

Costello, Martin

From: Baez, David R. [DBaez@ouc.com]
Sent: Wednesday, July 06, 2011 4:52 PM
To: Costello, Martin
Cc: Blair, Garfield; Linero, Alvaro
Subject: RE: OUC DSI Application
Attachments: Sadsec3km2211070616430.pdf

Marty,

I did some editing of the letter and corrected the method for H2SO4.

Let me know if you need anything else.

thank you

David R. Báez
Project Engineer, Environmental Affairs
Orlando Utilities Commission
407-434-3072 (office)
407-719-6515 (cell)
407-244-8794 (fax)
dbaez@ouc.com

From: Baez, David R.
Sent: Wednesday, July 06, 2011 3:16 PM
To: 'Costello, Martin'
Cc: Blair, Garfield; Linero, Alvaro
Subject: RE: OUC DSI Application

Marty,

Please let me know if the attached letter is what you need.

thank you

From: Costello, Martin [<mailto:Martin.Costello@dep.state.fl.us>]
Sent: Wednesday, July 06, 2011 11:52 AM
To: Baez, David R.; Linero, Alvaro; soltysm@bv.com
Subject: RE: OUC DSI Application

David,

Please send me a short letter, signed by yourself or your representative, which outlines the testing associated with the higher sulfur coal blends. I expect the letter to specify that EPA test methods are part of this testing and that the department may have access to the test results if requested. Please also indicate if you can give the DEP Central District office 15 days prior notice of your testing so that staff has an opportunity to observe testing if schedules permit.

You can scan and email or fax it back to me if you would like to expedite this.

Martin Costello, P.E.

850/717-9040

(850/717-9001 fax)

From: Baez, David R. [mailto:DBaez@ouc.com]
Sent: Wednesday, July 06, 2011 11:22 AM
To: Linero, Alvaro; Costello, Martin; soltysm@bv.com
Subject: RE: OUC DSI Application

Al, Marty,

We are planning to complete testing of SO₃/H₂SO₄ at various locations throughout the unit (i.e. pre/post SCR, pre/post ESP) including the stack during the different coal blends.

We also plan on testing for total PMs, HCl and Hg at the different coal blends to evaluate EGU MACT compliance potential.

The EGU MACT testing would be at the stack so we could use the filterable portion of the total PM test as compliance proof.

Please let me know if you need more information.

thank you

David R. Báez
Project Engineer, Environmental Affairs
Orlando Utilities Commission
407-434-3072 (office)
407-719-6515 (cell)
407-244-8794 (fax)
dbaez@ouc.com

From: Linero, Alvaro [mailto:Alvaro.Linero@dep.state.fl.us]
Sent: Wednesday, July 06, 2011 11:07 AM
To: Baez, David R.; Costello, Martin; soltysm@bv.com
Subject: RE: OUC DSI Application

Sorry I missed the call David.

We are kicking around the possibility of exempting this activity from permitting.

Do you have a test plan in mind for PM and H₂SO₄ for your own purposes already such that we wouldn't have to require one?

Then we could just refer to your request as the basis for the possible exemption.

Thank you.

Al Linero.

A. A. Linero, P.E.
Florida Department of Environmental Protection
Permitting and Compliance Section
850-717-9076

From: Baez, David R. [mailto:DBaez@ouc.com]
Sent: Wednesday, July 06, 2011 8:09 AM
To: Costello, Martin; Linero, Alvaro
Subject: Re: OUC DSI Application

Marty,

Can we have a quick call at 9:30?

From: Costello, Martin <Martin.Costello@dep.state.fl.us>
To: Baez, David R.; Linero, Alvaro <Alvaro.Linero@dep.state.fl.us>
Sent: Wed Jul 06 07:51:13 2011
Subject: RE: OUC DSI Application

David,

Sorry to have missed you yesterday. Is there a good time to call you today?

From: Baez, David R. [mailto:DBaez@ouc.com]
Sent: Thursday, June 30, 2011 7:56 PM
To: Linero, Alvaro; 'soltysjm@bv.com'; Costello, Martin
Cc: Stalls, Denise M.; Blair, Garfield; 'LucasKJ@bv.com'; Shine, Caroline; Holtom, Jonathan; Koerner, Jeff
Subject: Re: OUC DSI Application

Al,

You are correct, it is a temporary project while OUC completes a test burn of Illinois basin coal which has a higher sulfur content than the central appalachian coal Stanton typically burns.

If the test burn goes well OUC would request a construction permit for a permanent installation.

Thank you
David Baez

From: Linero, Alvaro <Alvaro.Linero@dep.state.fl.us>
To: Soltys, J. Michael (Mike) <soltysjm@bv.com>; Costello, Martin <Martin.Costello@dep.state.fl.us>
Cc: Stalls, Denise M.; Blair, Garfield; Baez, David R.; Lucas, Kyle J. <LucasKJ@bv.com>; Shine, Caroline <Caroline.Shine@dep.state.fl.us>; Holtom, Jonathan <Jonathan.Holtom@dep.state.fl.us>; Koerner, Jeff <Jeff.Koerner@dep.state.fl.us>
Sent: Thu Jun 30 19:00:01 2011
Subject: RE: OUC DSI Application

Thank you Mike.

This project has been assigned to Marty Costello. He will get in touch with you or David Baez if he needs anything.

So it is just a temporary project to see if you can abate any increased sulfuric acid mist from higher sulfur coal test and not a permanent installation?

Al Linero.

A.A. Linero, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation/Special Projects Section
1-850-717-9076

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Soltys, J. Michael (Mike) [soltysjm@bv.com]

Sent: Thursday, June 30, 2011 5:50 PM

To: Linero, Alvaro

Cc: Denise Stalls @ OUC; Garfield Blair @ OUC; David Baez @ OUC; Lucas, Kyle J.; Shine, Caroline

Subject: OUC DSI Application

Al – As recently discussed, and on behalf of OUC, attached please find an application to install and operate a temporary dry sorbent injection system at Stanton Unit 2 for coal test burns beginning in late July. Please contact me or David Baez if you have any questions. Thank you.

Mike Soltys | Project Manager, Energy

Black & Veatch Corporation

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July 6, 2011

Martin Costello, P.E.
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road, M.S. 5500
Tallahassee, Florida 32399-2400

Subject: Stanton Energy Center Temporary Hydrated Lime Injection Installation

Dear Mr. Costello,

As recently discussed, OUC intends to use Illinois basin Coal at the Stanton Energy Center Unit 2 for a short period to evaluate unit performance with this coal. Blends of 25%, 50% and 75% Illinois basin coal will be evaluated. During this period, OUC intends to use a temporary hydrated lime injection installation in order to minimize the possibility of a visible "blue plume" characteristic of acid mist emissions when higher sulfur content coals are burned. The Illinois basin coal's sulfur content is typically higher than the Central Appalachian coal that the unit normally burns.

During this evaluation period, OUC plans to perform air emissions tests to both evaluate EGU MACT compliance potential and to verify compliance with the H₂SO₄ limit of 0.033 lb/million Btu heat input, per operating permit 0950137-031-AV. The tests will be completed at each of the different Illinois basin coal blends and the data will be available at the Department's request for review. Additionally, OUC will give a 7 day advance notice to the Department when the emission tests will be performed.

Emissions tests will be performed using the following methods; EPA 202 for total PM, EPA 5B for filterable PM, EPA 30B for Hg, EPA 26A for HCl and EPA CTM 13A or Controlled Condensate Method, NCASI 8A for H₂SO₄/SO₃. If you have any questions or need additional information please do not hesitate to contact me.

Regards,

David R. Báez
Project Engineer
Environmental Affairs
Orlando utilities Commission

cc: Garfield Blair

ORLANDO UTILITIES COMMISSION