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



Via E-Mail

April 16, 2010

Mr. David Read. Engineering Specialist II Special Projects Section, Bureau of Air Regulation Division of Air Resources Management Florida Dept. of Environmental Protection 2600 Blair Stone Road MS 5500 Tallahassee, Florida 32399-2400

Dear Mr. Read:

Subject: OUC- Stanton Energy Center Permit 0950137-028-AC SEC Units 1 and 2 Temporary Short-Term Test Burn of Chem-Mod Fuel Coal Additive Project

The Florida Department of Environmental Protection granted the Orlando Utilities Commission construction permit 0950137-028-AC in order to test the efficacy of a coal additive for flue gas NOx concentration reduction.

The permit was approved by the FDEP on December 28, 2009 and expires June 30, 2010.

Section 3, condition 6 of the subject permit, requires that OUC complete the test within ninety (90) successive calendar days of when the fuel additive is initially applied to the coal.

OUC applied the fuel additive for the first time December 29, 2009, and then conducted two test applications on January 21-22, 2010 and February 20-26 2010 respectively.

The modified fuel has only been burned on Unit 1. Unit 1 went on a turbine outage starting on February 26, 2010 and is expected to return to operations on May 3rd 2010.

In order to complete a better rounded test, OUC would like to apply the fuel additive and burn the modified fuel for a longer period, once Unit 1 returns from the outage.

OUC requests that specific condition 6, of section 3 of the subject permit, and the permit expiration date be modified to allow for a longer period of testing. The suggested wording is "<u>Test Duration</u>: The test shall be limited to no more than ninety (90) days of fuel additive application to the coal." The permit expiration date extension requested is to July 30th, 2010. These modifications would allow OUC to complete a better representative test of the Chem-mod fuel additive performance.

Sincerely.

Denise M. Stalls, Vice President

Human and Environmental Resources

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cc: Al Linero, FDEP David R. Baez, OUC Garfield Blair, OUC