feet below liquid level) without affecting recycle pump performance. Air injection will be accomplished by installing a fixed grid sparging system in each recycle tank.

The following information is based on preliminary design of the forced oxidation systems. The oxidation air system will consist of centrifugal air blowers with air piped to each reaction tank and distributed inside the tanks with air spargers. Each unit will have a dedicated 100 % capacity oxidation air blower. The units will share a spare 100 % capacity blower. The oxidation air will be saturated with service water. The forced oxidation system will consist of the following:

- Three 100 % capacity centrifugal air blowers;
- Air piping and valves;
- Reaction tank air spargers;
- Saturation water piping;
- Foundations;
- Blower building;
- Electrical components; and
- Controls

None of the above equipment is a source of air emissions. The purpose of the forced oxidation systems is to improve scrubber reliability and reduce scrubber module maintenance. Note that each existing scrubber system includes a spare module that is used when scrubber module maintenance is required.

The use of a forced oxidation system will result in increased formation of $\text{CaSO}_4 \cdot 2\text{H}_2\text{O}$ and less formation of $\text{CaSO}_3 \cdot 0.5\text{H}_2\text{O}$ as a scrubber byproduct.

It is estimated that in the existing natural oxidation WFGD systems approximately 75 % of the SO_2 reaction product is $\text{CaSO}_4 \cdot 2\text{H}_2\text{O}$, while in a forced oxidation system approximately 98 % of the SO_2 reaction product is expected to be $\text{CaSO}_4 \cdot 2\text{H}_2\text{O}$, with the remainder in both cases being $\text{CaSO}_3 \cdot 0.5\text{H}_2\text{O}$.

With a constant coal sulfur content, due to the higher molecular weight of the $\text{CaSO}_4 \cdot 2\text{H}_2\text{O}$ byproduct, one could expect approximately a 7.4 % increase in the quantity of scrubber byproduct produced on a dry solids basis. However, because calcium sulfate is easier to dewater, the use of a forced oxidation system allows for production of a higher percent solids scrubber

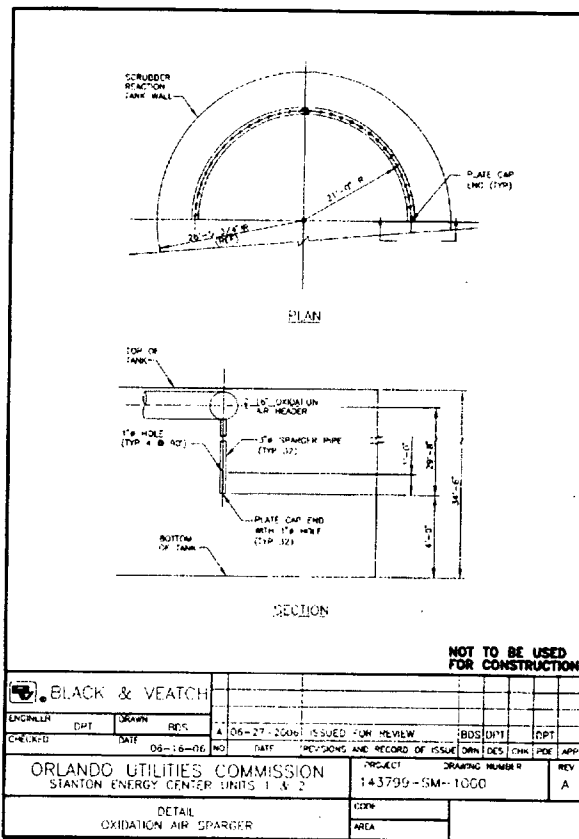


Figure 4. Details of Planned Air Spargers

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

byproduct. Therefore, with the same fuel sulfur content, there is expected to be no increase in total scrubber byproduct production and therefore no change in any fugitive emissions associated with byproduct materials handled.

3.0 CONCLUSION

Because there are no expected increases of any regulated pollutant, the project is not a modification as described in 62-210.200 (Definitions), F.A.C. and therefore not subject to PSD review. However, a permit is still required in accordance with paragraph 62-210.300 that states:

“Unless exempted from permitting pursuant to paragraph 62-210.300(3)(a) or (b), F.A.C., or Rule 62-4.040, F.A.C., or unless specifically authorized by provision of Rule 62-210.300(4), F.A.C., or Rule 62-213.300, F.A.C., the owner or operator of any facility or emissions unit which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from the Department prior to beginning construction, reconstruction pursuant to 40 CFR 60.15 or 63.2, modification, or the addition of pollution control equipment; etc.”

The Department will issue a permit authorizing the installation of the forced oxidation systems on Stanton Units 1 and 2. The Department’s determination is strictly limited to this specific case and should not be used as a precedent for other cases, or lead to unintended consequences construed from the language contained in this determination. Ultimately, it is the Department that interprets its own regulations and opinions.

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0950137-014-AC

OUC Curtis H. Stanton Energy Center Units 1 and 2
Forced Oxidation Project

Orange County

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit to Orlando Utilities Commission (OUC). The permit authorizes the installation of forced oxidation equipment on the wet flue gas desulfurization (WFGD) scrubbers for Units 1 and 2 at the Curtis H. Stanton Energy Center located in Orange County. A best available control technology (BACT) determination was not required. The applicant's name and address are OUC, Post Office Box 3193, Orlando, Florida 32802.

OUC Stanton Units 1 and 2 each consist of a coal fired boiler/steam generator and steam turbine with a 468 megawatts nominal capacity rating. Each unit is equipped with an electrostatic precipitator for control of particulate matter and a WFGD scrubber for sulfur dioxide control. Unit 2 is also equipped with nitrogen oxides (NO_x) control equipment consisting of low NO_x burners and a selective catalytic reduction system.

The forced oxidation equipment will be used to improve scrubber reliability and reduce maintenance by controlling the tendency of scale formation within scrubber internal components. The forced oxidation equipment includes: centrifugal air blowers, air piping and valves, reaction tank air spargers, saturation water piping, foundations, a blower building, electrical components, and controls. No emissions increases are expected due to the project.

The Department has reasonable assurance that the project will not result in significant net emission increases from the unit that would otherwise require a review under the Rules for the Prevention of Significant Deterioration (PSD) at Section 62-212.400, F.A.C.

The Department will issue the final air construction permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be

filed within 14 days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within 14 days of publication of the public notice or within 14 days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specified rules or statutes; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

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A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/921-9533

Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: 407/894-7555
Fax: 407/897-5963

The complete project file includes the technical evaluation and the Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Program Administrator, South Permitting Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information. The draft permit and technical evaluation can be accessed at www.dep.state.fl.us/Air/permitting/construction/ouc-stanton_forcedox.htm

PERMITTEE:

Orlando Utilities Commission (OUC)
500 South Orange Avenue
Orlando, Florida 32802

Authorized Representative:
Ms. Denise Stalls, Vice President
Environmental Affairs

DEP File No. 0950137-014-AC
Curtis H. Stanton Energy Center
Stanton Units 1 and 2
SIC No. 4911
Forced Oxidation Project
Orange County, Florida

PROJECT AND LOCATION

This permit authorizes the addition of forced oxidation equipment to the existing wet flue gas desulfurization (WFGD) systems on Units 1 and 2 at the OUC Curtis H. Stanton Energy Center. The facility is located at 5100 Alafaya Trail, Orlando, Orange County.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and Title 40, Parts 60 and 63 of the Code of Federal Regulations (CFR). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

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Joseph Kahn, Director (Date)
Division of Air Resource Management

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

The existing facility consists of two 468 megawatts (MW) fossil fuel fired steam electric generating units (Units 1 and 2), and one 640 MW combined cycle unit. There are storage and handling facilities for solid fuels, fly ash, limestone, gypsum, slag, and bottom ash. A recently permitted nominal 285 MW integrated gasification and combined cycle unit (Unit B) is under construction and will be operational by 2012.

The project under this permit is for the installation of forced oxidation equipment on the existing WFGD scrubbers on Units 1 and 2. The forced oxidation equipment includes: centrifugal air blowers; air piping and valves; reaction tank air spargers; saturation water piping; foundations; a blower building; electrical components; and controls.

EU ID	Emissions Unit Description
001	Fossil Fuel Fired Steam Electric Generator No. 1
002	Fossil Fuel Fired Steam Electric Generator No. 2

REGULATORY CLASSIFICATION

The facility is a potential major source of hazardous air pollutants (HAPs).

The facility operates existing units subject to the Acid Rain provisions of Title IV of the Clean Air Act (CAA).

The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

The facility is a major stationary source (PSD-major source) in accordance with Rule 62-212.400, F.A.C.

The facility operates units subject to the Standards of Performance for New Stationary Sources pursuant to 40 CFR Part 60.

The facility does not operate electrical generating units subject to National Emissions Standards for Hazardous Air Pollutants pursuant to 40 CFR Part 63.

The facility is subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

The facility is subject to the Clean Air Mercury Rule (CAMR) set forth in Rule 62-296.480, F.A.C.

The facility operates units that were certified under the Florida Power Plant Siting Act, 403.501-518, F.S.

RELEVANT DOCUMENTS

The following relevant documents are not a part of this permit, but helped form the basis for this permitting action: the permit application and additional information received to make it complete; and the Department's Technical Evaluation and Preliminary Determination.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. **Permitting Authority:** The Permitting Authority for this project is the Bureau of Air Regulation in the Division of Air Resource Management of the Department. The mailing address for the Bureau of Air Regulation is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400.
2. **Compliance Authority:** All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Office. The mailing address and phone number of the Central District Office are: Department of Environmental Protection, Central District Office, 3319 Maguire Boulevard, Suite 232, Orlando Florida 32803-3767. Telephone: (407)894-7555. Fax: (407)897-5963.
3. **Appendices:** The following Appendices are attached as part of this permit: Appendix GC (General Conditions).
4. **Applicable Regulations, Forms and Application Procedures:** Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. **New or Additional Conditions:** For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. **Modifications:** No emissions unit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. **Title V Permit:** This permit authorizes specific modifications and/or new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Bureau of Air Regulation with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS

This section of the permit addresses the following existing emissions units.

Emissions Units 001 and 002

Fossil Fuel Fired Steam Generators 1 and 2 are wall-fired, dry bottom boilers, firing pulverized coal as the primary fuel and No. 6 fuel oil for purposes of startup and flame stabilization. Each unit has a maximum heat input rate of 4,286 million Btu per hour with a nominal generating capacity of 468 MW. Each unit is equipped with an electrostatic precipitator (ESP) for control of particulate matter (PM/PM₁₀), a WFGD system for sulfur dioxide (SO₂) control, and low NO_x burners for nitrogen oxides (NO_x) control. Unit 2 is also equipped with a selective catalytic reduction (SCR) system for further control of NO_x emissions. The following parameters are continuously monitored on both units: NO_x, opacity, SO₂, CO₂, and stack gas flow rate.

APPLICABLE STANDARDS AND REGULATIONS

1. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]
2. The facility is subject to all of the requirements specified in Title V Air Operation Permit Renewal No. 1050004-016-AV.

GENERAL OPERATION REQUIREMENTS

3. Unconfined Particulate Emissions. During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.520(4), F.A.C.]
4. Plant Operation – Problems. If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the owner or operator shall notify the Department as soon as possible, but at least within (1) working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]
5. Operating Procedures. Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.]
6. Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

EQUIPMENT AND CONTROL TECHNOLOGY

7. Forced Oxidation Equipment. The permittee is authorized to construct, operate and maintain forced oxidation equipment on the WFGD scrubbers for Units 1 and 2 as described in the application. In general, the forced oxidation equipment will include: centrifugal air blowers, air piping and valves, reaction tank air spargers, saturation water piping, foundations, a blower building, electrical components, and controls. [Applicant Request]

SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS

REPORTING AND NOTIFICATION REQUIREMENTS

8. Notification. Within one week of beginning construction of the forced oxidation project, the permittee shall notify the Compliance Authority that the project has commenced and provide a general schedule of construction activities. Within one week following the end of construction, the permittee shall notify the Compliance Authority that the project was completed.
[Rule 62-4.210, F.A.C.]



SECTION 4. APPENDIX GC – GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and

- b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (Not Applicable);
 - b. Determination of Prevention of Significant Deterioration (Not Applicable);
 - c. Compliance with National Emission Standards for Hazardous Air Pollutants (Not Applicable); and
 - d. Compliance with New Source Performance Standards (Not Applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.

When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Harvey, Mary

From: Harvey, Mary
Sent: Tuesday, September 11, 2007 11:39 AM
To: 'dstalls@ouc.com'; Bradner, James; 'lori.cunniff@ocfl.net'; 'little.james@epamail.epa.gov'; 'forney.kathleen@epa.gov'; 'newlandt@bv.com'; Halpin, Mike
Cc: Linero, Alvaro; Adams, Patty; Gibson, Victoria
Subject: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT
Attachments: 0950137.014.AC.D_pdf.zip

Tracking:

Recipient	Read
✓ 'dstalls@ouc.com'	
✓ Bradner, James	Read: 9/11/2007 2:32 PM
✓ 'lori.cunniff@ocfl.net'	
✓ 'little.james@epamail.epa.gov'	
✓ 'forney.kathleen@epa.gov'	
✓ 'newlandt@bv.com'	
✓ Halpin, Mike	Read: 9/11/2007 11:53 AM
✓ Linero, Alvaro	Read: 9/11/2007 12:06 PM
Adams, Patty	Read: 9/12/2007 10:44 AM
✓ Gibson, Victoria	Read: 9/11/2007 11:43 AM

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<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,

DEP, Bureau of Air Regulation

9/14/2007

Harvey, Mary

From: Newland, Larry T. (Todd) [NewlandLT@bv.com]
Sent: Tuesday, September 11, 2007 1:38 PM
To: Harvey, Mary
Subject: RE: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT

Black & Veatch has received.

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Tuesday, September 11, 2007 11:39 AM
To: dstalls@ouc.com; Bradner, James; lori.cunniff@ocfl.net; little.james@epamail.epa.gov; forney.kathleen@epa.gov; Newland, Larry T. (Todd); Halpin, Mike
Cc: Linero, Alvaro; Adams, Patty; Gibson, Victoria
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9/11/2007

Harvey, Mary

From: Linero, Alvaro
To: Harvey, Mary
Sent: Tuesday, September 11, 2007 12:06 PM
Subject: Read: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT

Your message

To: 'dstalls@ouc.com'; Bradner, James; 'lori.cunniff@ocfl.net'; 'little.james@epamail.epa.gov'; 'forney.kathleen@epa.gov'; 'newlandt@bv.com'; Halpin, Mike
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Subject: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT
Sent: 9/11/2007 11:39 AM

was read on 9/11/2007 12:06 PM.

Harvey, Mary

From: Newland, Larry T. (Todd) [NewlandLT@bv.com]
To: undisclosed-recipients
Sent: Tuesday, September 11, 2007 11:56 AM
Subject: Read: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT

Your message

To: NewlandLT@bv.com
Subject:

was read on 9/11/2007 11:56 AM.

Harvey, Mary

From: Halpin, Mike
To: Harvey, Mary
Sent: Tuesday, September 11, 2007 11:55 AM
Subject: Read: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT

Your message

To: 'dstalls@ouc.com'; Bradner, James; 'lori.cunniff@ocfl.net'; 'little.james@epamail.epa.gov'; 'forney.kathleen@epa.gov'; 'newlandit@bv.com'; Halpin, Mike
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Subject: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT
Sent: 9/11/2007 11:39 AM

was read on 9/11/2007 11:53 AM.

Harvey, Mary

From: Lori.Cunniff@ocfl.net
To: Harvey, Mary
Sent: Tuesday, September 11, 2007 11:50 AM
Subject: Read: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT

Your message

To: Lori.Cunniff@ocfl.net
Subject:

was read on 9/11/2007 11:50 AM.

Harvey, Mary

From: Gibson, Victoria
To: Harvey, Mary
Sent: Tuesday, September 11, 2007 11:43 AM
Subject: Read: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT

Your message

To: 'dstalls@ouc.com'; Bradner, James; 'lori.cunniff@ocfl.net'; 'little.james@epamail.epa.gov'; 'forney.kathleen@epa.gov'; 'newlandlt@bv.com'; Halpin, Mike
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Subject: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT
Sent: 9/11/2007 11:39 AM

was read on 9/11/2007 11:43 AM.

Harvey, Mary

From: Stalls, Denise M. [DStalls@ouc.com]
Sent: Tuesday, September 11, 2007 1:39 PM
To: Harvey, Mary
Subject: RE: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Tue 9/11/2007 11:39 AM
To: Stalls, Denise M.; Bradner, James; lori.cunniff@ocfl.net; little.james@epamail.epa.gov; forney.kathleen@epa.gov; newlandlt@bv.com; Halpin, Mike
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DEP, Bureau of Air Regulation

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From: Forney.Kathleen@epamail.epa.gov
Sent: Tuesday, September 11, 2007 1:58 PM
To: Harvey, Mary
Cc: little.james@epamail.epa.gov
Subject: Re: FW: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT

thanks Mary we received it fine.
KT

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

"Harvey, Mary"
<Mary.Harvey@dep
.state.fl.us>

09/11/2007 11:40
AM

To
Kathleen Forney/R4/USEPA/US@EPA,
James Little/R4/USEPA/US@EPA

cc

Subject
FW: Orlando Utilities Commission
- Facility #0950137-014-AC-DRAFT

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Sent: Tuesday, September 11, 2007 2:33 PM
Subject: Read: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT

Your message

To: 'dstalls@ouc.com'; Bradner, James; 'lori.cunniff@ocfl.net'; 'little.james@epamail.epa.gov'; 'forney.kathleen@epa.gov'; 'newlandt@bv.com'; Halpin, Mike
Cc: Linero, Alvaro; Adams, Patty; Gibson, Victoria
Subject: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT
Sent: 9/11/2007 11:39 AM

was read on 9/11/2007 2:32 PM.

Harvey, Mary

From: Bradner, James
Sent: Tuesday, September 11, 2007 2:33 PM
To: Harvey, Mary
Subject: RE: Orlando Utilities Commission - Facility #0950137-014-AC-DRAFT

Received—thank you.

From: Harvey, Mary
Sent: Tuesday, September 11, 2007 11:39 AM
To: 'dstalls@ouc.com'; Bradner, James; 'lori.cunniff@ocfl.net'; 'little.james@epamail.epa.gov'; 'forney.kathleen@epa.gov'; 'newlandlt@bv.com'; Halpin, Mike
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