



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

January 11, 2008

Electronically Sent

Ms. Denise M. Stalls
Vice President, Environmental Affairs
Orlando Utilities Commission
Post Office Box 3193
Orlando, Florida 32802

Re: Recognition of Dow Chemical's COVOL 298 as a Coal Dust Suppressant
Stanton Energy Center, Facility ID No. 0950137

Dear Ms. Stalls:

We received your request dated October 11, 2007 and additional information on January 9, 2008, to begin using Dow Chemical's COVOL 298 on coal as a means of suppressing fugitive dust. The Department previously approved the use of COVOL 298-1. Review of the material safety data sheet (MSDS) sheets indicates that COVOL 298 is very similar to COVOL 298-1, except that COVOL 298 contains ammonia.

It is our opinion that this particular material falls within the classification of "chemical dust suppressant" that is authorized by your Title V permit (see Appendix TV-4, condition 57.) For inspection purposes, please retain on-site a copy of the material safety data sheet (MSDS), a copy of your contract with the local supplier specifying the material that they will be applied to your coal, and a certification from the supplier accompanying each delivery that attests that this is the only material that has been applied to your coal. If OUC, or the supplier, desires to use a different material, you must inform the Department and receive concurrence prior to combusting the new product. It should be noted that this approval is only valid if the COVOL 298 is not applied to the coal on-site. Should you wish to apply this product to your coal on-site, a construction permit application detailing the increase in VOC/HAP emissions must first be submitted for processing.

Under the provisions of Rule 62-297.310(7)(b), F.A.C., if, at any time the Department has reason to believe that any of your emission limits are not being met, i.e., increased opacity, particulate matter, etc., it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

Should you have any questions regarding this matter, please contact Mr. Scott M. Sheplak, P.E. at 850/921-9532 or write to me at the above letterhead address.

Sincerely,

Trina L. Vielhauer
Chief
Bureau of Air Regulation

TLV/raw/sms

copy to: Mr. Mike Halpin, P.E., DEP-Siting
Mr. James Bradner, P.E., DEP-CD
Mr. Hamp Pridgen, OCEPD